Society of Practising Veterinary Surgeons Response to DEFRA- Reform of the Veterinary Surgeons Act 1966

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SPVS Response to DEFRA – Reform of the Veterinary Surgeons Act 1966

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Executive Summary

SPVS supports reform of the Veterinary Surgeons Act. Modernisation is both necessary and overdue. The current legislative framework no longer reflects contemporary veterinary practice, including team-based delivery, evolving ownership models, expanded roles of veterinary nurses and allied professionals, and increasing public expectations.

We support the overall direction of travel set out in this consultation. However, the proposals represent a significant structural shift. The introduction of statutory regulation of veterinary businesses, expansion to additional professional groups, new consumer and competition duties, and a broader regulatory remit will materially increase complexity, cost and expectation.

Reform must therefore be designed to deliver **maximum public assurance and transparency at the lowest sustainable cost**, without destabilising veterinary service provision.

The success of a modernised regulatory system will depend on two critical factors:

- **Clarity of governance and remit**, including strong, competency-based Board oversight
- **Evidence-led assessment of outcomes**, particularly in relation to consumer confidence and regulatory performance

The Structure or Governance models alone will not determine success — **efficiency, effectiveness and measurable outcomes are equally important**.

SPVS approaches this consultation from a veterinary business perspective. Our members provide front-line veterinary services, and the impact of reform on practice sustainability, investment capacity and service delivery is therefore central to our response.

We support the detailed response submitted via the BVA working group and do not seek to duplicate that work. Instead, this submission provides additional insight into practical implementation, economic impact and system design, informed by member survey data (Appendix A-C).

Taken together, our evidence highlights several key themes:

- Core regulatory functions (registration, standards, education and fitness to practise) remain highly valued and must not be diluted
- Professional leadership ("upstream") functions are valued but require clearer prioritisation and cost discipline
- There is strong support for reform, but also concern regarding cost, duplication and unintended consequences
- Governance quality and outcome-based accountability will be critical to maintaining trust

This submission therefore focuses on how reform can be delivered in a way that is **proportionate, economically sustainable and operationally effective**, while strengthening public confidence and maintaining professional standards.

Introduction and methodology

SPVS is a membership organization, established for over 92 years. The mission of SPVS (Society of Practicing Veterinary Surgeons) is to be a supportive membership community offering representation and industry-leading guidance for leaders in veterinary practice. SPVS represents over 630 veterinary practices with over 1100 members.

SPVS conducted a short impact survey of its members to quantify their perceptions on key issues that appeared to be challenging to resolve. The survey was also distributed amongst the membership of the Federation of Independent Veterinary Practices and XLVets community. The survey is included in Appendix A, and key elements are extracted and included in the body text of the submission. We received 277 responses in total with 196 completed. The survey includes only completed replies. 85% of respondents were from independent practice and 54% were owners of Directors, Owners or Partners.

The focus therefore for our submission is from a veterinary business perspective. This submission is to be read alongside that final document and provides a practice-based business insight into the consultation.

We also appreciate that some of the details in this report relate to both primary and secondary legislation. However, the detail of future legislation does affect the structure within the primary legislation.

Purpose and Hierarchy of Objectives

SPVS agrees that the primary objectives of reform must be the protection of animal health and welfare and the protection of public health. These objectives are foundational to veterinary regulation and must remain paramount.

Regulator functions and objectives

The primary function of Legislative Reform is to ensure that effective regulatory functions are achieved across the wider professional landscape.

Survey feedback clearly shows the importance of the disciplinary process, maintaining the professional register, oversight of veterinary education, defining and developing professional standards, guidance and training to achieve the standards. Logging of CPD requirements was still a valuable component but less widely supported. The quality and efficiency of delivery of these regulatory functions is paramount and must not be diluted during the Legislative Reform process. Most of the core regulator functions are retrospective or “downstream” functions.

In your opinion how valuable do you believe the following REGULATORY functions are to the veterinary profession?

Answer Choices	Not Valuable	Slightly Valuable	Moderately Valuable	Valuable	Very Valuable	Response Total
Disciplinary process (Fitness to practise)	2.04% 4	5.10% 10	8.67% 17	35.20% 69	48.98% 96	196
Logging CPD requirements	4.08% 8	6.12% 12	23.98% 47	40.31% 79	25.51% 50	196
Maintaining the professional register	1.02% 2	1.53% 3	5.10% 10	33.67% 66	58.67% 115	196
Oversight of veterinary education	3.57% 7	5.10% 10	9.69% 19	39.29% 77	42.35% 83	196
Defining and developing Professional standards	2.04% 4	4.59% 9	14.29% 28	37.76% 74	41.33% 81	196
Guidance, training, help to achieve standards	6.70% 13	7.22% 14	18.56% 36	42.27% 82	25.26% 49	194
Answered: 196 Skipped: 0						

Fig 1. How valuable are the key REGULATORY functions to the veterinary profession

The inclusion of consumer and competition duties reflects the changing environment in which veterinary services operate. However, these duties must be clearly subordinate to welfare and public health. Veterinary professional services are clinical services delivered under conditions of uncertainty, emotional pressure, and time sensitivity. Clinical judgement must not be compromised by price-led considerations. Contextualised care, transparency, and choice will largely manage these client concerns.

A clear legislative hierarchy of objectives provides stability, protects professional judgement and prevents regulatory drift toward purely commercial metrics. The new regulatory body requires agility, flexibility, but also clear guidelines that define how it approaches the regulatory process.

More detailed analysis of the SPVS survey clearly illustrates the importance of providing a system that increases trust in the functionality of the Regulator (for the professions and consumer), whilst delivering a disciplinary process which is efficient and well managed. Governance, accountability and loss of trust were highlighted in over 35% of the responses as a risk factor for legislative reform (Appendix B)

Third party auditing of the regulator was broadly supported and the importance of providing guidance to ensure that everyone understands how to achieve the standards. A compassionate, caring regulator is also supported as a key objective but is less important than delivering trust with the consumer/professions and an efficient, well managed disciplinary process.

There is clearly concern within the comments that the move to lay parity may undermine the confidence the profession has in the Regulatory process. This is an important perception that must be carefully managed within the reform process.

How important are the following areas for a REGULATOR ...

Answer Choices	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Response Total
delivers trust and confidence with the consumer	60.71% 119	33.16% 65	3.57% 7	1.53% 3	1.02% 2	196
delivers a disciplinary process which is efficient and well managed	62.24% 122	34.69% 68	1.53% 3	0.51% 1	1.02% 2	196
generates trust with the professions through transparent, clear communications	72.45% 142	23.47% 46	3.06% 6	0.00% 0	1.02% 2	196
Is a compassionate and caring	50.00% 98	32.14% 63	16.33% 32	1.02% 2	0.51% 1	196
Contextualised guidance is provided to ensure everyone understands how to achieve the standards	47.96% 94	42.35% 83	8.67% 17	1.02% 2	0.00% 0	196
Alleged professional misconduct is fully investigated and managed	55.10% 108	39.29% 77	5.10% 10	0.51% 1	0.00% 0	196
third party auditing (Professional Standards Authority) to build confidence and trust in processes	36.73% 72	37.76% 74	20.41% 40	4.08% 8	1.02% 2	196
Answered: 196 Skipped: 0						

Fig 2. The importance of key areas for effective Regulation

Professional Leadership functions

The Royal College provides the “upstream” supportive or preventative functions. The aim of these is to deliver resources to the profession to lessen the risk of disciplinary processes being required.

In your opinion how valuable do you believe the following PROFESSIONAL LEADERSHIP functions are to the veterinary profession?

Answer Choices	Not valuable	Slightly valuable	Moderately valuable	Valuable	Very valuable	Response Total
Practice Standards Scheme	9.18% 18	11.73% 23	21.43% 42	37.24% 73	20.41% 40	196
Postgraduate qualifications	3.06% 6	7.14% 14	25.51% 50	43.37% 85	20.92% 41	196
Advanced practitioner status	5.10% 10	12.24% 24	34.18% 67	32.65% 64	15.82% 31	196
Fellowship	14.29% 28	23.47% 46	32.14% 63	20.92% 41	9.18% 18	196
Mental health initiatives (Mind Matters)	14.29% 28	16.33% 32	24.49% 48	29.59% 58	15.31% 30	196
Evidence-based veterinary knowledge resources (QI etc)	6.63% 13	12.24% 24	23.98% 47	39.80% 78	17.35% 34	196
RCVS academy resources	11.73% 23	22.96% 45	31.12% 61	24.49% 48	9.69% 19	196
RCVS Knowledge	8.67% 17	21.43% 42	30.61% 60	26.53% 52	12.76% 25	196

Answered: 196 Skipped: 0

Fig 3. How valuable are the key PROFESSIONAL LEADERSHIP Functions

The value of the Professional Leadership functions is generally lower scoring than those within the regulatory area. Not all of these functions will be relevant to every professional group. The Professional Leadership functions are seen as less valuable, and perhaps this should provide a steer as to the level of funding allocated to Professional Leadership vs Regulator functions.

If the Professional Services elements were funded separately by subscription. What amount per year would you willing to pay per to support these elements?

Answer Choices	Responses		
Unwilling to support		12.76%	25
Less than £50		17.86%	35
£50-£99		26.53%	52
£100-£149		20.41%	40
£150-£199		12.24%	24
£200-£250		8.16%	16
More than £250		2.04%	4
Answered: 196 Skipped: 0		Response Total:	196

Fig. 4 What amount respondents would be willing to pay for professional leadership elements

There is clearly a diversity of opinion as to what level of financial support that would be acceptable to support centralised professional leadership, with the majority willing to contribute less than £100 per year on these activities (25% of the typical veterinary registration fee).

If RCVS resources were limited, which Professional Services should be prioritised as core priorities to focus on. Please consider work that other organisations are already providing. Please select up to a maximum of 5.

Answer Choices	Responses		
Mental health and wellbeing support		30.61%	60
Diversity, inclusion and widening access		21.43%	42
Profession -shaping strategy- VN Futures, horizon scanning		59.18%	116
RCVS Fellowship and learned- society functions, expert panels		27.55%	54
Leadership and management development		35.20%	69
Honours, awards and recognition		33.67%	66
Evidenced Based Medicine, QI, Contextualised care & knowledge		61.73%	121
RCVS Academy- Learning, development and career support		43.37%	85
Learning and Development- Certificates, Diplomas, Advanced practitioner		70.92%	139
Answered: 196 Skipped: 0		Response Total:	196

Fig 5. Respondents' views on the top priorities for Professional Leadership services

Learning and Development, evidenced based medicine, QI, contextualised care and forward-looking profession shaping strategies are considered top priorities. Other areas are provided through multiple sources elsewhere and perhaps explain the lower priority

allocated to these areas. The key priorities for the “upstream” work may need to be more clearly defined if resources are constrained.

How often have you personally used or referred to the following RCVS services in the past 12 months?

Answer Choices	Never	Once	2-3 times	More than 3 times	Not applicable	Response Total
RCVS Professional Code / guidance	25.51% 50	28.57% 56	28.57% 56	15.31% 30	2.04% 4	196
VetGDP scheme	50.00% 98	11.22% 22	7.14% 14	22.45% 44	9.18% 18	196
Practice Standards Scheme	33.16% 65	20.92% 41	15.31% 30	29.59% 58	1.02% 2	196
RCVS Academy learning resources	61.22% 120	16.84% 33	15.31% 30	3.57% 7	3.06% 6	196
RCVS Knowledge (eg QI, EBVM, Contextualised care etc)	52.04% 102	17.35% 34	16.33% 32	11.22% 22	3.06% 6	196
Mind Matters Initiative	73.98% 145	15.31% 30	5.61% 11	3.06% 6	2.04% 4	196

Answered: 196 Skipped: 0

Fig 6. How often have the RCVS services been utilised within the last 12 months

Most of the RCVS services have not been personally or referred to in the past 12 months by the respondents except for Practice standards. The professional code and guidance are commonly referred to (more than 1- 2 times per year) and only a minority (26%) have not referred to the guide in the last 12 months. The reason for the low uptake of RCVS Professional Leadership requires more detailed analysis.

RECOMMENDATIONS:

- **Animal health and welfare and public health must be explicitly defined in legislation as the primary objectives, with consumer and competition duties clearly subordinate. These will be tackled largely by the CMA Remedies in any event.**
- **Cost control may become more relevant with the expansion of the regulatory work. This may require closer consideration of what work is done and by who and how existing work can be more clearly communicated to the profession.**
- **A wide range of responsibilities and objectives lie within the Regulatory framework and prioritizing the activities within “upstream” and “downstream” regulatory areas is an important consideration**
- **Commercial impacts of delivery of any legislative reform within the diversity of practice types must be considered as part of the process. During our work with**

the CMA review we identified that impacts could differ significantly between small independent vs large group practices.

- **Impact assessments are crucial to help understand the reality of any proposed legislative change. As part of your work, we would urge you to consult further for any assistance in this area as we may be able to provide some insights and methodologies to ensure the changes are a successful with minimal unintended consequences**
- **There is logic in further assessment of the value proposition of Professional Leadership elements to identify the reasons behind relatively low uptake/ impact.**

Regulatory Independence vs strategic steer from government

Regulatory independence is fundamental to public confidence and sector stability.

We have concerns about the business impact of legally binding strategic steer powers introducing a risk of politicisation and short-term regulatory intervention. In a relatively small, labour-intensive sector with constrained margins, sudden shifts in regulatory direction could have a disproportionate economic impact. We are particularly nervous about this requirement as this introduces an external and avoidable risk to legislative reform.

Veterinary practices operate long-term business models within multi-year investment cycles, including premises development, succession planning, and clinical service expansion.

Accountability is essential. However, accountability must be clearly defined, structured and evidence based.

We are concerned that the profession could become subject to a steer which is not evidenced based or clearly thought through.

RECOMMENDATIONS:

- **Any Secretary of State strategic steer power must be evidence-triggered, subject to impact assessment, consultation and parliamentary scrutiny, and must explicitly preserve the primacy of animal welfare.**
- **Evidence gathered from consumer surveys, in house complaints, Vetlife, Mind Matters, professional surveys should underpin decisions, priorities and quantify progress. These should form the basis for evidenced based decisions.**

Statutory Regulation of Veterinary Businesses

The RCVS practice standards scheme is the closest model we have that regulates veterinary businesses. Survey data shows it is clearly supported.

Have you ever used or do you currently hold or take part in..

Answer Choices	Responses		
VetGDP		44.39%	87
Practice Standards Scheme		65.82%	129
Advanced practitioner status		17.35%	34
RCVS Fellowship		3.06%	6
Post Graduate Certficates/ Diplomas		22.96%	45
RCVS Specialist		3.06%	6
Not used or don't take part		16.33%	32
Answered: 196 Skipped: 0		Response Total:	196

Fig 7. How respondents use or hold/ take part in key Professional Leadership elements

SPVS supports statutory regulation of veterinary businesses.

The voluntary Practice Standards Scheme has delivered improvements but lacks universal reach and enforcement powers. We understand entirely the logic and need for regulation of veterinary businesses.

However, veterinary practices are already subject to multiple regulatory regimes, including medicines inspections, health and safety enforcement, employment law compliance and environmental oversight. Duplication of inputs would increase cost without improving outcomes. Devising a regulatory inspection system that minimises duplication is essential.

Inspection frequency and intensity should reflect risk profile, scale, compliance history and clinical scope. A one-size-fits-all model would be disproportionate. If well designed this would substantively reduce the cost of practice regulation. The use of self-assessment by the delegated professional responsible for the site must not be underestimated as a method.

Smaller practices operate with tighter margins and fewer administrative resources. If regulatory expansion disproportionately burdens smaller providers, consolidation will accelerate and rural access may decline.

RECOMMENDATION: Practice regulation must be risk-based, digitally enabled, integrated with existing inspections and proportionate to practice scale and risk.

Economic Sustainability and Cost Transparency

Regulatory expansion increases fixed costs for businesses. Veterinary practices ultimately fund regulation through fees which the client must pay. Excessive fixed cost risks reducing investment capacity, constraining workforce growth and increasing consolidation pressure. This is particularly relevant for the smaller businesses that the regulation is seeking to support (allied professionals, veterinary start-ups etc.) Given that the CMA remedies have already increased the costs of service provision and reporting we need to be mindful of the intensity and level of regulation required.

Transparent cost modelling allows practices and policymakers to understand the economic impact of reform. Phased implementation enables adaptation and reduces shock to the system and may be usefully deployed in the roll out of the reforms. With certain elements of regulatory change, the larger groups could go first, and the smaller practices then learn and are better supported and go last.

Many respondents highlighted the risk of increased bureaucracy and the impact this could have on time spent with patients.

> *"Too much enforced regulation and red tape."*
> *"Avoid unnecessary administrative requirements that do not directly improve outcomes."*

There is broad support for regulation that focuses on outcomes rather than process, and which supports good clinical work rather than adding friction.

Cost is a consistent concern, both in terms of practice sustainability and the knock-on effect for clients.

> *"Very expensive for what RCVS does for us."*
> *"Clear understanding of funding and where subscription fees go."*

There is a clear expectation that any new system should be transparent in how it is funded and mindful of the pressures already facing practices.

Economic sustainability is not an argument against reform. It is a requirement for reform to succeed with minimal harms. If we get the balance right, then this is win: win

for those being regulated and the clients they support. We must seek to keep costs under control.

RECOMMENDATIONS:

- **DEFRA should require transparent cost modelling, phased implementation and annual public reporting of regulatory expenditure categories.**
- **The efficiency of delivery of regulation must be optimised and made as "smart" as possible to minimise direct and opportunity costs for the practices.**
- **Technology will provide answers, but time is often required for this to develop. The utilisation of AI will clearly assist in the collation of data and assessment of risks within the profession and consumers.**
- **Consideration should be given to phased roll out of the business regulatory reform to allow for technological solutions to develop to reduce implementation costs.**

Consumer Confidence and Competition Duty

SPVS recognises that public confidence and trust must be strengthened.

However, veterinary services are not simple retail transactions. The professional has an almost impossible task of balancing client demands, expectations, costs and practicalities often in emotionally charged, urgent timeframes.

Price is only one component of value and there are some genuine concerns that this may become a primary focus of assessing consumer concerns.

Public confidence is essential. However, complaint volume alone does not provide sufficient evidence of systemic harm. Not all complaints are confirmed. Not all complaints are significant. Figures cited during the CMA review have not been fully contextualised against consultation volumes or categorised by theme. We are not fully clear as to the quantum of the consumer concerns within the CMA data.

The CMA cited approximately 55,000 complaints. However, the breakdown of reasons for complaint has not been fully published, nor contextualised against consultation volumes.

At the same time, many practices report high levels of client satisfaction and repeat engagement. There is clearly a disconnect and there is feedback from our members that suggest many complaints emanate from unrealistic expectations from the client. Indeed, this was cited as the most prevalent concern in a recent RCVS Surveys of the Profession (2024)

Veterinary practices deliver complex clinical services. The value proposition that the client feels encompasses the quality of communication, explanation, outcome satisfaction, accessibility and trust — not price alone.

If consumer and competition duties are embedded in legislation, they must be informed by structured, representative and transparent measurement which aims to capture value not just price. There are genuine concerns that the price of veterinary services could become a repetitive theme in the future and there must be a method to manage this narrative.

SPVS proposes development of a national consumer confidence and value framework including representative surveys, categorised complaints, activity-adjusted reporting and annual publication of sector indicators. Consumer surveys have been highlighted within the Provisional CMA remedies. Developing a standardised, well-designed survey which is randomly distributed within a representative number of animal owners (farm, equine, small animal) would provide an evidence base from which the Board of the Regulator could prioritise their activities.

The benefit of this approach is that there would be a quantifiable basis to any decisions undertaken.

The consumer and competition duty should operate primarily through enforceable transparency and fair dealing standards at practice level, supported by structured monitoring and evidence-based reporting. In our opinion should not extend to price control or market intervention beyond the regulator's core public protection role.

RECOMMENDATIONS:

- **DEFRA should establish a structured, evidence-based national consumer confidence and value framework including representative surveys, categorised complaint reporting and annual sector confidence indicators.**
- **The benefit of this approach is three-fold. Demonstrating progress, affording protection to non-evidenced based steers from government and assessment of key deliverables by the Regulator**

Governance, Board Selection and Remit

Governance Models

Survey responses showed a relatively even spread across the proposed governance models. However, 43% of respondents supported a model that separates regulatory and professional leadership functions. Around a quarter of respondents were unsure which model would be most appropriate, and this level of uncertainty remained even among those with a good understanding of the current system.

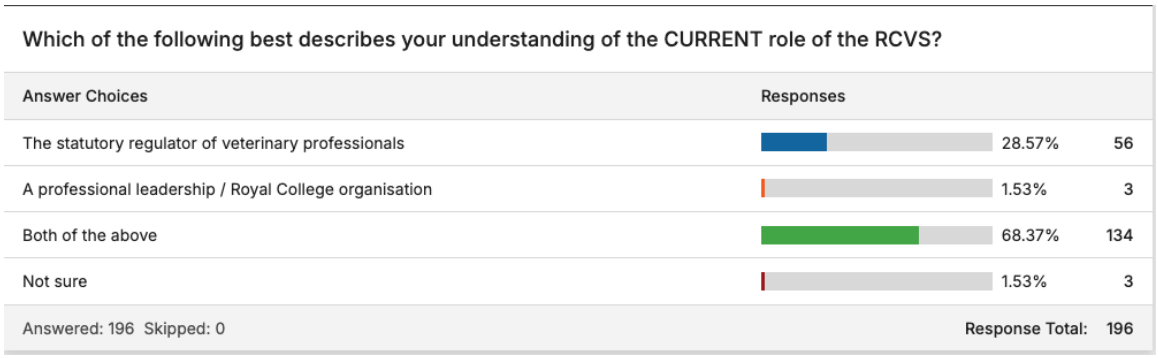
What model do you believe would be the best model to deliver effective veterinary regulation and ensure public trust?

Answer Choices	Responses		
Royal College that Regulates model (status quo)		28.06%	55
RCVS is the veterinary regulator but professional leadership functions are delegated to others (whole or part)		22.45%	44
General Veterinary Council is the veterinary regulator (mandatory fee), RCVS becomes a pure Royal College delivering professional leadership (voluntary fee)		21.43%	42
Unsure		24.49%	48
Other: please specify Show		3.57%	7
Answered: 196 Skipped: 0		Response Total:	196

Fig 8. The best model to deliver effective veterinary regulation and ensure public trust

This uncertainty is important. It reflects a lack of clarity around key aspects of the proposed models, particularly in relation to cost, complexity and how each option would operate in practice. In this context, it would be difficult to base a final decision solely on survey preference.

The current “Royal College that Regulates” model is relatively unusual internationally. While it may offer efficiencies through a combined structure, survey feedback (Fig 8) suggests more limited support for this approach compared to models that separate regulatory and professional leadership functions.



Which of the following best describes your understanding of the CURRENT role of the RCVS?

Answer Choices	Responses		
The statutory regulator of veterinary professionals		28.57%	56
A professional leadership / Royal College organisation		1.53%	3
Both of the above		68.37%	134
Not sure		1.53%	3
Answered: 196 Skipped: 0		Response Total:	196

Fig 9. Current understanding of the role of the RCVS

A consistent theme from both survey data and qualitative responses is the need for greater clarity and simplicity. A notable proportion of respondents were not aware of the full range of functions currently delivered by the RCVS, particularly in relation to professional leadership (Fig 9). This suggests that the current model may lack transparency, both within the profession and for consumers.

> *"Confusion within the profession of where current members answer to."*
> *"Crystal clear separation of regulatory vs professional leadership roles."*

Looking ahead, the proposed regulatory environment is significantly broader. It is expected to include practice regulation, consumer and competition responsibilities, and the incorporation of allied professions. This expansion increases the complexity of the system and raises questions as to whether the current model remains the most appropriate or cost-effective.

At this stage, there are credible arguments for both a joint model and a split model:

- A joint model may offer coordination across functions but carries a risk of complexity, lack of clarity and pressure on governance structures
- A split model is likely to provide greater clarity, simplicity and transparency, and is more consistent with international approaches

SPVS considers that either model could be workable. However, the survey evidence clearly points to a desire for simplicity, transparency and accountability, whichever structure is adopted.

Given the current lack of detail on cost, funding flows and operational delivery, further work is required before a definitive position can be taken.

Board Structure and Remit

The effectiveness of the Board will be central to the success of any governance model.

A strong and consistent theme from respondents is the importance of maintaining veterinary expertise within decision-making:

> *"Regulated by persons with too little knowledge of the coalface."*
> *"There must be vets in charge of the process."*

At the same time, there is recognition that regulatory governance must also support independence and public confidence. This creates a need for a balanced Board with both professional and lay expertise.

The proposed model of a single Board overseeing both regulatory and professional leadership functions raises practical questions. These functions have different objectives and require different skill sets:

- Regulatory oversight focuses on independence, risk and public protection
- Professional leadership focuses on development, guidance and support for the profession

Combining these within a single Board risks creating complexity, competing priorities and lack of clarity in remit.

An alternative approach would be to:

- establish a clearly defined regulatory Board, focused on statutory functions and public protection
- support professional leadership through a separate structure or delegated arrangements, potentially working with existing professional bodies

This approach may offer greater clarity and allow each function to operate with the appropriate focus and expertise.

SPVS considers that future reform should not only separate functions on paper, but also separate governance and executive management clearly in practice. In particular, the appointed Board should set strategy, approve budgets, scrutinise performance and hold

the executive to account, while the Chief Executive and executive team should be responsible for delivery and implementation only. If the future model retains a "Royal College that regulates" structure, the internal architecture must nevertheless provide a clear separation between the regulatory arm and the professional leadership arm, with unambiguous reporting lines and decision-making accountability. Without this, there is a risk that executive influence over priorities and resourcing could undermine confidence in the independence and effectiveness of the regulatory function.

Regardless of the model chosen, several principles appear important:

- Board appointments should be competency-based and transparent
- The Board should operate at a strategic level, focusing on outcomes rather than operational detail
- Roles and responsibilities between the Board, executive and any sub-committees should be clearly defined
- Structures should support accountability and confidence, both within the profession and for the public.

Financial Transparency and Accountability

A consistent limitation in assessing the proposed models is the absence of clear information on cost and funding.

There is currently limited visibility on:

- how resources are allocated between regulatory and professional leadership functions
- how costs would differ between governance models
- how future regulatory expansion would be funded

This lack of transparency makes it difficult to assess value for money or to compare options effectively. It also likely contributes to the level of uncertainty seen in survey responses.

This concern is also reflected in the CMA's final report, which emphasised that regulatory and professional leadership functions require separate consideration in relation to the source and use of funds, and that where both sit within one organisation there should be ringfenced funding and clear separation of governance.

Improved transparency around expenditures, costs and outcomes would support better decision-making and strengthen confidence in the system.

Strategic Role of the Board

As the regulatory remit expands, the Board's role should remain clearly strategic and accountable.

Its primary focus should be on ensuring that the system delivers:

- effective public protection
- proportionate regulation
- efficient use of resources
- sustained consumer and professional confidence

To support this, the Board would benefit from clear, outcome-based reporting, including:

- performance against regulatory standards
- timeliness and effectiveness of fitness to practise processes
- impact of practice regulation
- trends in consumer confidence
- financial allocation linked to outcomes

This approach would improve transparency and allow both the Board and stakeholders to understand how resources are being used and what outcomes are being achieved.

Summary

There is no single model that clearly emerges as the preferred option based on current evidence.

However, several consistent themes are evident:

- the need for clarity and simplicity in structure
- the importance of strong and competent governance
- a requirement for greater financial transparency
- and the need to maintain confidence across both the profession and the public

Further detail on costs, delivery and accountability will be essential to support an informed decision on the most appropriate governance model.

SPVS would welcome further detail from Defra to support a more informed assessment of these options.

Oversight and Prevention of Mission Drift

With expanded remit and multiple professions under one roof, complexity increases. Without structured oversight, mission drift and performance variability may occur.

76% of respondents strongly agreed/ agreed that third party audit would build trust and confidence in processes.

Full PSA-style oversight may provide assurance but could introduce significant additional cost for a relatively small regulator. We have no clear understanding what this cost may be so are not able to clearly weigh up the pros and cons of this arrangement. A PSA oversight would provide a level of assurance of operation that may provide much needed assurance. However, at what cost?

Enhanced transparency, measurable performance reporting, independent audit and structured parliamentary scrutiny may provide and alternative proportionate assurance.

SPVS recognises that full PSA-style oversight may be viewed as disproportionate for a regulator of this size. However, if external oversight is not adopted, the legislation must require an equivalent level of structured accountability.

Transparency alone is not sufficient. Published annual reports without clear, measurable performance standards do not provide assurance that reform is delivering improvement.

Robust systems of Performance management

If any model is to command long-term confidence — from the public, professionals and Parliament — it should include a small number of clearly defined, auditable performance areas.

These should cover the following core domains.

Fitness to Practise and Complaints Handling

The public protection function must be timely, consistent and proportionate.

Performance reporting should include:

- Median time from complaint receipt to triage decision,
- Median time from complaint receipt to final outcome,
- Number of cases older than defined thresholds (e.g. 6 and 12 months),
- Proportion of cases resolved at early stage,
- Cost per case by route,
- Repeat concern rates.

Regular publication of these figures would drive improvement and build confidence that cases are handled efficiently and fairly.

Practice Regulation and Inspection

If statutory practice regulation is introduced, it must be demonstrably risk-based and proportionate.

Reporting should include:

- Proportion of practices assessed annually (by risk tier),
- Median time from inspection to outcome,
- Distribution of inspection findings (compliant / minor action / significant action),
- Reinspection rates and recurrence of significant non-compliance.

This ensures that regulatory effort is focused where risk is highest and that compliance burden remains proportionate.

Consumer Confidence and Value Monitoring

Consumer and competition duties must be informed by evidence rather than isolated complaint data.

A structured national framework should track:

- An annual consumer confidence index (trust, communication, explanation, perceived fairness),
- Complaint rates adjusted for activity levels,
- Categorisation of complaints (price level, price transparency, communication, clinical outcome, access),
- Proportion resolved at practice level.

This would allow DEFRA and Parliament to assess trends objectively and intervene proportionately if needed.

Governance and Financial Transparency

Strong governance requires visible accountability.

Reporting should include:

- Allocation of expenditure by regulatory function
- Unit costs (e.g. cost per fitness to practise case, cost per inspection)
- Administrative overhead as a proportion of total spend
- Progress against published annual objectives

This strengthens trust in the funding model under Option 1, even if formal ringfencing is not adopted.

Taken together, these measures would provide a practical, proportionate assurance framework. They would replicate the core strengths of PSA-style oversight — measurable standards, transparency and escalation capability — without necessarily imposing a second statutory body.

The aim should not be to increase regulatory weight, but to increase regulatory clarity and performance without additional costs for our members.

RECOMMENDATIONS:

- **DEFRA should embed measurable performance reporting and improved transparency within Option 1 together with carefully weighing cost-benefit considerations before imposing full PSA-style oversight.**
- **Legislation should mandate a clear performance framework including measurable timeliness standards, inspection reporting, consumer confidence metrics, financial transparency and independent audit, with results published regularly to Parliament and stakeholders.**
- **Whichever route is deployed there needs to be consumer feedback on the proposal to ensure that the primary objective of consumer assurance is achieved.**

Incorporation of Allied Professions

SPVS considers it essential that the incorporation of allied professions is designed in a way that is economically viable at small scale.

Very small registrant groups face a simple arithmetic constraint. Even with annual fees in the region of several hundred pounds per registrant, total income for groups numbering only a few hundred will be limited. The fixed costs associated with statutory regulation — governance time, standards maintenance, registration systems, legal support and fitness to practise processes — are largely independent of registrant numbers. If each profession were required to replicate a full regulatory structure within the statutory framework, per-capita costs would become disproportionate.

A rigid interpretation of “no cross-funding” risks making participation financially unviable for micro-professions. This could reduce workforce supply, undermine confidence in the reformed framework, and create avoidable implementation friction.

SPVS believes a more practical and proportionate model is available.

Allied professions should be able to:

- Access a shared statutory regulatory infrastructure (registration, fitness to practise, governance, oversight and common systems);
- Retain responsibility through their professional organisations for upstream professional leadership, continuing professional development and member support. This allows the costs of the centralised professional leadership area to be controlled rather than expanded.
- Operate within clearly defined scopes of practice and core conduct standards approved by the regulator.
- Be subject to proportionate regulatory requirements aligned to their scale and risk profile.

Under this model, allied professions “sign into” a common regulatory backbone rather than replicating full regulatory functions independently. Shared infrastructure reduces duplication and allows micro-professions to participate without unsustainable fee levels.

Transparency of cost allocation remains important. Even within a shared model, reporting by regulatory activity and cost-to-serve will be essential to maintain confidence across all registrant groups.

The objective should not be to dilute assurance, but to design a structure that is proportionate, financially sustainable and capable of long-term stability.

Recommendation

DEFRA should ensure that allied professions incorporated under the reformed Act are able to access shared regulatory infrastructure while retaining responsibility for their own professional leadership functions, with regulatory requirements proportionate to scale and risk and transparent cost allocation to ensure economic viability.

It will be important to address this issue at the design stage rather than during implementation. If the regulatory model proves economically unworkable for smaller allied professions, there is a risk of delayed uptake, resistance from affected groups, or unintended workforce impacts. This would not reflect a failure of reform in principle, but rather a structural design issue that could undermine confidence in the new framework. Ensuring economic viability and proportionality from the outset will support smoother implementation and long-term stability of the reformed Act.

Member Voice Summary: Risks and Solutions from Veterinary Professionals

SPVS analysed qualitative responses from veterinary professionals to understand both the perceived risks and potential solutions associated with reform of the Veterinary Surgeons Act.

Overall, the findings indicate that the profession is not resistant to reform itself. Rather, there is a consistent and constructive message: reform must be proportionate, clinically informed, economically sustainable and practically deliverable.

1. Maintaining veterinary-led regulation is essential

“Regulated by persons with too little knowledge of the coalface.”
“There must be vets in charge of the process.”

2. Regulation must be proportionate and focused on outcomes

“Too much enforced regulation and red tape.”
“Avoid unnecessary administrative requirements that do not directly improve outcomes.”

3. Cost and economic impact must be carefully managed

“Very expensive for what RCVS does for us.”
“Clear understanding of funding and where subscription fees go.”

4. Governance and accountability are critical to trust

“Loss of elected officers would mean loss of accountability and trust.”
“Stringent board selection… consulting with those on the ground.”

5. Clear structure and roles are essential

“Confusion within the profession of where current members answer to.”
“Crystal clear separation of regulatory vs professional leadership roles.”

6. Regulation must reflect the realities of practice

“Listening to clinical members of the profession.”
“Owners of veterinary businesses need to be accountable.”

7. Avoiding unintended consequences is a key concern

“Increased compliance costs may accelerate consolidation within the sector.”
“Additional bureaucracy could reduce time available for patient care.”

8. Simplicity, communication and engagement will determine success

“Creation of a straightforward clear structure.”
“Communication, communication, communication.”

Overall, the profession supports reform that is veterinary-led, proportionate, economically sustainable, clearly structured and grounded in real-world practice.

Further categorisation of the replies has been undertaken in Appendix B and C. The full survey including all open-ended responses is in Appendix A.

Conclusion

SPVS supports reform of the Veterinary Surgeons Act and believes that modernisation is both necessary and achievable. The proposed changes offer a significant opportunity to strengthen public confidence, improve transparency and align regulation with the realities of modern veterinary practice.

However, reform must be delivered with careful attention to **cost, proportionality and practical implementation**. Veterinary services operate within a financially constrained, labour-intensive sector. Excessive regulatory burden risks unintended consequences, including increased client costs, reduced investment capacity and accelerated consolidation.

For reform to succeed, several core principles must be embedded from the outset:

- Animal health, welfare and public protection must remain paramount
- Regulatory independence must be preserved and protected from short-term influence
- Practice and allied profession regulation must be proportionate and economically viable
- Governance must be competency-based, strategic and clearly accountable
- Oversight must be transparent, measurable and focused on outcomes rather than process
- Consumer and competition duties must be informed by structured, representative evidence rather than anecdote
- Trust within all stakeholders must be assured through robust governance and transparency

A successful model will be one that **balances assurance with practicality** — strengthening trust and accountability while avoiding unnecessary regulatory weight or duplication. The use of technology phased implementation and risk-based approaches will be important in achieving this balance.

Ultimately, the objective should be to create a regulatory system that is:

- **Trusted by the public**
- **Respected by the profession**
- **Efficient in delivery**
- **Sustainable over the long term**

With strong governance, clear outcomes and proportionate design, the reformed Act can achieve these aims.

SPVS remains committed to constructive engagement to ensure that reform strengthens the veterinary sector and supports those delivering care on the ground.

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Appendix A. Survey responses from 196 veterinary professionals

2. Your details

1. What is your job title?				
Answer Choices			**Response Percent**	**Response Total**
1	Veterinary surgeon		63.27%	124
2	Director, Owner or Partner		54.59%	107
3	Practice Manager		7.14%	14
4	Nurse Manager		1.53%	3
5	RVN		4.59%	9
6	Clinical manager/ Director		1.53%	3
7	Reception/ Client Care Manager		2.04%	4
8	Locum		1.53%	3
9	Other (please specify):		3.57%	7
			answered	196
			skipped	0

2. Where do you currently work (mainly)?

	Answer Choices		Response Percent	Response Total
1	Independent Practice		85.20%	167
2	Independent Large Group Practice >10 practices		0.51%	1
3	Corporate owned Practice		5.61%	11
4	Joint Venture Clinical Practice		3.06%	6
5	University		0.51%	1
6	Retired from Clinical Practice		2.55%	5
7	Private Consultancy		1.02%	2
8	Wider Veterinary Industry		0.51%	1
9	Other (please specify):		1.02%	2
			answered	196
			skipped	0

3. How long as your business been trading?

	Answer Choices		Response Percent	Response Total
1	Not open yet		0.51%	1
2	0-2 years		5.61%	11

3. How long as your business been trading?				
3	3-5 years		8.16%	16
4	6-20 year		22.45%	44
5	Over 20 years		63.27%	124
			answered	196
			skipped	0

4. How many FTE vets are there in your practice?				
Answer Choices			**Response Percent**	**Response Total**
1	1		5.10%	10
2	2-3		18.88%	37
3	4-7		20.92%	41
4	8-12		14.29%	28
5	13-20		15.31%	30
6	20+		20.41%	40
7	Not applicable		5.10%	10
			answered	196

5. What best describes your practice?

	Answer Choices		Response Percent	Response Total
1	100% First Opinion Small Animal		58.67%	115
2	SA Referral Practice		4.59%	9
3	>80% Small animal		4.08%	8
4	Mixed practice		21.43%	42
5	Equine practice		1.02%	2
6	Farm Animal practice		4.59%	9
7	Other (please specify):		5.61%	11
			answered	196
			skipped	0

3. Awareness of RCVS functions

6. Which of the following best describes your understanding of the CURRENT role of the RCVS?				
Answer Choices			**Response Percent**	**Response Total**
1	The statutory regulator of veterinary professionals		28.57%	56
2	A professional leadership / Royal College organisation		1.53%	3
3	Both of the above		68.37%	134
4	Not sure		1.53%	3
			answered	196
			skipped	0

7. How well do you understand the current functions of the RCVS?				
Answer Choices			**Response Percent**	**Response Total**
1	Very limited understanding		3.57%	7
2	Limited understanding		19.90%	39
3	Moderate understanding		45.92%	90
4	Good understanding		23.98%	47
5	Very good understanding		6.63%	13
			answered	196
			skipped	0

4. Awareness and use of RCVS Activities

8. How often have you personally used or referred to the following RCVS services in the past 12 months?						
Answer Choices	**Never**	**Once**	**2-3 times**	**More than 3 times**	**Not applicable**	**Response Total**
RCVS Professional Code / guidance	25.51% 50	28.57% 56	28.57% 56	15.31% 30	2.04% 4	196
VetGDP scheme	50.00% 98	11.22% 22	7.14% 14	22.45% 44	9.18% 18	196
Practice Standards Scheme	33.16% 65	20.92% 41	15.31% 30	29.59% 58	1.02% 2	196
RCVS Academy learning resources	61.22% 120	16.84% 33	15.31% 30	3.57% 7	3.06% 6	196
RCVS Knowledge (eg QI, EBVM, Contextualised care etc)	52.04% 102	17.35% 34	16.33% 32	11.22% 22	3.06% 6	196
Mind Matters Initiative	73.98% 145	15.31% 30	5.61% 11	3.06% 6	2.04% 4	196
					answered	196
					skipped	0

9. Have you ever used or do you currently hold or take part in..				
Answer Choices			**Response Percent**	**Response Total**
1	VetGDP		44.39%	87
2	Practice Standards Scheme		65.82%	129
3	Advanced practitioner status		17.35%	34
4	RCVS Fellowship		3.06%	6
5	Post Graduate Certficates/ Diplomas		22.96%	45
6	RCVS Specialist		3.06%	6
7	Not used or don't take part		16.33%	32
			answered	196
			skipped	0

5. Value of the RCVS Functions

10. In your opinion how valuable do you believe the following REGULATORY functions are to the veterinary profession?

Answer Choices	Not Valuable	Slightly Valuable	Moderately Valuable	Valuable	Very Valuable	Response Total
Disciplinary process (Fitness to practise)	2.04% 4	5.10% 10	8.67% 17	35.20% 69	48.98% 96	196
Logging CPD requirements	4.08% 8	6.12% 12	23.98% 47	40.31% 79	25.51% 50	196
Maintaining the professional register	1.02% 2	1.53% 3	5.10% 10	33.67% 66	58.67% 115	196
Oversight of veterinary education	3.57% 7	5.10% 10	9.69% 19	39.29% 77	42.35% 83	196
Defining and developing Professional standards	2.04% 4	4.59% 9	14.29% 28	37.76% 74	41.33% 81	196
Guidance, training, help to achieve standards	6.70% 13	7.22% 14	18.56% 36	42.27% 82	25.26% 49	194
					answered	196
					skipped	0

11. In your opinion how valuable do you believe the following PROFESSIONAL LEADERSHIP functions are to the veterinary profession?

Answer Choices	Not valuable	Slightly valuable	Moderately valuable	Valuable	Very valuable	Response Total
Practice Standards Scheme	9.18% 18	11.73% 23	21.43% 42	37.24% 73	20.41% 40	196
Postgraduate qualifications	3.06% 6	7.14% 14	25.51% 50	43.37% 85	20.92% 41	196
Advanced practitioner status	5.10% 10	12.24% 24	34.18% 67	32.65% 64	15.82% 31	196
Fellowship	14.29% 28	23.47% 46	32.14% 63	20.92% 41	9.18% 18	196
Mental health initiatives (Mind Matters)	14.29% 28	16.33% 32	24.49% 48	29.59% 58	15.31% 30	196
Evidence-based veterinary knowledge resources (QI etc)	6.63% 13	12.24% 24	23.98% 47	39.80% 78	17.35% 34	196
RCVS academy resources	11.73% 23	22.96% 45	31.12% 61	24.49% 48	9.69% 19	196
RCVS Knowledge	8.67% 17	21.43% 42	30.61% 60	26.53% 52	12.76% 25	196
					answered	196
					skipped	0

6. Regulation and Professional Leadership. Who should deliver these functions?

12. What model do you believe would be the best model to deliver effective veterinary regulation and ensure public trust?

	Answer Choices		Response Percent	Response Total
1	Royal College that Regulates model (status quo)		28.06%	55
2	RCVS is the veterinary regulator but professional leadership functions are delegated to others (whole or part)		22.45%	44
3	General Veterinary Council is the veterinary regulator (mandatory fee), RCVS becomes a pure Royal College delivering professional leadership (voluntary fee)		21.43%	42
4	Unsure		24.49%	48
5	Other: please specify		3.57%	7
			answered	196
			skipped	0

Other: please specify (7)

1	10/03/2026 7:10 PM ID: 292492915	A GVC funded by a mandatory Royal College membership from each regulated profession. A set fee passing up from RC to GVC with the remainder used for the professional leadership role. Otherwise GVC + RC
2	11/03/2026 12:03 AM ID: 292510916	Royal college that regulates but not status quo

12. What model do you believe would be the best model to deliver effective veterinary regulation and ensure public trust?		
3	12/03/2026 6:30 AM ID: 292608091	Existing Act but used and enforced competently
4	12/03/2026 7:19 AM ID: 292609060	I think splitting could in long term could be worse, but think the model proposed in the consultation needs more work to ensure the different functions are well defined and understood
5	12/03/2026 11:55 AM ID: 292636520	Still unsure - will completely depend on the Governance of the Structure - it need not be a Status Quo with excellent governance and oversight
6	12/03/2026 2:15 PM ID: 292657510	RCVS seems to be failing on all fronts at the moment. Possibly regulatory function only and a body that understands what vets and the public want for leadership?
7	21/03/2026 7:19 AM ID: 293281030	I can see that the public will struggle to believe that the RCVS is an independent regulator. There probably is a perceived conflict of interest. But I would hope that is surmountable with sufficient regulator independence. As a vet I would NOT be confident about regulation of the profession becoming a government function

7. Funding priorities

13. If RCVS resources were limited, which Professional Services should be prioritised as core priorities to focus on. Please consider work that other organisations are already providing. Please select up to a maximum of 5.

Answer Choices			Response Percent	Response Total
1	Mental health and wellbeing support		30.61%	60
2	Diversity, inclusion and widening access		21.43%	42
3	Profession -shaping strategy- VN Futures, horizon scanning		59.18%	116
4	RCVS Fellowship and learned-society functions, expert panels		27.55%	54
5	Leadership and management development		35.20%	69
6	Honours, awards and recognition		33.67%	66
7	Evidenced Based Medicine, QI, Contextualised care & knowledge		61.73%	121
8	RCVS Academy- Learning, development and career support		43.37%	85
9	Learning and Development- Certificates, Diplomas, Advanced practitioner		70.92%	139
			answered	196
			skipped	0

14. If the Professional Services elements were funded separately by subscription. What amount per year would you willing to pay per to support these elements?

Answer Choices			Response Percent	Response Total
1	Unwilling to support		12.76%	25
2	Less than £50		17.86%	35
3	£50-£99		26.53%	52
4	£100-£149		20.41%	40
5	£150-£199		12.24%	24
6	£200-£250		8.16%	16
7	More than £250		2.04%	4
			answered	196
			skipped	0

8. Regulatory Confidence, Transparency and Choice

15. How important are the following areas for a REGULATOR ...						
Answer Choices	**Strongly agree**	**Agree**	**Neither agree nor disagree**	**Disagree**	**Strongly disagree**	**Response Total**
delivers trust and confidence with the consumer	60.71% 119	33.16% 65	3.57% 7	1.53% 3	1.02% 2	196
delivers a disciplinary process which is efficient and well managed	62.24% 122	34.69% 68	1.53% 3	0.51% 1	1.02% 2	196
generates trust with the professions through transparent, clear communications	72.45% 142	23.47% 46	3.06% 6	0.00% 0	1.02% 2	196
Is a compassionate and caring	50.00% 98	32.14% 63	16.33% 32	1.02% 2	0.51% 1	196
Contextualised guidance is provided to ensure everyone understands how to achieve the standards	47.96% 94	42.35% 83	8.67% 17	1.02% 2	0.00% 0	196
Alleged professional misconduct is fully investigated and managed	55.10% 108	39.29% 77	5.10% 10	0.51% 1	0.00% 0	196
third party auditing (Professional Standards Authority) to build confidence and trust in processes	36.73% 72	37.76% 74	20.41% 40	4.08% 8	1.02% 2	196
					answered	196
					skipped	0

9.Risks and concerns of legislative reform

16. What risks and concerns do you have regarding the future regulation of the professions?			
Answer Choices		**Response Percent**	**Response Total**
1	Open-Ended Question	100.00%	92

1	10/03/2026 7:10 PM ID: 292492915	The erosion of the role of veterinary surgeons. We currently have a defined scope of regulated activity, this is likely to be chipped away at with further AVPs being regulated. Without strong advocacy and strict stop points in the primary legislation to enforce consultation and engagement from the profession, this could leave vets with a very limited amount of protected activities going forward. This would be a poor outcome for the profession and leave national resilience and animal health and welfare leadership in a worse state. The potential loss of omnicompetance training leading to a pigeonholing effect and loss of agility, resilience and flexibility in the profession of the future.
2	10/03/2026 8:41 PM ID: 292500570	That with a college who regulates and regulates ither people the role of the vet will be diminished and less trust will reukt
3	11/03/2026 12:03 AM ID: 292510916	A dumbing down of what it means to be a 'veterinary professional'. This will all come out in the wash, but we might find that the woollen jumper called veterianry surgeon is somewhat shrunk.
4	11/03/2026 6:42 AM ID: 292517879	high salary demands when not capable (or not willing) to work to a level where generates turnover
5	11/03/2026 8:04 AM ID: 292520311	Dilution of professional involvement resulting in a regulator that doesn't really understand the many facets of the real-life profession.
6	11/03/2026 8:27 AM ID: 292520733	Mission creeping likely to result in trying to include all sorts of ancillary professionals who should have a separate governing body. The current RCVS shows poor communication and understanding of real life situations that we have to cope with. Expanding remit is not likely to improve this.
7	11/03/2026 9:05 AM ID: 292523372	Significantly increased costs if a new regulator were to be created rather than sticking with the 'Royal College that regulates' model

16. What risks and concerns do you have regarding the future regulation of the professions?		
8	11/03/2026 10:30 AM ID: 292528636	Businesses need regulation. Companies should be subject to fines proportional to national turnover where protocols or pressure placed on vets in position not to follow professional conduct.
9	11/03/2026 3:35 PM ID: 292567313	Unintended consequences of actions leading to a move away form the value of being a professional
10	11/03/2026 3:35 PM ID: 292567348	It becomes a tick box exercise that can be manipulated
11	11/03/2026 3:37 PM ID: 292567591	I don't think the general public hive any consideration to whether they trust the veterinary regulatory body, they are looking to trust their vet, and the RCVS should be configured to support it's members to deliver animal welfare.
12	11/03/2026 3:37 PM ID: 292567417	Bringing regulation of allied professionals under one umbrella will create confusion and be difficult to enforce. Weakening the reputation of vets. Creating confusion. Too many derogations to allied professionals. Abandoning the concept of the vet led team
13	11/03/2026 7:07 PM ID: 292588137	Lay people sitting in judgement of veterinary staff with no understanding of the difficulty of the job and often a vendetta
14	11/03/2026 7:20 PM ID: 292589299	Complexity of the process. Restoring trust with consumers. Rising costs of regulation and professional leadership. Making this work for allied professionals
15	11/03/2026 8:05 PM ID: 292591871	Need for collaboration with other professional bodies eg radiographers who work across human and veterinary care will not pay 2 professional fees. There should be NO exclusions for abattoirs/state veterinary services (section 3.3) on the basis that they are regulated by other means, unless the same exemption applies to businesses wholly owned by regulated professionals.
16	11/03/2026 8:34 PM ID: 292593775	I am not confident in the skill levels of the people who would be ‘in charge’. I have not experienced any interactions with the RCVS that have inspired my confidence in the people or the structure, spanning a career of several decades.These interactions include a couple of client complaints, attempting to utilise the VetGDP (even the enthusiastic new graduates don’t get the point of it), reading some of the stuff that gets sent and attending one or two events. I can’t see it suddenly getting better, just more expensive and onerous.
17	11/03/2026 8:42 PM ID: 292595527	I don’t think the government or RCVS actually have the best interests of vets at heart

16. What risks and concerns do you have regarding the future regulation of the professions?		
18	11/03/2026 8:47 PM ID: 292594284	That the RCVS will have carte blanche to restrict a vet's ability to perform their job. That there will be restrictions on what new graduates can do which aren't compatible with employing them in smaller practices. That there will be mandatory practice standards meaning more paperwork and more hoops to jump through which will be more difficult for the smaller independant practices to achieve
19	11/03/2026 9:09 PM ID: 292596808	That the standards of care will get diluted and not policed properly.
20	11/03/2026 9:20 PM ID: 292597157	The current situation is not working well I do not believe. Disciplinary processes are long winded and clunky. The public I don't believe trust the process. It's stressful for professionals going through it. My concerns are that changes ought to make both of these situations better (for public and for the professionals) but will it? Can we deliver a regulatory body and a professional body? This would be my preference but Can we deliver this with limited funds?
21	11/03/2026 11:26 PM ID: 292601836	Reach to where needed. Suppression of patient centred care by vested interests. Disillusionment and retention of profession. Proportion of time spent on administration over patient care. Consequential cost increases.
22	12/03/2026 6:29 AM ID: 292608121	Will be taken over by professionals external to the profession who have very little understanding of of how the profession works, the limitations and difficulties vets have to navigate and negotiate every day
23	12/03/2026 6:30 AM ID: 292608091	The profession is being usurped and turned into a QUANGO. DEFRA's veterinary service and the Vet Schools are removing themselves from effective professional oversight.
24	12/03/2026 6:35 AM ID: 292607779	1. Risk of over-regulation and administrative burden While modernising veterinary legislation is necessary, there is a risk that reforms could introduce excessive regulatory requirements that increase administrative workload for clinicians and practice owners. Many veterinary professionals are already under significant pressure, and additional bureaucracy could reduce time available for patient care and contribute to burnout within the profession. 2. Unintended consequences of business regulation The potential introduction of regulation of veterinary businesses, highlighted during the CMA investigation, may improve transparency and consumer confidence. However, if not carefully designed, it could disproportionately impact smaller independent practices that already operate with tight margins. Increased compliance costs may accelerate consolidation within the sector and reduce diversity of practice ownership. 3. Workforce pressures The veterinary profession is experiencing recruitment and retention challenges. If regulatory reform significantly increases compliance obligations, professional scrutiny or litigation risk, it could discourage people from entering or remaining in the profession. 4. Clarity around responsibility and delegation

16. What risks and concerns do you have regarding the future regulation of the professions?		
		Modern veterinary practice relies on a team-based approach involving veterinary surgeons, veterinary nurses and support staff. Expanding the role of veterinary nurses and allied professionals may improve efficiency and career development, but legislation must clearly define responsibility and accountability to avoid confusion around clinical decision-making and patient safety. 5. Public expectations and misunderstanding Increased focus on consumer protection may unintentionally create unrealistic expectations among pet owners regarding clinical outcomes or pricing. Veterinary medicine often involves complex decision-making, uncertainty and financial constraints that differ from human healthcare systems. 6. Risk of regulatory overlap If multiple bodies are responsible for oversight of professionals and veterinary businesses, there is a risk of duplicated regulation, conflicting requirements and confusion within the profession.
25	12/03/2026 7:19 AM ID: 292609060	I am concerned that there will need to be a massive uplift in size of the operation to cover all the current desired aims. If the royal college and regulator split I am concerned that these organisations will vitally be affected by indivudal ego and politics and not work together to the detriment of the profession. I do think the current function is very confusion and I worry that vets are disengaged and disillusioned with RCVS as its functions are not clearly understood so may push for more dramatic changes which long term willl be a negative
26	12/03/2026 8:33 AM ID: 292611891	The main problem is that vets are regulated but ultimately business owners, who may not be vets, are effectively not! Thus the vets potentially carry the can for problems which may not be of their making.
27	12/03/2026 9:23 AM ID: 292615132	Would not want to see: 1. Lay people with strong opinions by fundamental ignorance making decisions which shape the profession or veterinary careers 2. Financial leverage eg LVGs being used to steer rules in the favour of LVGs and away from independent practice. 3. Unawareness of unintended consequences of change
28	12/03/2026 11:19 AM ID: 292630495	Over-regulation where they start defining areas which should be down to individual practice discretion.
29	12/03/2026 11:55 AM ID: 292636520	The time it is going to take to implement a new VSA - we need it now The need to still have a vet-led group of professions - vets have to remain as the lead profession the status quo is not working - for it to work we need strong, clear, compassionate, effective and accountable governance There are clear concerns and nuances about what we call each other in the future We cannot be a Royal College of Veterinary Services just to keep RCVS - A College is "an organised group of professional people with particular aims, duties, and privileges" - not a College of activities. Suggest a Royal College of Veterinary Professionals

16. What risks and concerns do you have regarding the future regulation of the professions?		
30	12/03/2026 12:05 PM ID: 292638820	Too much emphasis on bureaucracy taking away autonomy of practices who are just trying to do good for animals and sustain a business
31	12/03/2026 12:10 PM ID: 292639254	I think the public have no idea of real costs of running a clinic and treating pets as they have been cushioned by the NHS. Corporate practices with low cost 'entry level' fees and huge mark ups on procedures etc have created a situation where the public feel they are being ripped off. Transparency is good regarding costings, but in some situations it is impossible to accurately forecast.
32	12/03/2026 12:41 PM ID: 292643103	The RCVS should also be there to support the profession in a professional context. It seems to be just focussed on regulation and discipline. It is far to concerned with areas that can be supported by other bodies such as Mental Health, Diversity, sustainability.
33	12/03/2026 12:42 PM ID: 292643946	The allied organisations such as farriers, hoof trimmers, equine dentists, physiotherapy and how they all would fit in.
34	12/03/2026 12:54 PM ID: 292646038	Loss of understanding of day to day of the profession.
35	12/03/2026 1:52 PM ID: 292654724	If controlled by a board there needs to be a clear, stringent selection process. Worries re cost impact on practices and ultimately fees for clients
36	12/03/2026 1:53 PM ID: 292654605	I am concerned that the ability of the regulator to manage allied professionals may be limited, resulting in vets who follow the code and allied professionals which do not engage/no enforcement if not engaging. I'm concerned that the regulator is poor at managing corporate environment vs individuals, and is behind the curve with start ups and digital environment.
37	12/03/2026 2:15 PM ID: 292657510	Need to maintain veterinary input. Need the profession to have say in who is in charge - elected not appointed croniesism - we don't want Peter Mandelson. Vets don't vote in elections as fed up with RCVS
38	12/03/2026 3:15 PM ID: 292666271	Lack of input into these changes by most vets and RVNs Conflation of process with CMA Unintended obfuscation and cost to practicing individuals Risks to animal welfare through perceived leniency of fitness to practice processes

16. What risks and concerns do you have regarding the future regulation of the professions?		
39	12/03/2026 3:38 PM ID: 292668821	Over regulation. The RCVS has allowed corporates to have a free for all on what they do and suck out huge profits.
40	12/03/2026 3:39 PM ID: 292669380	That we will forget the core principles of providing valued, sound, trustworthy veterinary care for the citizens of the UK.
41	12/03/2026 3:44 PM ID: 292670138	I think if a different governing body was responsible for regulatory concerns, they could provide a better service than the current, however, I do not believe yearly validation to be practical. Costs must be reasonable
42	12/03/2026 3:59 PM ID: 292670808	Instead of it all being under veterinary leadership sections will be allocated to non veterinary led sources who may not understand the complexities of the profession
43	12/03/2026 4:34 PM ID: 292676222	Concerns about appointed membership rather than voted
44	12/03/2026 4:40 PM ID: 292677100	I am concerned the current VSA cannot regulate business owners only MRCVS, I was the VN title to be protected
45	12/03/2026 5:33 PM ID: 292681769	Confusion within the profession of where current members answer to. Increased expense to members if not contained under single Royal college leadership
46	12/03/2026 6:13 PM ID: 292685198	Current RCVS model not fit for purpose and takes too long. Often lots of prolonged stress to professionals. The process needs to become more efficient and have clinicians involved that understand the nuances of allegations made
47	12/03/2026 6:37 PM ID: 292686865	iIf the RCVS takes over regulation of other groups such as animal physiotherapists or equine dental techs there is a danger that there will be reduced concentration on veterinary matters.
48	12/03/2026 6:59 PM ID: 292689089	Regulation aimed to appease the consumer
49	12/03/2026 7:33 PM ID: 292691427	The current system is a joke. RCVS doesn't even impose its own rules and nobody appears to police the idiots.

16. What risks and concerns do you have regarding the future regulation of the professions?		
50	12/03/2026 7:58 PM ID: 292693121	The RCVS SHOULD REGULATE BUSINESSES AND VETS IT HAS BEEN AND CONTINUES TO BE USELESS AS A LEADER FOR THE PROFESSION - leave it to the veterinary politicians - BVA ETC Ensure good standards but understand most conversations and decisions made between owners and vets are private / not recorded so complaints are generally pointless
51	12/03/2026 8:23 PM ID: 292695114	That they will be no better, and possibly worse, than now.
52	13/03/2026 7:23 AM ID: 292707567	Too much enforced regulation and red tape
53	13/03/2026 8:52 AM ID: 292710740	There is currently considerable confusion within the profession about what constitutes regulation, professional leadership, and professional representation. Regulation is paramount because we are a regulated profession, so it is vital that good quality, but flexible and adaptive, regulation is in place to protect the public and animal health and welfare. However, good regulation works best when the professional registrants are set up to succeed, not simply caught out when they fail. The best way of setting up our professionals to succeed is through the professional leadership role of the Royal College and keeping both the leadership and the regulation under one roof maintains the synergy of the two. One of the reasons that this structure is misunderstood is because our representative body (the BVA) fails to grasp its role effectively and probably suffers from a conflict of interest in that it relies on income from corporate subscriptions, which limits its ability to hold those corporates to account on behalf of its members
54	13/03/2026 9:59 AM ID: 292716113	My main concern is who is going to take over regulation. To me RCVS was ok. Regarding post op qualifications RCVS was offering and stopped them. There are other providers but I don't think they are as good as RCVS was. Also I do not think that the public was or is confused. The system was working fine. Yes the vet act has to change slightly but I do not want other organizations to take over the profession because they will destroy it. Vets must be regulated by vets and that is it for me.
55	13/03/2026 10:29 AM ID: 292718595	I am concerned about the cost of membership increasing and becoming more of a burden on veterinary practices without the Royal College delivering anymore for the increased fees. I think that currently the RCVS has a very poor reputation for it's ability to regulate the profession currently and I am concerned that it either doesn't have the power to regulate properly or is constrained by the legal system to be able to regulate properly. There needs to be much more accountability within the RCVS. I also think that it is very difficult from a practicing vets perspective to know what unintended consequences there are with the different options going forwards.

16. What risks and concerns do you have regarding the future regulation of the professions?		
56	13/03/2026 11:10 AM ID: 292722267	The current public perception of the Veterinary profession appears to be at an all time low. Certainly the respect of the general public towards veterinary professionals is the lowest I have known in my 20 year career so far. Future regulation and reform of governance must be made with the view of restoring the respect that our clients have for us as veterinary professionals. Without that restoration of a more functional relationship based on trust and respect we will lose more and more talented individuals from the profession.
57	13/03/2026 11:30 AM ID: 292725166	regulation is key to maintain standards, however over-regulation can lead to fear and distrust. Regulation should be aiming to work with veterinary and associated professions to maintain standards, not looking to punish or judge
58	13/03/2026 2:54 PM ID: 292743303	Risks - leadership aspect becomes sidelined due to regulatory processes taking priority. complexity of regulating multiple professions making change management difficult
59	13/03/2026 6:01 PM ID: 292756779	If the RCVS continues to take on all the roles as we have seen with an increase in leadership items then this becomes confusing for both the public and the profession especially when other organisations such as the BVA could take on these roles.
60	13/03/2026 8:38 PM ID: 292763412	Very expensive for what RCVS does for us.
61	13/03/2026 9:42 PM ID: 292765307	I have no doubts or concerns re impartiality at the RCVS currently doing both roles and have never heard anyone else express this either. I didn't know this had ever been a concern until this survey.
62	13/03/2026 11:49 PM ID: 292767748	Lay person is going to end up regulating us, not worked for medics
63	14/03/2026 9:52 AM ID: 292774045	Changes may be driven by public/ government to appease some public opinion but not actually improve vets/ nurses support/ guidance. Need to see proposals of new VSA to assess what changes mean.
64	14/03/2026 9:58 AM ID: 292774076	My concern would be that with the ever widening range of how veterinary care is provided, a 'one size fits all' regulation wouldn't be appropriate.
65	14/03/2026 12:04 PM ID: 292777513	none

16. What risks and concerns do you have regarding the future regulation of the professions?		
66	14/03/2026 12:40 PM ID: 292778793	Over regulation, disproportionate regulation to negatively affect me in a smaller practice. Excessive increased costs. Muddying of the waters when it comes to the profession….we are vets, we belong to the Royal College of Veterinary Surgeons, NOT Veterinary Services.
67	14/03/2026 1:19 PM ID: 292779181	protecting RVNs
68	15/03/2026 10:31 AM ID: 292797501	Amln abundance of rules that are not relevant to the welfare of the animals for clients. I think it is vital to keep the focus on these areas rather than other business regulations. Guidance must be carefully considered to align with these factors whilst being practical to implement in general practice without inflicting additional barriers to accessing care stick at increasing client costs.
69	15/03/2026 10:43 AM ID: 292798120	Worry that Veterinary Surgeons are being sidelined. I think every practice should have an accountable permanent veterinary surgeon in situ.
70	15/03/2026 11:27 AM ID: 292799313	loss of elected officers would mean loss of accountability and trust the profession
71	15/03/2026 6:12 PM ID: 292809357	I don't know what the alternatives would be I do think that corporates should have to pay more to supporting this process
72	15/03/2026 7:08 PM ID: 292810687	Lack of balance - my answers above show what a regulator SHOULD do - not what I think is currently being delivered
73	16/03/2026 10:04 AM ID: 292828485	My concern is that regulation of the profession is handed to reduced experience panels/non veterinary field panels nwhi have experience of vets in the real working world. Also i am worried that if put out to 'tender' then the cooperate world would have more of a hold over the profession being able to pay their way in to be part of these things.
74	16/03/2026 10:31 AM ID: 292830313	That large corporate practices are regulated adequately now that we have moved away from a veterinary owned structure where the owner is directly regulated by the regulator.
75	16/03/2026 3:34 PM ID: 292862050	Concerned that RCVS of late has failed to weigh in on CMA process, feels like they have very much stayed quiet at a time where we rely on our professional governing body to advocate for us.

16. What risks and concerns do you have regarding the future regulation of the professions?		
76	16/03/2026 6:03 PM ID: 292877065	I would be concerned if there were no vets in it
77	17/03/2026 2:39 PM ID: 292936652	Regulated by persons with too little knowledge of the coalface.
78	17/03/2026 11:21 PM ID: 292976046	My concern can be likened to the disaster of widespread outsourcing of UK practice ownership to corporates - which IMHO has pulled focus away from best practice and onto finance and shareholders. I am worried that outsourcing regulation to a non-veterinary body could have unintended negative consequences.
79	18/03/2026 2:31 PM ID: 293023103	That we will be governed by non clinical vets/external people
80	18/03/2026 2:41 PM ID: 293023872	concern that regulation may be outsourced to a separate company that doesn't understand how the profession works!
81	18/03/2026 7:56 PM ID: 293051085	continuing confusion for most of the profession and the public!
82	18/03/2026 8:00 PM ID: 293051052	That veterinary surgeons will play no part in it A lot of people who know diddly squat about how the Veterinary Profession should work will be in control without qualification or ability
83	18/03/2026 8:18 PM ID: 293052143	Time to consider all options
84	18/03/2026 10:40 PM ID: 293057192	The cost is a worry, and also the concern it may end up worse than what we have in place now.
85	19/03/2026 9:21 AM ID: 293089126	Taking regulation out of the hands of vets would mean that individuals, who do not necessarily have much experience of the profession, have the power to regulate. As seen with the CMA investigation, sweeping generalisations made about the profession are damaging.

16. What risks and concerns do you have regarding the future regulation of the professions?		
86	19/03/2026 11:43 AM ID: 293113749	Corporates have far too much influence with the RCVS at the moment and I only see that getting worse. I didn't like the suggested changes to the disciplinary process with potentially vets not being the majority on the disciplinary board
87	19/03/2026 1:29 PM ID: 293129849	The current regulation is purely individual based, the RCVS regulates the vet as an individual professional. This approach was probably appropriate when only vets could own a veterinary practice and most practices were small and independent. But this is no longer the case. Regulation needs now to also apply to the employer as the balance of power has now shifted in many veterinary practices.
88	19/03/2026 2:31 PM ID: 293140179	Lack of knowledge from those outside the profession for example like the CMA
89	20/03/2026 6:44 AM ID: 293204433	We need to be regulated appropriately but spurious complaints by aggrieved members of the public need to be dealt with effectively
90	20/03/2026 9:27 PM ID: 293269382	That third parties will have too much power over regulation. These people may not understand the industry and so may make inappropriate decisions or not make the right considerations.
91	21/03/2026 7:19 AM ID: 293281030	Balancing the needs of the public for independent disciplinary vet panel vs the desire of the profession to have an contextualised understanding regulator
92	22/03/2026 11:14 AM ID: 293240250	I have a concern that he status quo changes and regulation of the profession is done by a government body

answered	92
skipped	104

10.Solutions to ensure legislative reform is successful

17. What solutions do you believe would be helpful to ensure the Legislative reform is successful?

Answer Choices		Response Percent	Response Total
1	Open-Ended Question	100.00%	83

1	10/03/2026 7:10 PM ID: 292492915	Crystal clear separation of regulatory vs prof leadership roles. Ensure ''Lead Profession'' status for vets in 1ry legislation - in form of guaranteed practitioners on board (min 2) and defined points of consultation and approval - e.g. decisions on scope of Acts delegated to new AVPs. Changes to these. New AVPs becoming regulated. This is not entirely from a protectionist standpoint from the profession but with a view to maintaining a profession with a suitable breath and depth of expertise in animal health is maintained.
2	10/03/2026 7:50 PM ID: 292495897	I think it would be good to split out the regulatory function because then the college can be a strong spokesperson organisation for the profession, an help to promote and robustly defend us. At the moment I don't think it manages to do that at all because it is way more focused on being a regulator and customer champion. Not only is it focused, it is conflicted with the two roles. The voice then gets fragmented into a multitude of smaller organisations. Nb my practice has been running for 20+ years but I only took it on this year so the current company is less than one year. I don't know how to answer that question earlier.
3	10/03/2026 8:41 PM ID: 292500570	General Vet Council. Those who want to deliver animal care must be regulated and pay for the privilege
4	10/03/2026 9:08 PM ID: 292502020	I believe the status quo should stay, however if the functions are to be split the RCVS should regulate and the leadership roles can be carried out by BVA and the specialist divisions
5	11/03/2026 12:03 AM ID: 292510916	Communication, communication, communication
6	11/03/2026 8:04 AM ID: 292520311	Wish I knew!

17. What solutions do you believe would be helpful to ensure the Legislative reform is successful?		
7	11/03/2026 8:27 AM ID: 292520733	Retain election of council. Review disciplinary procedure making realistic timescales and restore faith amongst vets that frivolous and vexatious complaints are dealt with speedily and without ridiculous stress on the vets.
8	11/03/2026 9:05 AM ID: 292523372	Clear standards & qualifications for all allied services to ensure that regulation of these can then effectively come under the umbrella of a single veterinary services regulator (which I believe should continue to be the RCVS)
9	11/03/2026 10:30 AM ID: 292528636	Clear segregation of essential core standards which are regulated versus additional supplementary standards which are desired. Less gray areas within guidance. Legislation that is for for purpose and future flexibility to keep updating with modern practices.
10	11/03/2026 3:35 PM ID: 292567313	Veterinary business would be accountable to the professional bodies
11	11/03/2026 3:35 PM ID: 292567348	Wide ranging consultation and all decisions are explained and justified in advance of a second consultation. A bit like the CMA enquiry so that all unintended consequences are explored in advance of the legislation being put on statue book.
12	11/03/2026 3:37 PM ID: 292567417	Comprehensive consultation. Not doing too much at once (1 allied profession at a time?)
13	11/03/2026 7:20 PM ID: 292589299	Simplify the offering. Allocate more resources to regulation. Streamline professional services and divest areas to others where duplication occurs. Clearer comms, define targets , PSA oversight, more efficient and effective delivery of regulation.
14	11/03/2026 7:46 PM ID: 292591098	Veterinary businesses are regulated and where appropriate have professional responsibility to ensure the quality of veterinary care.
15	11/03/2026 8:05 PM ID: 292591871	Publicising the fact that reform will increase administrative costs to businesses and customers. Addressing the issues surrounding veterinary medicines cost/availability/requirement to supply vs generics
16	11/03/2026 8:34 PM ID: 292593775	I would like it to be made clear from the outset what it actually is that needs to be fixed and why, because Ido not know the answer to this. Only when the problem and the task is clear, can the process and the people be found to repair it. Short answer….much, much more clarity and honesty regarding the purpose of all of this.

17. What solutions do you believe would be helpful to ensure the Legislative reform is successful?		
17	11/03/2026 8:47 PM ID: 292594284	That there is an onus on the practice to ensure standards are met and the practice can be penalised for making Veterinary Surgeon's do things which are against the code. That if a practice registers an animal they must be able to provide 24hr care for it, specific to the species. There are many practices across the country that have a single part time exotic animal veterinary surgeon who takes on exotics cases and even advertise seeing exotics but when that vet is not available or they are closed they or their OOH provider refuse to see the animal. I regularly receive phone calls from people all around the country calling me because there is no one available to see an exotic pet in their part of the country. I also regularly see animals who are registered elsewhere locally but when they have an emergency out of hours their registered practice or OOH provider refuses to see them.
18	11/03/2026 9:09 PM ID: 292596808	More education and opportunity for the profession to feedback in a simple and time efficient way.
19	11/03/2026 9:20 PM ID: 292597157	I would like there to be clear understanding of funding and where subscription fees go to, if this means we have an increase in fees (for regulatory and professional bodies) then that's ok. (It would be massively helpful to allow this to be paid monthly by direct debit as well by the way, rather than the current annual situation). I think that having a GVC and then RCVS type arrangement would be my preferred solution, but it doesn't seem as though this is an option?
20	11/03/2026 11:26 PM ID: 292601836	Regulation of businesses as well as members. Foresight. Imagination.
21	12/03/2026 6:29 AM ID: 292608121	Enough time, listen to the professionals, keep the politicians on a short lead
22	12/03/2026 6:30 AM ID: 292608091	The proposed reform charts the demise of the Veterinary Profession and replaces it with an ill-defined (and a yet unfunded) QUANGO.
23	12/03/2026 6:35 AM ID: 292607779	1. Proportionate, evidence-based regulation Regulatory changes should be proportionate and focused on addressing clear risks to animal welfare, professional standards and consumer confidence. Reforms should avoid unnecessary administrative requirements that do not directly improve outcomes. 2. Clear scope of practice for the veterinary team Legislation should clearly define the roles and responsibilities of veterinary surgeons, veterinary nurses and other members of the veterinary team. This will enable effective delegation while maintaining patient safety and professional accountability. 3. Regulation of veterinary businesses with fair implementation Introducing oversight of veterinary businesses could improve transparency around pricing,

17. What solutions do you believe would be helpful to ensure the Legislative reform is successful?		
		ownership structures and governance. However, any framework should be carefully designed to avoid placing excessive financial or administrative burdens on independent practices. 4. Protection of professional titles Legal protection of the title “veterinary nurse” would improve professional recognition and public understanding, ensuring that only appropriately trained and regulated individuals use the title. 5. Modern and supportive fitness-to-practise procedures Regulatory processes should prioritise learning, remediation and current competence rather than focusing solely on punitive disciplinary measures. This approach supports professional development and encourages openness about mistakes. 6. Ongoing engagement with practising professionals Veterinary surgeons, nurses and practice owners should remain closely involved in shaping the implementation of reforms to ensure the new framework is practical and workable in real clinical environments. 7. Phased implementation with clear guidance Introducing reforms gradually, with clear guidance and adequate transition periods, will allow practices time to adapt while maintaining continuity of care for patients and clients. As a veterinary nurse and JV practice owner, I support the modernisation of veterinary legislation. However, it is essential that reforms remain practical, proportionate and supportive of the veterinary workforce while maintaining high standards of animal welfare and client trust.
24	12/03/2026 7:19 AM ID: 292609060	moving to fitness to practice which will be supportive and regulation of veterinary businesses is massive , if RCVS stays as a royal college that regulates , its structure/function must be communicated better . Royal college activities and regulator activities should be more obviously branded separately ... I think this is a massive opportunity to improve understanding, improve the concerns about the disciplinary process and get the profession better engaged in the RCVS. Even if elected positions are loss (which for regulator arm I agree for lots of reasons including the confusion it creates that council represents the profession as elected rather than regulates) , 20% turn out shows how disengaged the profession is , so this must a spring board to change that
25	12/03/2026 8:33 AM ID: 292611891	Owners of veterinary businesses need to be accountable in some way, whether they are vets or not.
26	12/03/2026 9:23 AM ID: 292615132	Keep changes simple, clear and easily communicated. I read the bios of the RCVS council when I voted, and even as someone who owns a veterinary practice, I struggled to make sense of the complexity of structure and language in the RCVS sphere. Lots of unfamiliar words made me feel confused and disconnected - simple language, short communication documents, use videos - people will watch a 2-3 minute video but won't read a 400 page document. Look at the CMA comms and do the opposite! :)
27	12/03/2026 11:19 AM ID: 292630495	Keep it focused on patient care and safety and registered personnel's compliance and competence.

17. What solutions do you believe would be helpful to ensure the Legislative reform is successful?		
28	12/03/2026 11:55 AM ID: 292636520	A united profession when this gets to drafting stage Maintaining self regulation but being able to demonstrate that effectively There is a fairly simple fact that we need excellent transparent governance with the right people with the right skills and attitudes appointed to a Governing Board
29	12/03/2026 12:10 PM ID: 292639254	Speaking to small independents as well as the huge corporates.
30	12/03/2026 12:41 PM ID: 292643103	There must be discussion with representatives from the whole profession, Business owners, corporates, vet and nurses in equal measure. The CMA investigation has been dominated by corporate input. Which has fueled public mistrust of what once was an upstanding profession.
31	12/03/2026 12:42 PM ID: 292643946	we have waited 60 years for this, please let the legislative reform be modernised so it will be as future proof as possible. My concern is that the RCVS do not want to change
32	12/03/2026 1:52 PM ID: 292654724	Stringent board selection, future proofing. An initial trial / impact assessments performed, consulting with those on the ground.
33	12/03/2026 1:53 PM ID: 292654605	Good engagement with professional bodies, and industry. Care with comparing industry to other professions (such as medicine) as the size of the industry and issues faced are not comparable, along with the risks to the public of poor regulation (ie medicine/law have large human risks, whereas vet is smaller human and financial risk of poor practice). Overtly tight regulation will lead to increased costs to clients, with questionable improvements in carw
34	12/03/2026 2:15 PM ID: 292657510	Listen to vets in practice - we want it to work- it isn't at the moment
35	12/03/2026 3:15 PM ID: 292666271	Massive input Pivot from rcvs to provide the regulation And RCVS looks after advancements in care and professional development
36	12/03/2026 3:38 PM ID: 292668821	They need to look at fee structures. And how corporates are profiteering. The RCVS has allowed this to happen. As a result trust in the veterinary profession has massively eroded. All the CMA has done for small independent like me is to send more clients to online pharmacies. Most of whom are owned by corporates

17. What solutions do you believe would be helpful to ensure the Legislative reform is successful?		
37	12/03/2026 3:39 PM ID: 292669380	Please focus on the professionals and associates who do the work, not the people who profit from it.
38	12/03/2026 3:59 PM ID: 292670808	That the Veterinary industry across all sections are listened too
39	12/03/2026 4:34 PM ID: 292676222	Put it to the membership vote
40	12/03/2026 4:40 PM ID: 292677100	be able to dictate to business owners - allow a new act that can be reformed as times progress. maintain an elected RCVS council of MRCVS/RVN
41	12/03/2026 5:33 PM ID: 292681769	Creation of a straightforward clear structure
42	12/03/2026 6:13 PM ID: 292685198	Separate the academic development side of the rcvs from the disciplinary council but ensure people from within the veterinary sector remain involved so unfounded allegations can be more rapidly rebuffed
43	12/03/2026 6:37 PM ID: 292686865	Any changes should ensure that the numbers or proportion of veterinary surgeons involved in running the different aspects of RCVS work are not reduced.
44	12/03/2026 6:59 PM ID: 292689089	Prioritize the animal being treated
45	12/03/2026 7:33 PM ID: 292691427	Very strong and tough love. Vets have effectively lost their place in society brocade if ill minded discipline, profiteering and bad disrespectful behaviour of some. The only method I would support to even up the playing field before retirement is a return to some serious discipline imposed by some serious people and just drop all the woke bullshit DIE, etc. Let some other sap do all that nonsense and return the profession to its rightful place in society. Anything less in my view will just fail and promote the decline of the profession.
46	12/03/2026 7:58 PM ID: 292693121	The RCVS SHOULD STICK TO REGISTERING VETS ENSURING GOOD EDUCATIONAL STANDARDS AND RINNING DISCIPLINE

17. What solutions do you believe would be helpful to ensure the Legislative reform is successful?		
		EVERYTHING ELSE SHOULD BE OUTSOURCED BUT EITH NO LEGISLATIVE POWERS - too much legislation already
47	13/03/2026 7:23 AM ID: 292707567	Keep RCVS role to misconduct / fitness to practice
48	13/03/2026 8:52 AM ID: 292710740	Combat the disinformation that currently exists so that professionals understand the dual roles of the college and how there is synergistic benefit of maintaining a status quo
49	13/03/2026 9:59 AM ID: 292716113	Don't know
50	13/03/2026 10:29 AM ID: 292718595	I would find it useful if the proposed options were presented as examples or predictions of how each option would work and the likely pros and cons and estimated costs of each option.
51	13/03/2026 11:10 AM ID: 292722267	The legislation somehow needs to bridge the divide that is building within the profession. The misinformed notion that Corporate practices are "Bad" and Independents are "good" that is currently being peddled by many independent practices and thus being jumped on by numerous social media personalities and the general media. Legislative reform needs to properly recognise that Corporate practices and Independents must all be judged and treated the same ensuring equality across the board. There are advantages and disadvantages on both sides of the Corp/Indy divide and we will only restore the public's faith in our profession if we put an end to pointless infighting.
52	13/03/2026 11:30 AM ID: 292725166	Separation of regulation and professional services does make sense, however it is a very costly process and who is going to pay for that? Many professional services that the RCVS currently provides are available from other sources and are often of better quality
53	13/03/2026 2:54 PM ID: 292743303	Time spent on ensuring excellent governance, and robust processes. Safeguards against future changes/complexities.
54	13/03/2026 6:01 PM ID: 292756779	It will have to involve at least 50% of lay personal when dealing with disciplinary cases preferably with a KC as its chair rather than a vet.
55	13/03/2026 8:38 PM ID: 292763412	Take off all powers from RCVS

17. What solutions do you believe would be helpful to ensure the Legislative reform is successful?		
56	13/03/2026 9:42 PM ID: 292765307	Listening to clinical members of the profession since they make up the majority or registrations.
57	14/03/2026 9:52 AM ID: 292774045	Full consultation from members, taking into account public needs
58	14/03/2026 9:58 AM ID: 292774076	The reforms need to look at protecting the veterinary profession from outside 'non veterinary' influences. This would ensure that the client is getting the best treatment not just the most profitable for shareholders. The legislation should also look to protect students from being unduly influenced throughout their studies from the larger groups.
59	14/03/2026 11:24 AM ID: 292776651	Protection of the VN title
60	14/03/2026 12:04 PM ID: 292777513	no opinion
61	14/03/2026 12:40 PM ID: 292778793	Clear regulation over paraprofessionals and clear distinction over roles in practice. Pricing structures that reflect size of practice, no loopholes for corporate owned practices.
62	14/03/2026 1:19 PM ID: 292779181	separate professional body to audit RCVS
63	15/03/2026 10:31 AM ID: 292797501	Leave the veterinary regulation to professionals (veterinary and other) who understand the needs and requirements, allowing other bodies to take over other aspects of management and leadership.
64	15/03/2026 10:43 AM ID: 292798120	A permanent responsible vet accountable in every practice and if no permanent vet then practice should not open.
65	15/03/2026 6:12 PM ID: 292809357	We need to think about how all this is funded. The consumer as always has to foot the bill of the extra costs on the industry - but how is that distributed Ultimately, I really believe we need a proper shake up of pet ownership. One should have a license to own a dog and pay an annual fee to support the costs of

17. What solutions do you believe would be helpful to ensure the Legislative reform is successful?		
		regulating the veterinary profession, disposal of offensive dog waste, legal investigations and prosecutions for breaches of the animal welfare act etc
66	16/03/2026 10:04 AM ID: 292828514	separating any attempted overlap with the CMA review
67	16/03/2026 10:31 AM ID: 292830313	A system to control non veterinary surgeon owners of practices to ensure that standards of service are regulated.
68	16/03/2026 6:03 PM ID: 292877065	I think separating the regulating function makes sense but ther must be vets in charge of the process
69	17/03/2026 2:39 PM ID: 292936652	separating regulation clearly, perhaps using regulator in the title of the body.
70	17/03/2026 11:21 PM ID: 292976046	Perhaps we just need clearer public guidance on how RCVS approaches regulation. And the fact that vets & nurses do respect standards and live in constant fear of falling short.
71	18/03/2026 2:41 PM ID: 293023872	Consultation with as many vets in the profession as possible. Positive communication to the general public regarding the improvements that are being made.
72	18/03/2026 7:56 PM ID: 293051085	Wide ranging change to ensure everyone had to take notice and be involved. Separation of professional and regulatory roles - feel BVA, SPVS, BCVA, BEVA, VMG etc already doing more for the professional roles and are the preferred first port of call for most vets
73	18/03/2026 8:00 PM ID: 293051052	Keep Vets who work in all the different parts of the profession really well represented in numbers
74	18/03/2026 8:18 PM ID: 293052143	Deep consultation
75	18/03/2026 10:40 PM ID: 293057192	No idea

17. What solutions do you believe would be helpful to ensure the Legislative reform is successful?		
76	19/03/2026 9:21 AM ID: 293089126	Having a Royal College who regulates helps with this. The RCVS need to be more proactive with this.
77	19/03/2026 10:24 AM ID: 293093960	Ensure that in a corporate owned practice non veterinary board members/ senior managers can be culpable if ta disciplinary incident occurred as a result of instruction from a more senior lay person
78	19/03/2026 11:43 AM ID: 293113749	Vets should be the top decision maker in a practice, not a non clinical manager. Vets also need to be being judged by vets in disciplinary matters not farriers or vet nurses (although vet nurses would be better than farriers!)
79	19/03/2026 1:29 PM ID: 293129849	A compulsory standard scheme. however this should be limited to clinical and statutory requirements, that is not governed by a moral or social ethos like sustainability.
80	19/03/2026 2:31 PM ID: 293140179	Full and open consultation with the profession , changes to be delivered over time with broad consensus within the profession
81	20/03/2026 6:44 AM ID: 293204433	Openness and consultation within the profession and oversight from suitable lay people
82	20/03/2026 9:27 PM ID: 293269382	Better utilisation of RVNs
83	21/03/2026 7:19 AM ID: 293281030	I'm aware that most countries have had this issue so assessing the success of their approaches would be sensible. The public will always suspect the profession of being too expensive. But it's important that the profession maintain its good standards and reputation

answered	83
skipped	113

Appendix B: Summary of Key Risks and Concerns (Qualitative Responses)

Theme	% approx.	Illustrative quote
Loss of veterinary-led regulation / professional identity	~50%	"Regulated by persons with too little knowledge of the coalface."
Over-regulation / bureaucracy	~45%	"Too much enforced regulation and red tape."
Cost increases / economic impact	~40%	"Very expensive for what RCVS does for us."
Governance, accountability & loss of trust	~35%	"Loss of elected officers would mean loss of accountability and trust."
Corporate influence / imbalance of power	~30%	"Financial leverage… being used to steer rules in favour of LVGs."
Complexity, confusion & lack of clarity	~28%	"Confusion within the profession of where current members answer to."
Current system dissatisfaction (fitness to practise, inefficiency)	~27%	"Current RCVS model not fit for purpose and takes too long."
Risk to clinical autonomy & animal welfare focus	~25%	"Too much emphasis on bureaucracy taking away autonomy of practices."
Allied professions integration risks	~22%	"Bringing regulation… will create confusion and be difficult to enforce."
Workforce & retention pressures	~20%	"Additional bureaucracy could reduce time available for patient care."
Regulatory overreach into business vs individuals	~18%	"Vets carry the can for problems not of their making."

Key Insight:
There is a **strong and consistent concern that reform could unintentionally weaken the veterinary profession's identity, autonomy, and leadership**, particularly if governance structures dilute professional input or increase bureaucracy without clear benefit.

Appendix C: Updated Summary of Proposed Solutions (Qualitative Responses)

Theme	% approx.	Illustrative quote
Maintain veterinary-led regulation (with appropriate lay input)	~48%	"There must be vets in charge of the process."
Clear separation of regulation vs professional leadership	~45%	"Crystal clear separation of regulatory vs professional leadership roles."
Proportionate, outcomes-focused regulation	~40%	"Avoid unnecessary administrative requirements."
Improved governance & accountability (skills-based boards)	~35%	"Stringent board selection… consulting with those on the ground."
Stronger engagement & consultation with the profession	~32%	"Listening to clinical members of the profession."
Cost transparency & fair funding model	~30%	"Clear understanding of funding and where subscription fees go."
Regulation of veterinary businesses (not just individuals)	~28%	"Owners of veterinary businesses need to be accountable."
Clarity of roles within the veterinary team	~25%	"Clear scope of practice for the veterinary team."
Simplification & improved communication	~23%	"Keep changes simple, clear and easily communicated."
Phased, pragmatic implementation	~20%	"Phased implementation with clear guidance."
Protection of professional titles and standards	~18%	"Protection of the veterinary nurse title."

Key Insight:
Respondents are not resistant to reform per se — but there is a clear expectation that reform must be **practical, proportionate, profession-led, and transparently governed**, with a strong emphasis on **clarity and trust-building**.