

Council Meeting

Meeting to be held on Thursday, 7 November 2024 at 10:00 am in the Rosalind Paget Room, Royal College of Nursing, 20 Cavendish Square, London W1G 0RN

| Agenda | Classification ¹ | Rationale ² |
|-----------------------------------------------------------------------------------------------|-----------------------------|------------------------|
| 1. President's introduction | Oral report Unclassified | n/a |
| 2. Apologies for absence | Oral report Unclassified | n/a |
| 3. Declaration of interests | Oral report Unclassified | n/a |
| 4. Minutes of the remote decision held 21-27 August and meeting held 11 September 2024 | | |
| i. Unclassified minutes | Unclassified | n/a |
| ii. Classified appendix | Confidential | 1, 2, 3, 4 |
| 5. Matters arising | | |
| a. Obituaries | Unclassified | n/a |
| b. Council correspondence | Oral report Unclassified | n/a |
| c. CEO update | Oral report Unclassified | n/a |
| 6. Matters for decision by Council and for report (unclassified items) | | |
| a. Discretionary Fund | Oral report Unclassified | n/a |
| b. TRNOV Scheme conclusion | Unclassified | n/a |
| c. RCVS governance reform | Unclassified | n/a |

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| <p>7. Reports of standing committees – to note</p> <p><u>Please note:</u> all unclassified minutes from standing committee meetings will be found as part of the <i>following</i> meeting's papers for the respective committees, see: https://www.rcvs.org.uk/who-we-are/committees/ and navigate to the specific committee from there.</p> | | |
| Advancement of the Professions Committee | Oral report Unclassified | n/a |
| Audit and Risk Committee | Oral report Unclassified | n/a |
| Education Committee | Oral report Unclassified | n/a |
| Finance and Resources Committee | Oral report Unclassified | n/a |
| Registration Committee | Oral report Unclassified | n/a |
| Standards Committee | Oral report Unclassified | n/a |
| Veterinary Nurses Council | Oral report Unclassified | n/a |
| PIC/DC Liaison Committee | Oral report Unclassified | n/a |
| <p>8. Reports of statutory committees – to note</p> | | |
| a. Preliminary Investigation Committee | Unclassified | n/a |
| b. RVN Preliminary Investigation Committee | Unclassified | n/a |
| c. Disciplinary Committee and RVN Disciplinary Committee | Oral report Unclassified | n/a |
| <p>9. Notices of motion</p> | Oral report Unclassified | n/a |
| <p>10. Questions</p> | Oral report Unclassified | n/a |
| <p>11. Any other College business (unclassified)</p> | Oral report Unclassified | n/a |

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|-----------------------------------------------------------------------------------------------------------------------------|------------------------------------|----------------------|
| 12. Risk Register, equality and diversity (unclassified) | Oral report Unclassified | n/a |
| 13. Date of next meeting Thursday, 16 January 2025 at 10:00 am (remote) | Oral report Unclassified | n/a |
| 14. Matters for decision by Council and for report (confidential items) | | |
| a. Update on major projects | Oral report Confidential | 1, 3, 4 |
| b. CMA update | Oral report Confidential | 1, 2, 3, 4 |
| c. Budget 2025 | Confidential | 1, 2, 3 |
| d. Reporting against vital signs | Confidential | 1 |
| e. RCVS Council lay member re-appointment process | Confidential | 1 |
| f. RCVS Strategic Plan 2025 – 2029 | Oral report Confidential | 1 |
| 15. Any other College business (confidential items) | | |
| a. Comments on classified appendices | Oral report Confidential | 1, 2, 3, 4, 5 |
| b. Other business | Oral report Confidential | 1, 2, 3 |
| i. RCVS accreditation of veterinary programmes in the European Union | | |
| ii. Registrar recruitment – update | Oral report Private | 1, 5 |
| 16. Risk Register, equality and diversity (confidential items) | | |
| | Oral report Confidential | 1, 2, 3, 4, 5 |
| Dawn Wiggins Secretary, RCVS Council 020 7202 0737 / d.wiggins@rcvs.org.uk | | |

¹Classifications explained

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|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Unclassified | Papers will be published on the internet and recipients may share them and discuss them freely with anyone. This may include papers marked 'Draft'. |
| Confidential | Temporarily available only to Council Members, non-Council members of the relevant committee, sub-committee, working party or Board and not for dissemination outside that group unless and until the relevant committee or Council has given approval for public discussion, consultation or publication. |
| Private | The paper includes personal data which should not be disclosed at any time or for any reason, unless the data subject has agreed otherwise. The Chair may, however, indicate after discussion that there are general issues which can be disclosed, for example in reports to committees and Council. |

²Classification rationales

| | |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Confidential | <ol style="list-style-type: none"> 1. To allow the Committee or Council to come to a view itself, before presenting to and/or consulting with others 2. To maintain the confidence of another organisation 3. To protect commercially sensitive information 4. To maintain public confidence in and/or uphold the reputation of the veterinary professions and/or the RCVS |
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Terms of Reference**The vision of the Royal College of Veterinary Surgeons [as agreed in the current strategic plan]**

1. Our vision is to be recognised as a trusted, compassionate and proactive regulator, and a supportive and ambitious Royal College, underpinning confident veterinary professionals of whom the UK can be proud.

Role of the Royal College of Veterinary Surgeons [derived from the Charter]

2. The objects of the Royal College of Veterinary Surgeons, as laid down in the Supplemental Charter granted on 17 February 2015 to the Royal Charter of 1844, ie:

- a. To set, uphold and advance veterinary standards, and to promote, encourage and advance the study and practice of the art and science of veterinary surgery and medicine, in the interests of the health and welfare of animals and in the wider public interest.
- b. The Charter also recognises those functions provided for in the Veterinary Surgeons Act 1966, in terms of the regulation of the profession, and also recognises other activities not conferred upon the College by the Veterinary Surgeons Act or any other Act, which may be carried out in order to meet its objects, including but not limited to:
 - i. Accrediting veterinary education, training and qualifications, other than as provided for in the Act in relation to veterinary surgeons;
 - ii. Working with others to develop, update and ensure co-ordination of international standards of veterinary education;
 - iii. Administering examinations for the purpose of registration, awarding qualifications and recognising expertise other than as provided for in the Act;
 - iv. Promulgating guidance on post-registration veterinary education and training for those admitted as members and associates of the College;
 - v. Encouraging the continued development and evaluation of new knowledge and skills;
 - vi. Awarding fellowships, honorary fellowships, honorary associateships or other designations to suitable individuals;
 - vii. Keeping lists or registers of veterinary nurses and other classes of associate;
 - viii. Promulgating guidance on professional conduct;
 - ix. Setting standards for and accrediting veterinary practices and other suppliers of veterinary services;
 - x. Facilitating the resolution of disputes between registered persons and their clients;
 - xi. Providing information services and information about the historical development of the veterinary professions;
 - xii. Monitoring developments in the veterinary professions and in the provision of veterinary services;
 - xiii. Providing information about, and promoting fair access to, careers in the veterinary professions.

The purpose of RCVS Council [derived from the Charter]

3. It is laid down in the Charter that the affairs of the College shall be managed by the Council as constituted under the Act. The Council shall have the entire management of and superintendence over the affairs, concerns and property of the College (save those powers of directing removal from, suspension from or restoration to the register of veterinary surgeons and supplementary veterinary register reserved to the disciplinary committee established under the Act) and shall have power to act by committees, subcommittees or boards and to delegate such functions as it thinks fit from time to time to such committees, subcommittees or boards and to any of its own number and to the employees and agents of the College.
4. The Council is also responsible for the appointment of the CEO and Registrar, and the ratification of the Assistant Registrars. The appointment of the Registrar will be undertaken in consultation with the Chief Executive. Appointment of all other staff members is the responsibility of the CEO and relevant members of the Senior Team.

5. A strategic plan is developed and agreed by Council to facilitate the delivery of these activities and to ensure ongoing development and quality improvement.
6. A delegation scheme that outlines how Council's functions are managed via system of committees and other groups is agreed annually by Council.

How Council members work

7. In order to enable the Royal College of Veterinary Surgeons to fulfil its vision, and to discharge its functions under its Royal Charter and the Veterinary Surgeons Act 1966, RCVS Council members will:
 - a. Abide by the Nolan Principles of Public Life;
 - b. Work in the best interests of the public, and of animal health and welfare and public health;
 - c. Respectfully listen to the voices of the professions, the public and other stakeholders, and reflect them in discussions where appropriate, ensuring they are put into context;
 - d. Neither be answerable to, nor represent, any group of individuals;
 - e. Support the College's vision and work towards the success of the College and its functions;
 - f. Live the College's values;
 - g. Act at all times in a constructive, supportive and compassionate manner;
 - h. Exercise a duty of care to the staff employed by the College, working through the CEO and Registrar;
 - i. Recognise the importance of a collegiate atmosphere where robust discussion is welcomed in the formation of policy and multiple points of view are listened to and respected;
 - j. Respect and support the decisions made by Council when communicating externally;
 - k. Communicate College activities and positions to relevant stakeholders;
 - l. Abide by the Code of Conduct for Council and Committee members.

| Summary | |
|--------------------|------------------------------------------------------------------------------------------------------------------------|
| Meeting | Council |
| Date | 11 September 2024 |
| Title | Minutes of the remote decision held 21 – 27 August 2024, and the meeting held on 11 September 2024 |
| Summary | Minutes of the remote decision held 21 – 27 August 2024, and the meeting held on 11 September 2024 |
| Decisions required | To approve the unclassified minutes and classified appendix. |
| Attachments | Classified appendix (confidential) |
| Author | Dawn Wiggins Secretary, Council 020 7202 0737 / d.wiggins@rcvs.org.uk |

| Classifications | | |
|------------------------|-----------------------------------|-------------------------------|
| Document | Classification¹ | Rationales² |
| Paper | Unclassified | n/a |
| Classified appendix | Confidential | 1, 2, 3, 4 |

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Council

Remote decision made 21 – 27 August 2024 on the RCVS Meeting Paper System: Board Effect

Members:

Miss L S Belton (in the Chair)

Dr L H Allum

Mrs B S Andrews-Jones

Professor D C Barrett

Dr S E Bennett

Mr D Bray

Dr A L Calow

Mr J M Castle

Dr D S Chambers

Mrs O D R Cook

Ms L Ford

Dr M M S Gardiner

Mrs S D Howarth

Mr T M Hutchinson

Professor M D Jones

Dr Z J Kennedy

Professor C M Loughrey

Mrs C-L McLaughlan

Dr A J McLeish

Professor T D H Parkin

Dr S Paterson

Mr T J Walker

Mr W A S Wilkinson

Ms J S M Worthington

Recruitment of temporary (fixed-term contract) additional Assistant Registrar / Head of Legal Services

1. Council was asked to approve that an Assistant Registrar / Head of Legal Services be hired on a temporary basis whilst the permanent Registrar / Director of Legal Services role was being filled. It was noted that, whilst it was only the Registrar that was appointed by Council, it was considered good practice for Council to have input on Assistant Registrar appointments as well. There were two decisions made:
 2. Council was asked if it was content with the rationale behind the introduction of the new fixed-term role:

| | |
|---------------|----|
| For: | 21 |
| Against: | 0 |
| Did not vote: | 3 |
 3. Mrs Cook submitted an email vote which was included in the figures.
 4. The fixed-term role was approved by a majority vote.

5. Council was asked to approve the recommendation from the recruitment panel for the candidate as detailed at Annex B to the **private and confidential** paper:

| | |
|---------------|----|
| For: | 21 |
| Against: | 0 |
| Did not vote: | 3 |

6. Mrs Cook submitted an email vote which was included in the figures.
7. The recommendation was approved by a majority vote.

Council Meeting and RCVS Knowledge Annual General Meeting

Meeting held on Wednesday, 11 September 2024 at 10:00 am in the Annie Altschul / Agnes Hunt Room, Royal College of Nursing, 20 Cavendish Square, London W1G 0RN

Members:

Miss L S Belton (in the Chair)

Dr L H Allum

Mrs B S Andrews-Jones

Professor D C Barrett

Dr S E Bennett

Mr D Bray

Dr A L Calow

Mr J M Castle

*Dr D S Chambers

Mrs O D R Cook

Ms L Ford

Dr M M S Gardiner

Mrs S D Howarth

Mr T M Hutchinson

Professor M D Jones

Dr Z J Kennedy

Professor C M Loughrey

Mrs C-L McLaughlan

*Dr A J McLeish

Professor T D H Parkin

*Dr S Paterson

Mr T J Walker

Mr W A S Wilkinson

Ms J S M Worthington

*Denotes absent

In attendance:

Miss H Alderton

Senior Events Officer

Ms A Alexandre

Executive Assistant (EA) to CEO

Ms M Bawn

RCVSK Knowledge (RCVSK) Trustee (RCVSK AGM and RCVSK update items only)

Miss J L Beckett

VN Council (VNC) member and RCVSK Trustee (RCVSK AGM and RCVSK update items only)

Mr L Bishop

Media and Publications Manager (open session only)

Ms A K Boag

Chair, RCVSK Board

Ms V Bolton

Research Manager

Miss E A Branscombe

RCVSK Trustee (RCVSK AGM and RCVSK update items only)

| | |
|------------------|-----------------------------------------------------------------------|
| Dr M A Donald | RCVSK Trustee (RCVSK AGM and RCVSK update items only) |
| Ms J Gallant | EA to RCVSK CEO and RCVSK Governance Officer |
| Ms L Hall | People Director |
| Mr I A Holloway | Director of Communications |
| Mr M Knight | RCVSK Trustee (RCVSK AGM and RCVSK update items only) |
| Ms L Lockett | CEO |
| Mr J Loeb | <i>Veterinary Record</i> |
| Ms K Mantell | RCVSK CEO |
| Ms C L McCann | Director of Operations |
| Mr B Pound | RCVSK Trustee (RCVSK AGM and RCVSK update items only) |
| Mr A Quinn-Byrne | Governance Manager |
| Ms J Shardlow | Chair, RCVS Audit and Risk Committee |
| Dr C P Sturgess | RCVSK Trustee (RCVSK AGM and RCVSK update items only) |
| Mr A Webb | <i>Veterinary Times</i> |
| Ms N Widdowson | Head of Veterinary Policy, Animal and Plant Health and Welfare, Defra |
| Mrs K Young | VNC member and RCVSK Trustee (RCVSK AGM and RCVSK update items only) |

President's introduction (taken out of order)

8. The President welcomed guests and outlined the order of the meeting.

RCVS Knowledge Annual General Meeting

9. RCVS Knowledge Trustees had received their papers in August 2024; the minutes would be recorded separately to the RCVS Council minutes herewith.

RCVSK CEO update

10. As it was her first update to Council, the RCVS Knowledge (RCVSK) CEO provided Council with her brief work background. She then provided Council with an update of the work undertaken by RCVSK:
11. As the charity partner of the College, the RCVSK's mission was to advance the quality of care for the benefit of animals, the public and society. It did that in three main areas:
 - translate evidence: so that professionals could put that into practice;
 - foster Quality Improvement: in care;
 - curate veterinary history: to celebrate and share the profession's history.

Translating evidence

12. The cornerstone of that was the Library and Information Service (LIS) that the RCVSK provided, with:

- 1,600 members;
- 800,000 searches carried out on the discovery platform in the last year;
- access to 152 veterinary and animal science journals;
- training and support for literature services;
- resources for in practice journal clubs;
- support for refugees and statutory examination candidates;

- production of its journal watch '*InFocus*' with a team of volunteer clinical reviewers that looked through more than 100 journals to pull out the most relevant articles with summaries, with over 9,500 subscribers;

- publication of the *Veterinary Evidence* peer reviewed journal, which was run with a grant from the College, that approached c.70,000 users. Thanks were given to Dr Kit Sturgess who had stepped down as Editor-in-Chief at the end of his term and a welcome was given to Professor Peter Cockcroft who had replaced him. There were some exciting plans to expand the scope of articles published and working closely with the RCVS Fellowship;

- peer mentorship programme for peer reviews: matching an experienced peer reviewer with a peer reviewer undertaking a review for the first time, as an initiative to help diversity and increase the group of reviewers.

Fostering Quality Improvement (QI)

13. Key work over the past year was to drive forward the adoption of QI across the veterinary professions, providing support, inspiration and tools for doing so. There had been new resources for the professions:

- new issue of QI box set: an online learning platform, freely available. Series 7 included: 'Patient safety – introduction to human factors and systems thinking'; experts from the veterinary field and human health had worked together on that resource;

- launched and ran two successful QI in a day events: each bringing together 40 – 50 individuals to learn more about QI and gain in-depth knowledge;

- table / checklist shared on the website around veterinary early warning scores. That had been one of the most popular and well used resources;

- RCVSK QI awards: the College was thanked for hosting the award ceremony as part of RCVS Day in July; it was important to recognise individual and group achievements and to raise the profile of that type of work, to inspire others and show how it was possible to take small steps to improve and work together as a team to improve quality of care;

- Canine Cruciate Registry (CCR): national registry incorporating Client-Reported Outcome Measures; to date 1,300 surgical reports from 139 surgeons and 109 different breeds of dog. There was international interest in that work;
- National Audit for Small Animal Neutering (NASAN): reporting on complications and neutering procedures and their impact. Data had been collated from 63,000 cats, dogs, and rabbits; 256 veterinary practices; with a resource hub with evidence and articles to improve outcomes;
- active involvement in One Health: over the past year, RCVSK had built on its work on supporting responsible antimicrobial stewardship, including farm vet champions – an online training platform for farm vets about responsible use of antimicrobials, in partnership with Veterinary Medicines Directorate (VMD). In addition, there was further learning for companion animal and equine vets on the same topic. That had been endorsed as part of the Government's five-year action plan on antimicrobial resistance and had been named as a key initiative being carried out by the veterinary sector. It was a global issue and one in which RCVSK could play a supporting role;
- contextualised care: taking into account all of the different contexts in which care was delivered; RCVSK had a resource hub on its website that pulled together evidence and information resources on the topic;
- conversation guides that were intended to be used in consultations between veterinary professionals and owners. These were produced in conjunction with a wide range of veterinary professionals, with input and feedback from animal owners.

Curating veterinary history

14. RCVSK was the proud custodian of the RCVS archives and historical collections. Whilst preparing to move into the new Hardwick Street premises, it had focussed on:

- the digital use of resources and sharing on social media, sometimes by using interesting snippets, and at other times by using more in-depth items looking at a particular issue in history and how it played out in the relevance of veterinary care in modern times;
- updates to the veterinary history website – scheduled for relaunch in the coming months;
- working with College colleagues in preparation for ensuring space in the new premises to display historical items;
- the 2023/24 Plowright Prize, in memory of Walter Plowright and from a very generous legacy left to RCVSK, had been awarded to microbiologist and poultry health specialist Professor Fiona Tomley. This was in the form of £100,000 prize money in order to set up a global mentoring network for infectious disease researchers with a focus on One Health.

What was next for RCVSK?

15. A new strategic period was approaching for 2025 – 2029. A meeting was scheduled with trustees to discuss strategic focus; the intent was to:

- stay true to its mission of seeking continued improvements to quality of care;
- consolidate efforts to increase the reach of the largely freely available resources offered to the professions;
- work hard on measuring the impact of work; and,
- seek to leverage additional funding sources to ensure future financial resilience.

16. The RCVSK CEO drew the presentation to a close and thanked Council, the College, and its volunteers for the continued support and partnership.

RCVS Council Meeting

Welcome to new members

17. Professor Barrett, Dr Bennett, Dr Kennedy, and Professor Loughrey were welcomed to their first Council meeting.

Apologies for absence

18. Apologies for absence had been received from:

- Mr Bray (from c.3:45 pm)
- Dr Chambers
- Dr Paterson
- Dr Middlemiss (Observer)

19. Mr Bray, Professor Loughrey, and Mr Wilkinson joined the meeting remotely. Dr McLeish was not in attendance.

Declaration of interest

20. Dr Calow declared that she had accepted a part-time permanent position at Willow Veterinary Centre, owned by IVC Evidensia.

Minutes

21. Council had had the opportunity to comment electronically on the unclassified minutes and classified appendices of the various meetings and remote decision held between 6 June and 9 July 2024 and they were before Council for approval.

22. There was no dissent, comments made, or amendments to the minutes, which were accepted as a true record of the meeting by a unanimous verbal vote.

Matters arising

Obituaries

23. There had been no written obituaries received. Council, staff and guests stood for a minute silence for all members of the professions that had passed since it last met.

Council correspondence

24. The President reported the following matters:

National Honours

25. The following people had received recognition in King Charles' Birthday Honours List:

- Dr David McKeown MRCVS was awarded an OBE for services to the veterinary profession;
- Jasmin Paris MRCVS was awarded an MBE for services to fell and long-distance running;
- Anthony Fooks, lead scientist at the Animal and Plant Health Agency, was awarded an OBE for services to animal health and welfare;
- Faith Clark, lately life Vice-President at Hearing Dogs for Deaf People, was awarded an MBE for services to deaf people;
- Doreen Graham, lately board member and trustee, Edinburgh Dog and Cat Home, was awarded an MBE for services to animal welfare; and
- Eileen Evans from Lancaster and Morecambe Cat Rescue charity was awarded an MBE for services to the protection of cats.

26. Congratulations were given to all of the worthy recipients.

RCVS Honours and Awards

27. The nomination period for RCVS Honours and Awards to be presented at RCVS Day in 2025 was due to open shortly; the deadline for submissions was mid-December.

Declarations of interest

28. Members were thanked for confirming that their declarations were correct, or for making changes. Council was reminded of the importance of ensuring declarations were kept up to date and that, from next year, they would be asked to complete the form again, on an annual basis, to ensure all changes were captured.

Availability requests for meetings

29. There had been feedback that there was increasing difficulty in gathering responses to requests for availability for meetings via polls / emails, etc. Council was asked to inform their respective committee secretaries as soon as possible when such requests go out because a meeting may not be quorate otherwise. At the College end, the secretaries would be asked to put a time limit to respond by, with prompt follow up so that dates were not held indefinitely.

30. It was further requested that, when a meeting had hybrid functionality, the relevant secretary be informed as soon as possible when members intended to join remotely, as it had a knock-on effect for catering; room hire costs; health and safety; and security.

CEO update

31. The CEO introduced the update and highlighted the following:

- there had been a lot of engagement and outreach activities undertaken both in person, and virtually to seek thoughts on key projects from members of the professions and other stakeholders;
- the governance consultation had been launched post-June Council and had since closed. There had been a reasonable number of responses, with 734 individual responses, and 28 organisation responses received. These were currently going through an external specialist agency and results would be put before Council at its November meeting for discussion. It was emphasised it was not a referendum, nor a 'numbers game', and that the College was really interested in the details of people's opinions, to help inform change;
- work continued on the final items from the Survey of the Professions, and noted that it had taken a long time for the research reports to be finalised; publication of the reports was expected in October;
- as reported briefly at the June meeting, there had been an Artificial Intelligence (AI) roundtable in May that brought together people from the profession, researchers, educationalists, specialists, etc. The College had now published its report online, from which various workstreams had been generated: Standards Committee would consider regulations around the use of AI; the Advancement of the Professions (AP) Committee would consider what the College might need to do to stimulate culture to be ready for working with new technology in a competitive fashion; the Ethics Review Panel would be made aware of the sorts of questions and areas of interest it should be considering when there were applications relating to AI; and Education Committee would ensure that competences continued to embrace new technology and, in addition, would support the veterinary schools in understanding how assessments might need adjustments to ensure that things that could not be undertaken by AI would be measured.

Another consideration was that, if the College was to say to the profession to use its professional judgement – the same as it would with anything where there was a human in the loop – it might be questioned how the data was gathered in order to reassure the College that the tools being used were appropriate, as AI in the veterinary medicine sector was not regulated;

- a neurodiversity workshop had taken place towards the end of the 2023-2024 Presidential year by the AP Team to consider how the College could better support young veterinarians and students that had neurodiversity and reasonable adjustments that might need to be made for example for extra-mural studies (EMS) at veterinary practices;

- the AP Team had also published a landmark study on chronic illness and disability within the professions, in conjunction with British Veterinary Chronic Illness Support (BVCIS). The Team was now working through the report to consider what the data actually meant for the professions and its potential impact;
- work continued on the Veterinary Clinical Career Pathway (VCCP) workstreams, which looked at: specialism within general practice; how to better articulate all of the roles within clinical practice; and the accessibility of specialist status. There had been two in-person workshops held to date, in London and in Edinburgh;
- the College had been promised by the Conservative Government that it would make sure momentum was maintained regarding the College's push for new legislation, and notes provided to ensure recognition of the importance of it. The new government team was aware, and work continued;
- from an overall College perspective, workload remained very high and there was a lot of ongoing projects: the new building; a new Customer Relationship Management (CRM) System; a new Content Management System (CMS) (website). Work also continued relating to the Competition and Markets Authority (CMA) investigation into veterinary services for household pets in addition to 'business as usual' and the streams of strategic work;
- there had been a Staff Away Day the previous week with the theme of 'Better Together'. Staff attended four breakout sessions from a choice of six and it was heartening to see a huge amount of energy and commitment from the team. The sessions were entitled: coming together at Hardwick Street; working together with technology; better together when we belong; what we can achieve together; better together...as a Royal College that regulates; and, working together in a high-performance team: learning derived from sporting environments;
- monitoring resource mapping continued, with the resourcing being allocated as appropriately as possibly.

32. It was questioned how the extra workload was being managed, and whether there was a requirement for extra support? What was being done in teams to promote and bring in new roles and take up some of the workload; particularly as the Registrar had retired at RCVS Day? The CEO confirmed that additional help had been approved by Council in the form of the new Head of Legal Services (HoLS) / Assistant Registrar that had joined the College on 4 September, and that recruitment to replace the Registrar continued. The human resource budget was the biggest expenditure, and consideration was being given to how best resource certain projects in the short term.

33. The update was noted.

Matters for decision by Council and for report (unclassified items)

Discretionary Fund

34. The Director of Operations (DoO) reported that the Discretionary Fund was a provision in the annual budget of £150,000 that could be used for projects that could not be budgeted for when it was put together, and to expedite activities during the year that were identified in the period. There were processes in place to ensure the expenditure was in accordance with the College's financial controls and, where relevant, followed the Project Protocol.
35. It was noted that there had been no new applications since the last meeting, and those approved to date had amounted to c.£126,000 for a variety of projects, and there was c.£23,000 left in the current year's provision.
36. There were no comments, and the update was noted.

Review of Public Advisory Group (PAG)

37. The Chair, PAG, introduced the paper and provided Council with some background information. The Group was set up because the College worked in the public interest, and it had made sense to involve the public in the work the College undertook. There were more than 30 members who had applied to join the group; there was an eclectic mix, including small holders, small animal owners, a guinea pig enthusiast, a shepherdess, and farm animal and equine owners; and each virtual meeting had approximately 22 – 25 members attending. They were very engaged, thoughtful and had provided great input.
38. The main current workstream was to provide feedback on the existing animal owner section of the College's website and the types of advice that should be included on a new iteration of it. The Director of Communications (DoComms) had provided draft content, which had been reviewed by the PAG and an updated version would return to the group in due course.
39. There had been a detour from that work when the College was informed of the CMA investigation, which became the subject of one meeting. The Group was asked if the priorities of the CMA resonated with them, and members had provided some really interesting content that was subsequently fed into the RCVS CMA Working Group. They had also had the RCVSK CEO join the group for the most recent meeting, who sought to gain feedback on the RCVS Knowledge content and had asked 'what did good quality care look like to them?'. The Chair PAG encouraged others to think about how they could use that group of people within the different areas of the College.
40. Returning to the paper, it was noted that the Group was initially planned to run on a 12-month pilot but, as that had passed very quickly and they were still in the middle of the workstream, Council was asked if there could be a six-month extension and a review thereafter.
41. Comments and questions included, but were not limited to:
- if the Group continued for a further six months, was it worth returning to Council with an updated remit and terms of reference to keep it as an ongoing project?

- the Chair and CEO were to meet to discuss the best way forward for the Group and how to encourage new membership as, whilst there was diversity in devolved nations and age ranges represented, there were always improvements that could be made, and it would bring in fresh perspectives. There was interest in holding smaller focus groups to really dig down into certain areas, but it had been a great start and feedback from current members would also be sought. Regardless, the Group was considered to be very important to the College, especially following the CMA investigation and the potential outcomes;
- there was mention that work had diverged from its original basis when the CMA report came in;
 - it was important to have an underlying mission for the Group so that they saw that they were contributing to a project through to the end; 'shouting into a blank space' was unrewarding. A benefit had been the speed of information gathered, and having set projects would be really important.

Long-term planning was required; the Group had been set up with three initial objectives: to help the College understand what was on the mind of the public; to test messaging within the website and other communications to ensure they landed appropriately; and to refine the services offered by the College to members of the public. For example, how did they engage with the College around complaints and how was the information accessed. The review in six months' time would help to define whether it was the right vehicle for getting the public voice into the room; if the format was working; and if its members were (and remained) representative of a typical animal owner 'in the street';

- when the review was brought back to Council, it would be useful to capture the impact(s) made. For example, whether they had fed into the CMA investigation, or changed the content on the website – it was important to build into the future and the evaluation of impact, but also to consider a feedback loop to the Group in terms of members understanding what the College had done with their contributions. It was important to have a continued commitment to the public and to demonstrate to, for example, to the CMA how the information was being used;
 - feedback was being provided to the RCVS CMA Working Groups but agreed there needed to be a more formal link back to the members of PAG;
- it felt it should be a permanent structure of the College; using people in different modes was really good so that there were not always 25 people at any one time, but rather in smaller groups; or some people might be happy to review documents in their own home in their own time – adjustments could be made, and rolled into plans for turnover of membership;
- the debate in six months should not be 'should the Group continue?' but rather 'how to get the best out of the Group?' – members should feel listened to and be given feedback, particularly if something had not been taken up, otherwise people would just walk away;

- there was an argument that the College could probably have worked out the same outcome given time if it was in touch with the public, and the profession on the ground; but that there was a public group undertaking the work provided credibility to drawing those conclusions. Going forwards when there were periods of less need, rather than winding down the Group, could there be a retainer system? Also, what was the number of individuals in the group and, given the positive responses received from members, was there an opportunity to use some of them to go out into their respective communities to communicate their experiences of the College – to use it as an outreach opportunity to communicate outwards as well as gathering information inwards;
 - o it was tricky as the College did not know about their specific circumstances, although, based on the fact that they were working with the College, it was hoped that good things were being said. It was interesting that the College was starting to identify members of the Group that were very good at proofreading whereas others came back with a strategic view; talent was appearing that could be utilised in smaller group settings. There were originally 34 members in the 'pool' (one had since dropped out due to personal circumstances), with 20-25 attending per meeting;
- it was encouraging that membership was not made up of entirely pet owners but was there any sub-section that was felt to be under-represented, for example, horse owners that formed a bridge between companion animal and large animal, or small holders that had a variety of animals?
 - o farmers or production animal owners might be under-represented, but there was the potential to recruit for specific gaps if required or if there was a particular issue to be addressed; current members had been very good at stepping up in discussions and saying 'this was a farmer's voice, so you need to consider / listen to this'; the spread was not perfect because of limitations on the types of potential members that had applied for the role;
- there was a world of difference between a farmer that made a living from livestock and a small holder that had a cow; it did sound as though the Group had a small animal focus and possibly commercial farmers should be represented, or others that kept animals commercially (or even those with no animals at all) – the veterinary public health role had an impact on everyone that ate or interacted with animal produce and just recruiting members that had pets would be a mistake. However, with the CMA focus and pieces of work currently undertaken, a small animal bias was considered relevant;
- future iterations of the composition should include geographical representation from the four devolved nations;
 - o the Group currently had members from Scotland, Wales, and Northern Ireland as well as some with accessibility issues, but it was limited by who applied – it was hoped when recruitment took place a second time that there would be more knowledge about the Group and that would encourage more diversity;

- membership of the Group should be turned over to prevent them being 'institutionalised'. They should not go out to their communities as that was not their purpose particularly if there was turnover. That the College was trying to work on client expectations was really helpful to the profession.

42. The discussion was brought to a close.

Mr Walker briefly left the room.

43. Council was asked if it was content with the Group beyond the initial 12-month period and to review the Group after the first workstream had ended and that there should be a plan for the next stage of the Group. It was clarified that it was for a further six months and that the review and plan would come to March 2025 Council:

44. There was no dissent. The time extension, review and plan were agreed by a unanimous verbal vote (of the members present).

Mr Walker returned to the room.

Notices of motion

45. There had been no notices of motion received.

Questions

46. There had been no questions received.

Any other College business (unclassified items)

Standards Committee (SC) papers

47. The President reported that a request had been received from the Committee following its May 2024 meeting to ask whether Council still wished to receive SC papers via password-protected email (as well as Committee members via the meeting paper system, Board Effect), particularly as papers for other committees were not sent to Council directly. It was noted this was an historical decision due to the nature of the issues that SC discussed, and that it was an anomaly outside of the agreed RCVS Delegation Scheme.

48. It was noted that the minutes of the Committee were loaded to Board Effect and were visible to the entirety of Council, but the nature of the system meant that it was not possible to put all members on Council into the membership the Committee within the system because of how the electronic voting was used. This did not stop any member of Council requesting papers or asking

to observe a specific meeting (noting that observers were not permitted to actively take part in discussions without a Chair's permission and were not allowed to vote on any decision).

49. It was commented that the College had an approved Delegation Scheme, so it was unnecessary to receive SC papers when no other committee operated in the same manner. It was further commented that it would be useful to have a notification whenever minutes were added to the system, and it was confirmed that that did already happen and was called a 'daily digest' notification emailed directly from the system.

50. It was agreed the practice of emailing SC papers would discontinue as being surplus to requirements.

51. There was no other business to report.

Risk Register, equality and diversity (unclassified items)

52. There were no items raised to add to the College's Risk Register.

Date of next meeting

53. The next scheduled meeting of Council was Thursday, 7 November 2024, commencing at 10:00am and reconvening in the afternoon. The meeting would be held in person at the Royal College of Nursing.

Matters for decision by Council and for report (confidential items)

Update on major projects (confidential)

54. This information is available in the classified appendix at paragraphs 1 – 19.

Competition and Markets Authority (CMA) update (confidential)

55. This information is available in the classified appendix at paragraphs 20 – 32.

Ms Ford left the meeting

RCVS Strategic Plan development (confidential)

56. This information is available in the classified appendix at paragraphs 33 – 93.

Any other College business (confidential items)

Comments on classified appendices (confidential)

57. There were no comments on the classified appendices (as indicated in paragraph 94 of the classified appendix).

Other business (confidential)

58. This information is available in the classified appendix at paragraphs 95 – 102.

Mr Bray left the meeting

Risk Register, equality and diversity (confidential items)

59. This information is available in the classified appendix at paragraph 103.

60. The President drew the meeting to a close.

From: [Luke Bishop](#)
To: [Luke Bishop](#)
Cc: [Jan Holloway](#); [Abi Hanson](#)
Subject: RCVS news: RCVS pays tribute to former President and inaugural Queen's Medal winner
Date: 16 September 2024 13:57:51

Dear all,

Following the sad news of the death of former RCVS President Des Thompson OBE, please find below a short press release paying tribute to Des.

A picture of Des outside Buckingham Palace in October 2014 after receiving the inaugural RCVS Queen's Medal can be downloaded from here: <https://flic.kr/p/pim9qk>

Kind regards,

Luke Bishop
Media & Publications Manager
T. 020 7202 0784
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RCVS news: RCVS pays tribute to former President and inaugural Queen's Medal winner

Following the death of former Royal College of Veterinary Surgeons (RCVS) President Des Thompson OBE, the College has paid tribute to the Northern Ireland-based veterinary surgeon, known for his advocacy on behalf of the region, the professions and on mental health issues.

Des was a member of RCVS Council for almost a quarter of a century (from 1980 to 2004), serving as President of the RCVS, as well as Chair of the RCVS Trust (now RCVS Knowledge), in 1995-96. He also served as RCVS Treasurer from 1990 to 1993 and was Chair of the RCVS Veterinary Nurses Committee, the precursor to Veterinary Nurses Council.

After leaving RCVS Council he continued to remain active in veterinary politics and life, particularly in Northern Ireland, becoming a champion for mental health support and helping, via his involvement in Veterinary Northern Ireland, to set up the Vet Support NI confidential mental health support service which has funding support from the RCVS Mind Matters Initiative.

Des was the inaugural recipient of the RCVS Queen's Medal, an award reserved for veterinary surgeons with particularly distinguished and consequential careers, in 2014. The Queen's Medal had been approved by the late Queen Elizabeth II and Des had the opportunity to visit Buckingham Palace to be formally presented with his medal by the Queen in October 2014.

Paying tribute, current RCVS President Linda Belton said: "We are very sorry to hear of the passing of Des Thompson. Des had been a stalwart of the UK veterinary professions, particularly in Northern Ireland, for many decades and will be greatly missed by many veterinary surgeons and veterinary nurses.

“As well as serving on RCVS Council, Des had served as president of the British Small Animal Veterinary Association, the Society of Practising Veterinary Surgeons and the Northern Ireland Veterinary Association and was also involved with the Federation of Veterinarians of Europe, arranging for one of its general assemblies to be held in Belfast.

“The sincere admiration and respect for Des can be demonstrated by the fact that he was actually nominated twice for the inaugural Queen’s Medal, and we were very glad to be able to recognise his commitment to the professions through the award.

“On behalf of the Councils and staff of the RCVS, I send my sincere condolences and warmest wishes to Des’s wife Rosalie, his family and friends, and all his many colleagues past and present, during this difficult time.”

ENDS

NOTES FOR EDITORS

The RCVS is the regulatory body for veterinary surgeons and registered veterinary nurses in the UK and sets, upholds and advances veterinary standards, so as to enhance society through improved animal health and welfare.

For more information, please contact:

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Communications Department, Royal College of Veterinary Surgeons

| Summary | |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Meeting | Council |
| Date | 7 November 2024 |
| Title | Temporary Registered Novice Official Veterinarian (TRNOV) scheme |
| Summary | This paper attaches a joint request from FSA, FSS and DAERA asking RCVS Council to allow their respective TRNOV schemes to continue. The paper sets out the background to this request and the relevant timeline, as well as attaching extracts from minutes of meetings where this matter has been discussed previously. |
| Decisions required | <p>Council is asked to consider the joint paper presented by FSA, FSS and DAERA at Annex I and decide whether the RCVS should continue to allow those who meet the criteria of the respective schemes to be admitted to the temporary register.</p> <p>If so, Council is asked to further decide:</p> <ol style="list-style-type: none"> a. whether it wishes to impose a further time-limit; b. the frequency of reviews, if any. |
| Attachments | <p>Annex A – Extract from minutes of RCVS Council meeting, March 2021</p> <p>Annex B – Summary of registration and temporary registration provisions under the Veterinary Surgeons Act 1966</p> <p>Annex C – FSS scheme criteria</p> <p>Annex D – DAERA scheme criteria</p> <p>Annex E – Extract from minutes of RCVS Council meeting, June 2023</p> <p>Annex F – Extract from classified appendix to the minutes of RCVS Council meeting, June 2023 (confidential)</p> <p>Annex G – FSA update paper to RCVS, June 2024 (confidential)</p> <p>Annex H – Extract from classified appendix to minutes of Standards Committee meeting, June 2024 (confidential)</p> <p>Annex I - Joint paper from FSA, FSS and DAERA, October 2024</p> |

| | |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>Annex J – FSA letter to RCVS confirming outcome of tender exercise</p> <p>Annex K – Letter re TRNOV scheme (confidential)</p> |
| Author | <p>Gemma Kingswell</p> <p>Head of Legal Services (Standards)</p> <p>g.kingswell@rcvs.org.uk / 020 7965 1100</p> |

Classifications

| Document | Classification ¹ | Rationales ² |
|----------|-----------------------------|-------------------------|
| Paper | Unclassified | n/a |
| Annex A | Unclassified | n/a |
| Annex B | Unclassified | n/a |
| Annex C | Unclassified | n/a |
| Annex D | Unclassified | n/a |
| Annex E | Unclassified | n/a |
| Annex F | Confidential | 2, 3 |
| Annex G | Confidential | 2, 3 |
| Annex H | Confidential | 2, 3 |
| Annex I | Unclassified | n/a |
| Annex J | Unclassified | n/a |
| Annex K | Confidential | 2 |

¹Classifications explained

| | |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Unclassified | Papers will be published on the internet and recipients may share them and discuss them freely with anyone. This may include papers marked 'Draft'. |
| Confidential | Temporarily available only to Council Members, non-Council members of the relevant committee, sub-committee, working party or Board and not for dissemination outside that group unless and until the relevant committee or Council has given approval for public discussion, consultation or publication. |

| | |
|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Private | The paper includes personal data which should not be disclosed at any time or for any reason, unless the data subject has agreed otherwise. The Chair may, however, indicate after discussion that there are general issues which can be disclosed, for example in reports to committees and Council. |
|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

²Classification rationales

| | |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Confidential | <ol style="list-style-type: none"> 1. To allow the Committee or Council to come to a view itself, before presenting to and/or consulting with others 2. To maintain the confidence of another organisation 3. To protect commercially sensitive information 4. To maintain public confidence in and/or uphold the reputation of the veterinary professions and/or the RCVS |
| Private | <ol style="list-style-type: none"> 5. To protect information which may contain personal data, special category data, and/or criminal offence data, as listed under the General Data Protection Regulation |

Temporary Registered Novice Official Veterinarians (TRNOV) scheme

Introduction

1. The scheme allowing temporary registration of novice Official Veterinarians ('the scheme'), proposed by Defra and the Food Standards Agency (FSA), was first approved by RCVS Council in March 2021. As Council will recall, the purpose of the scheme is to address a veterinary workforce issue in delivering official controls in slaughterhouses. The scheme is intended to minimise disruption whilst meeting the requirements of the relevant legislation and ensuring food security.
2. Since its inception, the scheme has been kept under review by the RCVS via Council and the Standards Committee. During the time the scheme has been in operation, there have been two extensions and similar schemes have been approved for Food Standards Scotland (FSS) and Northern Ireland's Department of Agriculture, Environment and Rural Affairs (DAERA).
3. In June 2023, an 18-month extension was agreed by Council, meaning that the respective schemes come to an end on 31 December 2024. Council is therefore asked to consider the joint paper presented by FSA, FSS and DAERA and decide whether the schemes should continue beyond the end of this year.

Timeline

4. In March 2021, RCVS Council agreed to a 12-month 'time-limited' proposal by Defra/FSA to allow for the temporary registration of Official Veterinarians (OVs) providing meat hygiene controls in England and Wales. The minutes of this meeting are attached at **Annex A**.
5. The FSA 'activated' the scheme in June 2021 and a review was carried out by the RCVS Standards Committee in December of that year. In June 2022, RCVS Council was asked to consider an extension to the scheme, with ongoing six-monthly reviews by the Standards Committee. Council agreed to this request and the Standards Committee carried out reviews in December 2022 and May 2023 as per that decision.
6. The Standards Committee agreed to proposals for similar schemes by FSS and DAERA in February 2023 and February 2024 respectively.
7. In June 2023, FSA requested a further extension of three years. RCVS Council did not agree to this, and instead allowed an 18-month extension, again with ongoing reviews by Standards Committee.
8. Given that three schemes are now in operation, FSA, FSS and DAERA have been asked to take a joined-up approach and make any requests for further extensions together. The respective schemes are due to end on 31 December 2024.

Overview of the schemes

FSA scheme

9. When Council considered the original proposal from FSA and Defra in March 2021, the stated purpose was to address an anticipated severe veterinary resource issue post EU-Exit, specifically around delivery of official controls in slaughterhouses. The idea being that overseas veterinary surgeons who are not currently eligible to register as an MRCVS because they do not meet the English language requirements for registration (namely International English Language Testing System (IELTS) level 7) would have a route to do so, after working through the requirements of the scheme.

10. The original proposal as it relates to OVs providing meat hygiene controls was as follows:

We ask that the RCVS admit to its temporary register, vets who (i) have a contract of employment to work as an OV providing meat hygiene controls in England and Wales; (ii) have the necessary skilled worker visa including IELTS at level 5; and (iii) hold European Association of Establishments for Veterinary Education (EAEVE) accredited veterinary degrees and iv) have completed and passed the meat OV training course. The FSA would then authorise them as an OV on confirmation of their status as a temporary registrant.

This temporary registration would last for 12 months, with the possibility of an extension of six months, during which time the temporary registrant would be expected to pass the IELTS level 7 test. Whilst on the temporary register, the individual's role would be limited in scope and under the supervision of an MRCVS... similar to that of a novice OV. This would fall under the category of "employment", specifically "where vacancies for such roles cannot be filled".

We ask that this facility for temporary registration to undertake meat hygiene official controls be open for 12 months, to be reviewed jointly by Defra, the Welsh Government, the FSA and the RCVS after six months of operation.

11. To assist, a summary of the general position of registration and temporary registration under the Veterinary Surgeons Act 1966 (VSA) is attached at **Annex B**.
12. As Council is aware, TRNOVs who are part of the FSA scheme are not directly employed by the FSA, instead the service is outsourced to an external service delivery partner (SDP). The contract to deliver official controls has recently been out to tender, and the outcome of this exercise is discussed further below.
13. Council will recall the original proposals put forward in March 2021 also covered a contingency for TRNOVs to provide export certification services. While this was agreed by Council in principle, it was not 'triggered' and has never been put into operation. As it stands therefore, certification is not part of the TRNOV role although MsRCVS do rely on information provided by TRNOVs when completing certificates.

14. Whilst much of the scheme remains the same as when it was first implemented, there have been some significant developments:
- a. The minimum English language level has been increased to level 6 due to relatively low numbers of those entering the scheme at level 5 being able to attain level 7 within the required timeframe
 - b. The 'vet track' scheme has been introduced, which involves overseas veterinarians with EAEVE accredited qualifications and English language at IELTS level 5 working as Meat Health Inspectors (MHIs) while developing their English language skills to become MRCVS
 - c. FSA is no longer pursuing direct employment of OVs as a long-term goal
15. Further information about the duties of OVs, TRNOVs and official auxiliaries (e.g. Meat Health Inspectors) is set out in **confidential Annex G**, see pages 8-11.

FSS and DAERA schemes

16. The schemes being operated by FSS and DAERA mirror the FSA scheme in many ways, however Council should bear in mind the following:
- a. DAERA has not yet used the scheme and FSS has used it once (plus two further applicants should the scheme continue beyond December 2024)
 - b. Unlike the FSA, the FSS directly employs most OVs delivering official controls in Scotland
 - c. Whilst DAERA does directly employ OVs, if use of the scheme is required TRNOVs would be sourced through the same SDP as FSA
 - d. The English language requirement for the FSS scheme remains at IELTS level 5, unlike the FSA and DAERA schemes.
17. Neither FSS or DAERA requested, or were given, permission for TRNOVs to provide export certification services.
18. A summary of the entry criteria to the FSS and DAERA schemes are attached at **Annexes C** and **D** respectively.

Council meeting June 2023

19. The relevant extracts from the minutes of this meeting are attached at **Annex E** and **confidential Annex F**. By way of summary, the issues discussed included:

- a. Whilst the FSA maintained this was a temporary measure, it was acknowledged that finding an exit strategy was taking longer than originally envisaged – a three-year extension to the scheme was requested
 - b. The increased language requirement in the FSA scheme had resulted in greater success in temporary registrants achieving IELTS level 7 within the requisite timeframe
 - c. Continued concern that this approach would become the 'new normal'
 - d. The fact that this arrangement was only available in the public health sector and not other sectors that might also be experiencing shortages was noted
 - e. FSA confirmed that plans for direct employment of OV's were on hold due to budgetary and other practical considerations
 - f. Wider, cultural changes were required to make working in veterinary public health roles more attractive, measures such as paid extra-mural studies (EMS) were also discussed
 - g. The impact of the upcoming SDP retender process
 - h. The challenges to the industry and delivery of official controls if the TRNOV scheme did not continue
 - i. The relationship between the criteria for the schemes and whether the RCVS continues to recognise EAEVE accredited qualifications
 - j. Continuing concerns that the RCVS was effectively being held responsible for agriculture, trade and farming continuing with minimal disruption when its primary role is to uphold veterinary standards
 - k. The ongoing use of a single SDP with a model centred on using overseas veterinarians had resulted in damage to the culture of UK vets carrying out public health work
 - l. The feasibility of alternative options, such as a scheme encouraging vets in practice to take on OV work alongside their clinical work
20. Ultimately, Council agreed to an 18-month extension (i.e. until 31 December 2024) to align with the RCVS review of its decision around acceptance of EAEVE accreditation and recommended that the re-tender process for a new SDP be completed prior to the end of the that 18-month period.

Standards Committee review June 2024

21. At this review, the Standards Committee was asked to consider an update paper from the FSA and identify any areas it would like to see addressed or elaborated upon prior to any request for an extension to RCVS Council.
22. The update paper from the FSA is attached at **confidential Annex G** and the relevant extract from the minutes of this meeting is attached at **confidential Annex H**.

The current request from FSA, FSS and DAERA

23. A joint paper presented by the FSA, FSS and DAERA is attached at **Annex I**. As Council will see, the paper outlines the progress that has been made since the last time this matter was considered but ultimately seeks a continuation of the respective schemes so that those who meet the relevant criteria may enter the temporary register for the purpose of carrying out official controls where required.
24. By way of summary, points raised in the paper include:
 - a. There has been a significant decrease in reliance on TRNOVs, as demonstrated by the fact that 'bulk applications' of TRNOVs will no longer be required. Instead, if Council agrees that the schemes may continue, applications will be made on an individual, ad hoc basis
 - b. Increased awareness of OV roles through measures such as EMS programmes and career events, resulting in more domestically trained veterinary surgeons considering working in the public health sector
 - c. If Council agree to an extension, assurance is given that the schemes will only be used where other recruitment channels become insufficient or to fill positions 'during the transition to a new recruitment pathway' to ensuring continuity in service delivery
 - d. The underlying rationale for allowing the scheme to continue are cited as:
 - i. Ongoing uncertainties in veterinary resourcing
 - ii. Evolving government policies
 - iii. Potential impact of RCVS accreditation reforms on recruitment (i.e. recognition of EAEVE accredited qualifications)
 - iv. The effect of potential new suppliers entering the market following the contract retender
25. Since the attached paper was submitted, the results of the tender have been released with contracts being awarded to two suppliers. Details of this are set out in the letter at **Annex J**.

Points to consider

26. When this matter was first considered in March 2021, use of the temporary register in this way was completely novel. Historically, temporary registration for the purposes of employment has been used sparingly and generally limited to areas of specific expertise where the 'market' had not been able to fill a post. As such, there was concern that extending the remit would effectively create a 'two-tier' system of veterinarians. However, it was explained at the time that this was a temporary solution to a specific problem that would not become 'the new normal'. Council has also previously questioned whether it is appropriate for veterinarians who do not meet the RCVS' language requirements to be carrying out official controls given the importance and complexity of that role.
27. In terms of progress, use of TRNOVs has substantially decreased as compared with when the scheme was first implemented. Notwithstanding this, in the current paper, the RCVS is effectively being asked to give assurances that it will continue to admit to the temporary register those who meet the criteria of the FSA, FSS and DAERA schemes, albeit against a background of decreased reliance as demonstrated by the move from 'bulk' to ad hoc 'individual' applications.
28. When discussing the current proposal, Council may wish to consider the following:
- a. The effect on the delivery of official controls if support for the schemes is withdrawn
 - b. The language requirements for the FSA and DAERA schemes as compared with the FSS scheme
 - c. Whether the agreement in principle to TRNOVs carrying out export certification services should still stand given the time that has passed and the fact that this aspect has never been triggered
 - d. The significant progress that has been made in decreasing reliance on TRNOVs
 - e. The potential impact of the retender process on FSA and DAERA schemes which utilise the SDP
29. Council will also note the **confidential** letter at **Annex K**, which is attached for information.
30. It should be noted that if the schemes do continue, the operational impact of moving from 'bulk' to 'individual' applications may need to be considered by the RCVS Registration Committee and staff team.

Decisions required

31. Council is therefore asked to consider the joint paper presented by FSA, FSS and DAERA at **Annex I** and decide whether the RCVS should continue to allow those who meet the criteria of the respective schemes to be admitted to the temporary register.

32. If so, Council is asked to further decide:
- a. whether it wishes to impose a further time-limit;
 - b. the frequency of reviews, if any.

EXTRACT from March 2021 unclassified minutes

EU-exit – Temporary Registration

Dr Richards declared an interest: Council member of the Association of Government Vets and had undertaken Official Veterinarian (OV) training, but not currently working as an OV.

Dr Smith declared an interest: member of the Government Veterinary Service, though not directly involved in this matter.

Dr Tufnell declared an interest: he was currently undertaking the OV training offered by Improve on behalf of the Animal Plant and Health Agency (APHA).

1. The Registrar introduced the paper. She highlighted the following items:
 - Temporary Registration was intended to be used sparingly after other potential routes of registration had been exhausted and limited to areas of specific expertise where the 'market' had not been able to fill a post;
 - there were currently only nine veterinary surgeons on the Temporary Register; in an employed capacity;
 - by extending its remit there was the danger of 'drifting' and Temporary Registration becoming the 'new normal'; this would devalue its purpose and potentially lead to a two-tier system;
 - it was questioned how the proposal before Council would be time-defined – was it time-limited and what was the exit strategy?
 - Council had agreed previously English language requirements pre-EU-exit at International English Language Testing System (IELTS) Level 7, equivalent to e.g. doctors; the proposal in the paper was for Home Office visa requirements for skilled workers, and IELTS Level 5.
2. The main two areas of concern were:
 - Meat hygiene situation – this was more acute and immediate;
 - Export Health Certificates (EHCs) – having enough people to carry out this work; this was something that *might* arise.
3. The CVO thanked Council for the opportunity to present the proposal; the nature of the roles and tasks to be undertaken were outlined at Annex B to the paper before Council; it related to England and Wales only.
4. In food safety, the majority of vets working in that role were currently from the EU. When the process of registration of those workers was on the basis of Mutual Recognition of Professional Qualifications (MRPQ) it had been an automatic process. Post-EU-transition period, those veterinarians now required a visa and its related requirements; the ability to meet RCVS requirements; a contract; and, if they graduated from a European Association of Establishments for Veterinary Education (EAEVE) approved school, the OV training they were also expected to undertake and suitably pass.

5. The immediate concern was in abattoir work. The vets in those roles were the lowest paid and there were the problems created by Covid and the time taken to get a visa. It was not about using Temporary Registration for 'business as usual' or plugging gaps; it was an exceptional situation.
6. With the current export scheme of supermarket goods requiring EHCs to Northern Ireland approximately half were delayed by the movement of 'complex' goods that required full certificates – that requirement had been due to take effect from 1 April, but it was likely that current derogations would be extended to October 2021. Import controls into the UK had less impact but still required some certification in relation to certain checks being made. Whilst the actual number of certificates required was unknown, it had levelled out to approximately two-thirds of what was initially thought; but it should be kept in mind that there was still a period of turmoil with adjustments being made.
7. Regarding meat hygiene requirements, Temporary Registration for individuals would be for 12 months with a potential one-off extension period for up to six months during which time they would be expected to pass IELTS Level 7. The overall scheme would last a maximum of 12 months (with the possibility to extend for a further six months) though Defra / Food Standards Agency (FSA) / RCVS would review the situation after only six months to consider whether the underlying market issues remained the same.
8. Furthermore, work was ongoing with the Food Standards Agency (FSA) to promote the role of the OV: free training could be provided along with a number of activities to better understand the role; better marketing and consulting to be done on various aspects, such as splitting the role so it was not full-time but could instead be part-time as part of regular work.
9. Comments and questions included but were not limited to:
 - a small point of clarification: Annex B to the paper, heading 'Proposal' on page 2, first paragraph: it should read EAEVE approved *or accredited* schools;
 - what was being asked for was quite limited and within a strictly controlled area and IELTS level 5 with the commitment to build up to level 7 was a positive move; it should be remembered that Council also had the power to *remove* registration via this route (as opposed to only via the disciplinary process). There were examples of this with past FMD national needs and during the 2012 Olympic games held in London;
 - whilst understanding why this was before Council, what was being done to avoid the issue continuing indefinitely and why was there not more money put forward to encourage vets to work in this field e.g. a reduction in student debt for new graduates? It was understandable why this was being requested now, but what about the future?
 - o there were a lot of matters being considered, two key items were part-time contracts and new graduates. The FSA had contracts with their workforce supplier in this area, and a lot of new graduates did not understand what the role was;
 - o from a commercial aspect, the main point was to acknowledge that it was not a long-term 'new normal', it was an urgent, immediate need and a contingency plan. Insight and innovative ways of working would be taken on board to deliver the service in the future, but the operational transformation programme was in its early stages and would not happen immediately. Consideration was also being given to the current contract with the service delivery partner to the FSA regarding pay and career structures; support with visa

applications; and English language development; it had been advised that part-time OV work could be more attractive to UK vets. This proposal would be reviewed in six months' time;

- when volunteering for OV work in the South West [I] had been told it was not required – what would happen at the end of the maximum of 18 months if there was still a need? With the English language requirements being reduced for a specific need, should that not be considered for other areas that were struggling to recruit such as diagnostic imaging or pathology?
 - o for meat hygiene purposes there was a long-established mechanism (pre-EU-exit) for EU veterinary surgeons where they could work as official auxiliaries in the first instance and work up to OV status once practical training had been undertaken there was an exit route for the employer and the country but what it meant for an individual's visa would require another discussion;
 - o who was on the Temporary Register was at the College's discretion and it would decide what was appropriate under the particular circumstances at that time for the sector; the role; and the individual applications for Temporary Registration. There were nine members in total temporarily registered in the employed category; a few years ago, the Temporary Register had been reviewed and the people who had been extended for a long period were allowed to continue for a set time and given notice of what changes the College was making; each member on the Temporary Register was considered on an individual basis, not as a group;
- experience had shown that working in both red and white meat plants for 25% of the time did work and could be a long-term, more sustainable way, this work could embed, but it was appreciated that there needed to be a mechanism for 'surge capacity' under particular circumstances like there had been for FMD needs. However, it would be concerning if a vet on the Temporary Register for meat hygiene / abattoir work was then 'sucked into' EHC work as there was no parity in pay. Regarding EHCs, it was suggested this could be discussed in greater detail at the College's Certification Sub-Committee to consider intended and unintended consequences and bring it back to Council after looking at it in depth;
 - o the College had looked at the certification issues in broad terms post-EU exit sphere on an on-going basis;
- if the College allowed Temporary Registration of OVs to come in to certify, would the countries receiving the products accept them if they had been certified by a temporary registered OV?
 - o each slaughterhouse provided a daily attestation for each species slaughtered that confirmed that the animal health requirements (requisite for certificates further down the chain) had been met. Regarding the certificates e.g. for the sausage factory or lasagne production plant, where some of the requirements in the certificates related back to the abattoir, not just for food safety purposes: from an animal health perspective the attestation would certify requirements had been met; from an export perspective, the temporary registered OVs would not be used to certify for third countries other than the EU primarily because the arrangements for those countries were relatively bespoke and the government was obliged to have conversations when arrangements were changed. For the EU they would meet the definition of an OV able to certify for the EU; relatively few consignments went directly from the abattoir to the EU, most went on for further processing first where the certifying OV picked up those certificates;

- it was pleasing to hear that the key issues of pay and providing a resilient work force was being looked at and improved. However, there had previously been a network of farm animal practices that had provided what was now being aimed for: a network of part-time vets working in local abattoirs, that had provided the resilient workforce the industry and country had needed and had been geographically well-spread. It had been the government's decision to work with a service delivery partner whose business model relied on employing European vets at lower pay and lower working conditions than UK vets were prepared to work for, so the issue was of its own making. In view of that, assurances were needed on how to put the matter right and that any exemption should very much be in the short-term otherwise the problem would continue going forward.

Further, there were particular concerns about the English language being set at IELTS level 5; the training outlined looked excellent but would be of no use if the communication was not to a required standard. Level 5 was two levels lower than current requirements, and some of what the novice or temporary OVs were being asked to do would require high levels of English language, in particular, they are asked to act as a Witness of Fact and as a professional witness in legal cases including the production of witness statements;

- o it was worth noting that EU vets that had come into the UK were qualified to do the job in hand. With regards to English language, it should not be thought that because the vets accepted lower pay and came from the EU that they were not MsRCVS at that point. The government contract methods had been such because they were spending tax-payers' money and had to be seen to be getting value for money. Official controls and food safety still needed to take place and it was important for people in animal health and welfare, and in the supply chain, to carry out the work at suitable salaries. The market had not adjusted which was what the FSA was taking forward.

Regarding English language, at IELTS level 5 the Bristol training course was technical so there was confidence that, if the person had passed the Bristol course, they would have a suitable level of English, and important to note that they would have supervision. It was suggested that issues of communication in slaughterhouses were more around understanding accents and background noise;

- o regarding the pipeline of a resilient workforce, the FSA was embarking on an innovative operational programme, but was not currently able to say what the future model would look like as it still required consultation. The timeline of the initial engagement would assist in reassuring Council that it would be able to feed into a six-month review so it would be possible to see how this would come together and look at in a long-term sustainable way. OV communication skills were vital and needed to be as good as, or better, in an abattoir environment as general practice. The FSA was trying to ensure that the difficult conversations around audit, enforcement and stakeholder management, etc., had very detailed support from the OVs supervisor and the area veterinary manager – it was a robust framework that could be extended into a temporary registered OV role;
- who decided on the pay for the OVs, was it the government or the service delivery partner, as any additional pay would affect profits?
 - o the service delivery partner determined levels of pay; the FSA was working with them to see how they could support not just the pay, but the overall package, to make it more

attractive for recruitment and retention. A certain level of turnover was expected as people moved into different roles, but the four months to February in 2021 had three times the amount of turnover to the same period in 2020;

- there was discomfort in the creation of a role with a salary with a lower market rate and the concept of contracts needed so that people were tied to a company; that could lead to exploitative practices – what consideration had been given to that and what protection was there for the vets entering the UK on those contracts if the College agreed to it?
 - o the salaries and packages were on a par with other similar roles advertised e.g. TB auditors; and Food Standards Scotland (FSS) OVs. FSA was pushing to make it clear what only vets could do to add value and be respected in roles and that this was translated into appropriate remuneration. Regarding contracts, the FSA had received information and insight that tying to long-term contracts was viewed as a disincentive, which would be fed into discussions. For protection, part of the assurance that Temporary Registration would bring, was that once the vet had reached IELTS level 7 and become a full MRCVS they were able to leave the contract by giving notice and move on to other jobs but if they chose to. It was hoped that the package would look much more attractive, but it would not tie them in beyond the normal contractual arrangements and also that they would be under contract for the Temporary Registration position;
- as a member of the Registration Committee, [I] do not believe that Temporary Registration was the mechanism that should be being used as it did not fit the purpose. There was a mechanism for getting vets into the UK which was full registration. There was an English language requirement and maybe the College had got that wrong, as there were other roles that maybe needed a slightly lesser requirement than level 7 that might, in future, approach the College if this proposal was agreed and it would be difficult not to be sympathetic; the market in private practice would control the language requirements as most practices would want a satisfactory requirement to deal competently with clients.

The issue was certification and a huge failure to plan; one of the first things the College did after the Brexit vote was to have a roundtable meeting with the meat industry, during which all of these circumstances were foreseen, particularly since the end of 2019. The proposed measure would support an outdated business model in which vets were imported in the CVO's words "to be our lowest paid colleagues"; there had been a lot of discussion around market forces, and this measure would remove or lessen market forces that could lead to the adoption of a new business model.

There had also been reassurances about things "in the pipeline", none of which had been committed to the paper and the failure to do so was a huge concern; it was important to explore imaginative solutions: things like debt forgiveness for new graduates, contracts with farm practices, and increased remuneration; what might be necessary was nationalisation of the key provider. Temporary Registration was not the right mechanism, the paper said it was an 'anticipated' rather than current shortage, and there appeared to be time to give reassurances to commit to paper the measures that had been outlined at the meeting; pressure should not be removed from market forces that were driving change in this area;

- re: the government's tender process prevented a lot of contributions from practice; when you looked at the requirements to tender for that work, it ruled out most practices, which could release a lot of capacity – 'cheap' and 'value' were not the same thing, and the College could

be seen to be propping up one particular business model by making the change without looking at the contracting process;

- re: IELTS level, it felt it was being set around the immigration visa requirements rather than the requirement of quality service; level 5 was someone likely to make many mistakes and the CVO had spoken about the complexity of some of the situations the OV may find themselves in. Without saying the IELTS level should be pushed up, it should be explicit in the supervision arrangements that this should include language support that was not just about training people to get up to the next level, but for a role on a day-to-day basis of ensuring the quality and accuracy of the work of people with a lower level of English may be undertaking;
 - o IELTS level 5 was suggested bearing in mind the Home office skilled worker visa requirements; level 7 was defined by the profession as the professional level; key, however, was that the vet had to pass the required training: the Bristol course for the meat hygiene OVs was technical, so could not be learnt by rote. The issue re: OVs in abattoirs – where the current pressure was – if it remained unresolved, line speeds would have to slow down, that, in turn, would impact down the line at farms already impacted by Covid.

On the issue being foreseen, it was one of the risks government was aware of; two key unknown issues were: what the agreement on future trading relations with the EU was going to be, which did not happen until December 2020, and mutual recognition of professional qualifications; and, what the Free Trade Agreement (FTA) requirements were going to be in terms of certifications, which had significant impact on resourcing requirements;

- o important points were made around the tendering process and the opportunities in operational transformation programme, specifically about FSA vets carrying out meat controls, all of which were being considered; there would be an engagement process in the next few months. Tenders were awarded in spring 2020 but they were awarded on the proviso the Cabinet Office and Treasury looked at sustainability of the model and that was what the programme would be doing.

10. The President drew the conversation to a close.

11. Council was asked to consider the Defra proposals and to decide if, in principle, it agreed to the Temporary Registration of suitably qualified and supervised non-UK qualified vets to undertake certain specific functions as Official Veterinarians (OVs) as outlined in the proposal:

| | |
|---------------|----|
| For: | 11 |
| Against: | 10 |
| Abstain: | 3 |
| Did not vote: | 0 |

12. Mr Leicester experienced technical difficulties and submitted an email vote.

13. This was agreed by a majority vote.

14. The President apologised for the abrupt break in the meeting and thanked the CVO and Ms Clark for joining Council to discuss the paper.

Ms Clark and Miss Middlemiss left the meeting.

Annex A

Summary of registration requirements

Full registration

The VSA sets out the routes for registration for veterinary surgeons to practice in the UK. These are what you are familiar with, for example, via the UK veterinary schools and the Statutory Examination for Membership and, prior to EU-Exit, also included via The Mutual Recognition of Professional Qualifications Directive (MRPQ) for those graduating from EU veterinary schools. The MRPQ route fell away post-EU-Exit and, as of 1 January 2021, the RCVS has implemented temporary post-Brexit policies on the registration of European-qualified veterinary surgeons as agreed by RCVS Council. European qualifications are now recognised in accordance with the 'interim EAEVE policy', with graduates from veterinary schools with EAEVE accreditation eligible for registration. Such graduates who do not have English as a first language or who did not study in English are required to meet the same English language qualification requirements as other overseas nationals i.e. International English Language Testing System (IELTS) Level 7 or the Occupational English Test (OET) Grade B.

Temporary registration

Temporary registration is intended for use where all avenues for full registration have been explored and, as the title suggests, are for temporary arrangements. Those coming on to the Temporary Register, while 'on the Register' (and therefore entitled to practice) are not MRCVS and cannot designate themselves as such and they cannot certify documents. Their registration is subject to such restrictions as the RCVS in its discretion decides are appropriate, relating to the length of registration (this is ordinarily a maximum of five years) as well as the place(s) and the "circumstances in which the individual may practice in the UK". The "circumstances" of that role and what it involves need to be clearly defined to ensure that any individual does not undertake work for which they are not authorised. The location from which they will work also needs to be defined. Similarly, supervision which should be real not nominal includes a named supervising veterinary surgeon at each location. Temporary registration has historically been used sparingly in specific situations e.g. short visits by veterinary surgeons accompanying animals competing in the UK; and for postgraduate study, but has also been applied in limited 'employment' situations.

FSS scheme criteria

1. At the request of the FSS, the RCVS allows the temporary registration of those who:
 - a. have a contract of employment or have successfully passed recruitment stages with FSS/Scottish Government to work as an OV/TOV providing meat OCs in Scotland;
 - b. have the necessary skilled worked visa including IELTS at level 5 or are in the process of obtaining it;
 - c. hold European Association of Establishments for Veterinary Education (EAEVE) accredited veterinary degrees.

2. These criteria are different to those suggested by the FSA, which is explained by the FSS as follows:

'Most veterinarians joining FSS would start as TOVs [Trainee Official Veterinarians] and undergo the 12-13 weeks training programme (assuming full-time 37 hours contract), as detailed at Annex B. Authorisation as an OV would only be issued by FSS upon successful completion of the programme and satisfactory results on the final assessment. As the TOVs would be enrolled with the [Scottish Qualifications Authority] for the [Official Controls Veterinarian] customised award, and RCVS registration is a requirement for enrolling into the course, FSS is asking RCVS to grant [temporary registration] to TOVs at the start of their training.'

3. Similar to the FSA, temporary registration lasts for 12 months, with a possible extension of six months, during which time the individual would be expected to pass IELTS level 7.

DAERA scheme criteria

1. Overseas veterinarians who are not eligible for full registration with the RCVS may be temporarily registered where those veterinarians:
 - a. Have a contract of employment or have successfully passed recruitment stages with DAERA's contractor. TRNOVs will be provided by an agency under contract with DAERA and will not be direct DAERA employees;
 - b. Have the necessary skilled worked visa including IELTS at level 6 or are in the process of obtaining it; and
 - c. Hold European Association of Establishments for Veterinary Education (EAEVE) accredited veterinary degrees.
2. Temporary registration will be for the purposes of delivering Official Controls in NI FSA approved meat establishments and will be akin to that of a 'novice' OV.
3. Temporary registration would last for 12 months per individual, with the possibility of an extension of six months, during which time the temporary registrant would be expected to pass the IELTS level 7 test.

EXTRACT – June 2023 Council minutes

UNCLASSIFIED

Temporary Registered Novice Official Veterinarian (TRNOV) Scheme

Dr Richards declared an interest in that she was on the Board of Food Standards Scotland, and was a member and on Council of the Association of Government Vets (AGV)

1. The Registrar introduced the paper and reminded Council that it related to a specific request for temporary registration for Official Veterinarians (OVs) providing meat hygiene controls in England and Wales that was first before Council in 2021. The Scheme was originally to be for 12 months' to cover an immediate, acute, veterinary resource need post-EU-exit in that particular sector; the whole Scheme being a departure from what would be normal registration rules for people coming on to the *RCVS Register of Members*. Eligibility for the Scheme required vets to have a contract of employment; a skilled-worker visa; an International English Language Testing System (IELTS) level 5 (or equivalent Occupational English Test (OET)); a degree from a European Association of Establishments for Veterinary Education (EAEVE) accredited veterinary school; and to have passed the OV training scheme. Whilst the Scheme was originally for 12 months, there was flexibility for individuals to be given a little longer – up to 18 months – to achieve IELTS level 7 language requirements that would put them onto the full Register. One of the key features was the supervision aspect of the TRNOV by an MRCVS.
2. In June 2022, the matter had come back to Council, at which point it was agreed to extend the operation of the Scheme for a further 12 months; the minutes of that meeting and the reviews undertaken by Standards Committee were included in the meeting bundle.
3. Upon review, it was noted that one change was to bring people on with IELTS level 6, on the basis that they were more likely to complete their level 7 with the timescale set; as well as a new approach to have Meat Hygiene Inspectors (MHIs) with level 5 that would undergo an intensive language programme.
4. The great need for personnel in place for public health was recognised. However, one of the ongoing concerns was the danger that what was a temporary scheme would become the 'new normal' as it was unique to that particular sector and therefore unavailable to other sectors that might also feel they had shortages. The Food Standards Agency (FSA) had always been clear that the Scheme remained a temporary solution, but that trying to find an exit strategy might take longer than originally envisaged and was now asking for a further extension.
5. Ms Miles, FSA CEO, emphasised how food standards relied on the integrity and professionalism of the members within the profession. Unfortunately, EU-exit and Covid-19 had had an impact on the capacity of OVs that had led to challenges for the FSA to deliver official controls. In order to address the immediate issue the FSA was facing, the request was for a three-year extension to the TRNOV Scheme. It was understandable that some Council members might be disappointed if it was felt that the FSA had not gone fast enough in forming its model, but it had encountered a lot of constraints on a practical, legislative, and economic level that had impacted on progress. Without an extension to the Scheme, within three to six months there would not be enough veterinary resource and approximately 20% of abattoirs would reduce, or cease, operations,

which would directly impact food supply exports; public health; animal health and welfare; as well as the industry.

6. The FSA was committed to the temporary nature of the Scheme. It had worked with its Service Delivery Partner (SDP) who would only recruit vets with IELTS level 6 from July 2023; and there would be improvement to employment conditions, that would hopefully assist with retention. There had also been a plan for direct employment via the Government Veterinary Pathway, and much time had been spent preparing costing and practicalities of such a route, but two things had meant the FSA was unable to proceed with that pathway: the small budget allocated under its current spending settlement; and the practicality and complex nature of recruiting vets from abroad in order to provide a flexible service that could, instead, come from a SDP. Work on that route had therefore been paused and instead the SDP had started to put more emphasis on retention and career pathways that would also feature more in the contract when it came up for renewal. It was unknown if the direct employment pathway would be introduced once there was a new spending settlement from HM Treasury.
7. Dr Clark further emphasised the importance of MHIs in abattoirs and the FSA's statutory obligation to deliver on its standards. Work had been done to show reform and proposals to exit from the Scheme, aided by what had been learnt over the past two years on how temporary registered OV's progressed through the system. A three-year extension would provide stability whilst the MHI direct track approach was established and would allow further development work on medium- to long- term proposals as outlined in the paper. It was noted that 98% of OV's that had become full MsRCVS had had level 6 English language or above; the MHI track route was for those members who had graduated with a degree with EAEVE accreditation and between IELTS levels 5 and 6 English language who, in the past, would have been registered under Mutual Recognition of Professional Qualifications (MRPQ).
8. The details of the bar charts within the FSA proposal were outlined, in particular the model for 50% MHIs directly employed versus 50% supplied by the SDP. The action plan in a wider context was about addressing recruitment and retention of OV's and FSA vets in the short-term, to additionally encourage return to the profession in the medium-term and working closely with Defra and across the profession to address wider cultural challenges around the 'attractiveness' of the veterinary public health and OV roles in the long-term.
9. Mr Johnson provided Council with an update on the service delivery contract. The current SDP contract ran until March 2024; the FSA was in the process of developing a re-tender strategy and plan to maximise potential interest, some bidders had already been in contact before any bidding process had actually commenced. Work was ongoing with the Cabinet Office to understand how best to structure future contracts to increase attractiveness and the FSA was actively looking at opportunities to include service delivery alongside innovation partners following early engagement. Different operating models would be explored whilst recognising policy constraints; the recruitment pipeline and future supplies would ensure a sustainable supply of resources. Key focus would be on the delivery of contracts for any re-tender.
10. With regards impact, without temporary registration the industry would face significant challenges: you would expect c. seven OV's to leave monthly, equalling c. 40 over six months that would

require prioritisation of abattoirs and the subsequent impacts to food supply, export and animal health and welfare relationships within the industry as well as economic sustainability of the supply chain.

11. The CVO added her support to the longer period of extension to provide some stability and certainty to the meat industry and vets within that sector; she welcomed the detailed work done by the FSA, and that moving to IELTS level 6 had helped with retention but had not resolved the issue. However, retention was not just an FSA issue but a profession-wide one.

12. Comments and questions included, but were not limited to:

- thank you for the comprehensive reports. Whilst sympathetic to the challenges and constraints in terms of a permanent solution, at the moment there was insufficient reassurance from the information provided; a three-year extension was not temporary; there was a lack of credibility to the action plan in terms of progressive change to a permanent solution and, in particular, the ability to increase the number of MRCVS'. The College was facing a situation where it *had* to consider an extension, but there was also an overwhelming sense from the papers and comments made that the cost was too much of a driving factor as to why progress had not been made to date; that would get worse, not improve, over the next one or two years, so reassurance was sought as to why that would not be a reason for not progressing at the speed proposed in the papers;
- there were three issues: the temporary register was time-limited, three years was too long and overstretched that aspect; with regards retention, whilst on the Scheme there was a defined purpose for a specific need, if people coming onto the temporary register were not staying in the public health arena was that need ever going to be satisfied? Also, an EAEVE-accredited degree was a key criteria for the Scheme, Council reviewed EAEVE accreditation annually at its January meeting, and the TRNOV issue should be considered in parallel with that decision otherwise there was an inconsistency should the Scheme be extended but EAEVE accreditation not;
- the continued acceptance of accreditation, or people from accredited schools, was inconsistent with the RCVS' current accreditation standards; another issue was the retention of those on the Scheme, there was a huge difference between those leaving within three months to those leaving within five years, it would be useful to have more information about the specifics of retention rates;
- was there a time limit for someone to be on the temporary Register, and what was the difference between pre-EU-exit and post-EU-exit regarding MRPQ as it appeared it was entirely regarding the levels of English language;
 - o the specific rules for the TRNOV Scheme was within 18 months they had to pass IELTS level 7 English language, pre-EU-exit there was no English language requirement;
- paid Extra-Mural Studies (EMS) was a great idea, especially to encourage people into the public health type of work and this was going to be more important for the future;

- this matter had been discussed previously, but the College was pushed into a corner where it had to make a pragmatic decision to allow agriculture, trade, and farming to continue as smoothly as possible, given that its role was to maintain veterinary standards – had there been any explanation to the profession as to why such decisions were being made? Approving the suggested three-year extension at slightly lower English requirements did seem like a strange way of maintaining public health and animal welfare standards. Furthermore, part of the issue was that the FSA was not funded adequately enough; it was not unreasonable that the RCVS, in its role of maintaining public health, working with Standards Committee could highlight this to the Government and urge it to fund the FSA properly in order to address the issue instead of continually ‘fire-fighting’;
- clarification was needed regarding the critical issue of culture change and changing perceptions of veterinary public health work amongst students entering the profession – it sounded like it was being initiated by the FSA when ultimately it was the SDP doing the recruitment, understanding of the responsibilities and accountability for the culture change work and how it was being resourced was required;
- it was important to note that the extension related to graduates from EAEVE-accredited schools / degrees, not non-EAEVE-accredited. Regarding not triggering a contingency plan because of financial constraints, reassurance was required when the re-tendering exercise took place on the emphasis of exiting the Scheme;
- was there a population of individuals who wanted to take up the roles and what were the numbers of individuals that came in on temporary register? Was there a surplus or was it still a struggle to find individuals, even if it was maintained in that way?
- it was a tactical solution that did not address the strategic problem – the strategic problem stated in the paper was that between 2019 and 2021, the UK veterinary profession fell by 26%, how was the FSA proposing to address the strategic problem of ensuring there were more home-grown vets, given that government policy seemed to look at home-grown solutions rather than increasing migration?
- it was a difficult situation and it was unlikely that Council was unable to approve some sort of extension given the figures referred to; the issue was what the ‘check in’ points actually meant – it should be about the granularity of the progress being made and the milestones over the extension period, whether on an annual basis or more frequently. For example, it was [today] that Council as a whole learnt about the FSA decision to end the direct employment route; if Council was to approve any form of extension there had to be more clarity, transparency and openness about the progress being made so there were not annual, or tri-annual, decisions rolling it forward;
- there had been a lot of ‘sitting on hands’ with the Scheme as extensions kept being given, there needed to be a clear end date on when it was going to stop, a three-year extension was not compatible with that. There was a conflation of the shortage of OVVs with the shortage of vets within the UK – the rest of the veterinary profession did not have an issue with attracting

UK graduates, the reason there was an issue in the OV sector was the deliberate strategy by the SDP to recruit EU vets over many years that destroyed the UK culture of having vets go into public health roles; continuing the TRNOV Scheme allowed the SDP to continue with its business model. The update to Council suggested that, out of 500 responders, 70% would be interested in some sort of scheme to allow them to get involved with OV work alongside clinical work, which would improve the diversity of the clinical case load – even if members worked part time, and if training was made freely available to anyone that was interested, there was an opportunity to stop the gap; the TRNOV Scheme was not the only solution to the problem and it was concerning nothing else was being done to look for alternative solutions;

- modelling was referred to in the paper, and it was commented that there were already delivery providers interested in the tender process, was there capacity in the industry that was not currently being accessed? The modelling was delivered by the current SDP, had that been interrogated by anyone else?

13. The FSA and CVO responded:

- FSA confirmed it was not unsighted with regards the annual renewal of EAEVE accreditation and it was working very closely with Defra and the RCVS on the work around direct accreditation, but it had had to make some assumptions, EAEVE accreditation being one of them;
- regarding culture, there was an opportunity, not just in delivering official veterinary controls and abattoirs, but across the whole of veterinary public health to raise its profile and also the exciting possibilities of the differences that could be made working in One Health, however, this was not just something for the FSA but across government and across the profession for the rules and value of those areas of work, as well as its resourcing and financing. As civil servants, they were subject to civil service rules in terms of payments and increases; given the changes and continuing pressures that would likely be seen outwith and within government in terms of a target operating model, and jobs that would come up, it was likely that the finances and vet pay was going to continue to change. Defra would need to be able to respond to that within the flexibility it had within government, which it was working on and why it was developing a cross-government vet services pay frame; however, it took a lot of time as it meant working across departments to make it happen, and there was a cross-profession aspect that also needed to be worked on;
- regarding FSA funding, the way it worked was they received a three-year 'pot' that could not be changed once received. In 2022 there had been an unforeseen level of inflation that triggered pay pressures, and also additional work relating to EU-exit. Negotiations with the Treasury for a different arrangement would presumably fall in 2024, so there was a future opportunity;
- regarding the three-year period, Council had been thoughtful, strategic, and tactical about its comments. What was important were the checkpoints and being held to account for progress, however, if a three-year extension was not granted, the FSA would struggle to attract other companies to the bids because there would not be the certainty of the temporary

arrangement and would feature as a massive risk; it also allowed for greater flexibility where there could be the potential to use slightly different models on the domestic, British trained, veterinary front.

14. Council had a 10-minute break before continuing the discussion on the confidential aspects in closed session. This information is in the classified appendix at paragraphs 1 – 6.
15. Upon returning to open session, Council informed FSA guests of the following motion and decision:

A motion was put to Council to amend the decision before it and reduce the extension of the TRNOV Scheme from the requested three years, down to 18 months' duration, to align with the RCVS review of its decision around acceptance of EAEVE accreditation (with a recommendation that re-tendering for the SDP be completed before the end of that 18-month period):

Proposer: Ms L Ford
Seconder: Dr K A Richards

16. A vote was taken:

| | |
|----------|----|
| For: | 22 |
| Against: | 1 |
| Abstain: | 0 |

17. Experiencing technical difficulties, Dr Connell submitted an email vote, and Drs Gardiner and Richards submitted verbal votes, these were included in the figures. The amendment was approved by a majority vote.
18. FSA guests thanked Council for its time and consideration. It was noted that they would need to come back with a timeline for the re-tender process.

FSA guests left the meeting.

Food Standards Agency (FSA), Food Standards Scotland (FSS) and Department for Agriculture, Environment and Rural Affairs (DAERA) update to the RCVS Council on reducing utilisation of Temporary Registration (TR).

7th November 2024

This is a **joint paper to the RCVS Council from Food Standards Agency (FSA), Food Standards Scotland (FSS) and Department for Agriculture, Environment and Rural Affairs (DAERA).**

The paper will focus on the following:

- Executive Summary
- Progress Since Last Update:
 - Food Standards Agency
 - FSA Data and Forecasting
 - FSA Tender Update
 - Food Standards Scotland
 - Department for Agriculture, Environment and Rural Affairs
- Conclusion
- Annex 1: Glossary
- Annex 2: The Transfer of Undertakings (Protection of Employment) Regulations 2006

Executive Summary

1. Official Veterinarians (OVs) working in abattoirs are vital in protecting Animal Health and Welfare, assuring food safety standards, and underpinning international trade in meat products and, without them, the **£10.9bn domestic meat industry and £2bn meat export industry** would rapidly be unable to operate sustainably. Legislation ([\(EU\) 2017/625](#)) stipulates that for abattoirs to operate, they require the presence of an OV, and therefore we need to ensure we have a reliable means of continuing to recruit (and retain) with contingency plans in place to deal with any unexpected disruption.
2. The FSA and its current SDP has continued to work towards removing reliance on the TR scheme and have **reduced the level of Temporary Registered Novice Official Veterinarians (TRNOVs) working on the FSA contract to 18% (49 TRNOVs) in August 2024 compared to 46% (125 TRNOVs) in July 2022**. We have increased awareness of the OV roles through Extra Mural Studies (EMS) programmes and career events which has helped to contribute to the increase in the number of domestically trained veterinarians considering OV roles.
3. **The FSA has successfully removed reliance on bulk application for TRNOVs and will therefore not require new applications to the current scheme from 31st December 2024.**
4. **The FSA, FSS and DAERA request that RCVS Council supports ongoing access to the RCVS TR scheme by individual application for Veterinarians delivering Meat Official Controls.**
5. The rationale for requesting this is the ongoing uncertainties in veterinary resourcing, evolving government policies, potential impacts of RCVS accreditation reforms on recruitment, and the possibility of new suppliers entering the market to deliver Official Controls after the current contract retender. The table below details the current approved TR applications for each department, including the date approved and the proposed TR schemes, contingent upon RCVS Council's agreement:

| Department | Number of TRs working as OV's (as of 31st August 2024) | Current TR Scheme Approval | Approved From | Proposed Consistent TR Scheme approach if agreed by RCVS Council |
|-------------------------------------------------------------------|--------------------------------------------------------|----------------------------|--------------------|------------------------------------------------------------------|
| Food Standards Agency (FSA) | 49 | Bulk Application | Extended June 2023 | <u>Individual Application</u> |
| Food Standards Scotland (FSS) | 1 | Individual Application | January 2023 | |
| Department for Agriculture, Environment and Rural Affairs (DAERA) | 0 | Bulk Application | February 2024 | |

6. The RCVS TR scheme would only be used if other recruitment channels became insufficient or to fill positions during the transition to a new recruitment pathway, ensuring continuity in service delivery.

Progress Since Last Update:**Food Standards Agency:**

7. The FSA and SDP have significantly reduced their reliance on the current TRNOV scheme and at the same time created a strong recruitment pipeline through the Vet Track pathway. The targeted changes we've made to our recruitment practices have led to increases in more people passing the International English Language Testing System (IELTS) Level 7 exams and improving our retention rates (further details in paragraphs 19 & 20).
8. However, workforce shortages remain challenging for the whole veterinary profession in the UK and worldwide. Home Office changes to immigration policy in April 2024 added further volatility, uncertainty, complexity and significantly increased the cost of providing veterinary services, particularly in Veterinary Public Health (VPH). Critical VPH roles are generally not seen as attractive within the profession in the UK, especially in abattoirs, and over 96% of OV's currently working in abattoirs in England and Wales are from overseas.
9. We are working hard to raise awareness and increase the interest of UK vets in these roles and to change the perception of this branch of the veterinary profession. We have continued to build on the engagement activities with UK vet schools and universities to promote career pathways within Veterinary Public Health. The FSA's Extra Mural Studies (EMS) programme commenced in 2023 for vet students and vets looking for a career change and has received significant interest as well as excellent feedback. We have hosted 24 vets and veterinary students to date and already have 26 applications for the 18 places available in 2025. Our SDP EMS programme focusing on the OV role has also been successful, as have their direct initiatives to promote OV career pathways to UK veterinary undergraduates.
10. Following recent Home Office immigration policy changes, the salaries for OV's working in abattoirs in England and Wales have increased and, working with our current SDP, we continue to focus on improving the working environment and variation within the role.
11. The retention strategies implemented by our current SDP, along with the increased salaries, are already positively impacting retention rates. For example, 3 OV's who had initially resigned have now withdrawn their notices. This improvement is also expected to increase the experience of Official Veterinarians (OV's) working in abattoirs.
12. **The FSA is also working with RCVS officials as they develop future accreditation approaches following the confirmation of RCVS Council's intention to phase out recognition of EAEVE-accredited degrees no later than 2029.** Because EAEVE accreditation is a critical element of the current Vet Track programme, we are working to understand and support RCVS ambitions to directly accredit overseas universities. We also continue to engage with Other Government Departments (OGDs) to explore opportunities that could further support the RCVS's intentions, such as Department for Business and Trade (DBT) grant funding. This work underpins delivering a sustainable pipeline of future OV's and a smooth transition when EAEVE recognition is removed,

including supporting Vet Track candidates, with EAEVE-accredited degrees, to progress through the system and obtain their full MRCVS accreditation

13. The FSA has continued to respond to challenges presented by changes to immigration policies and to increase the political visibility of the veterinary profession, and OV roles in particular, with the new Government. Our goal is to ensure that the evidence presented to the EFRA Committee in March 2024 regarding veterinary shortages, along with the resulting recommendations, remains impactful and does not lose momentum. A good demonstration of this is the positive exposure that was achieved in the recently aired Country File programme¹ where, with others, the FSA highlighted the pivotal role OVs play in food safety and the recruitment challenges currently faced.

FSA Data and Forecasting

14. As of 31st August 2024, **273 OVs have entered the TRNOV scheme for FSA-delivered Official Controls (OC)**. This has continued to enable 100% delivery of OC in abattoirs in England and Wales. This would have been impossible to achieve without the RCVS Council agreeing to an extension of the TR scheme for a period of 18 months in June 2023.
15. The proportion of TRNOVs versus MRCVS OVs has decreased since July 2022 46% (125) to August 2024, when 18% (49) of the OV workforce were TRNOVs.
16. Vet Track is an alternative recruitment pathway to OV qualification, introduced by our current SDP. Vet Track is a pathway for veterinarians who have qualified from an EAEVE accredited university and who hold IELTS Level 5 English to be recruited to carry out Meat Official Controls (within the OV-led team) whilst studying for the IELTS Level 7 language qualifications. On achieving this qualification, they are eligible to become MRCVS and move along the pathway to become a Novice OV (NOV) and then to gain the full OV status.
17. We therefore expect that over the next 6-9 months Vet Track conversion to NOVs will increase, becoming a significant recruitment pathway for OVs from mid-2025 that can replace reliance on the TRNOV scheme (see paragraph 23 for further details).
18. The percentage of the workforce that are TRNOVs will continue to decline, and we expect the last vets recruited through the bulk TRNOV application process in December 2024 to gain IELTS Lv7 English and become MRCVS by no later than June 2026.

¹ Link to Country File Programme: <https://www.bbc.co.uk/programmes/m0023j62>

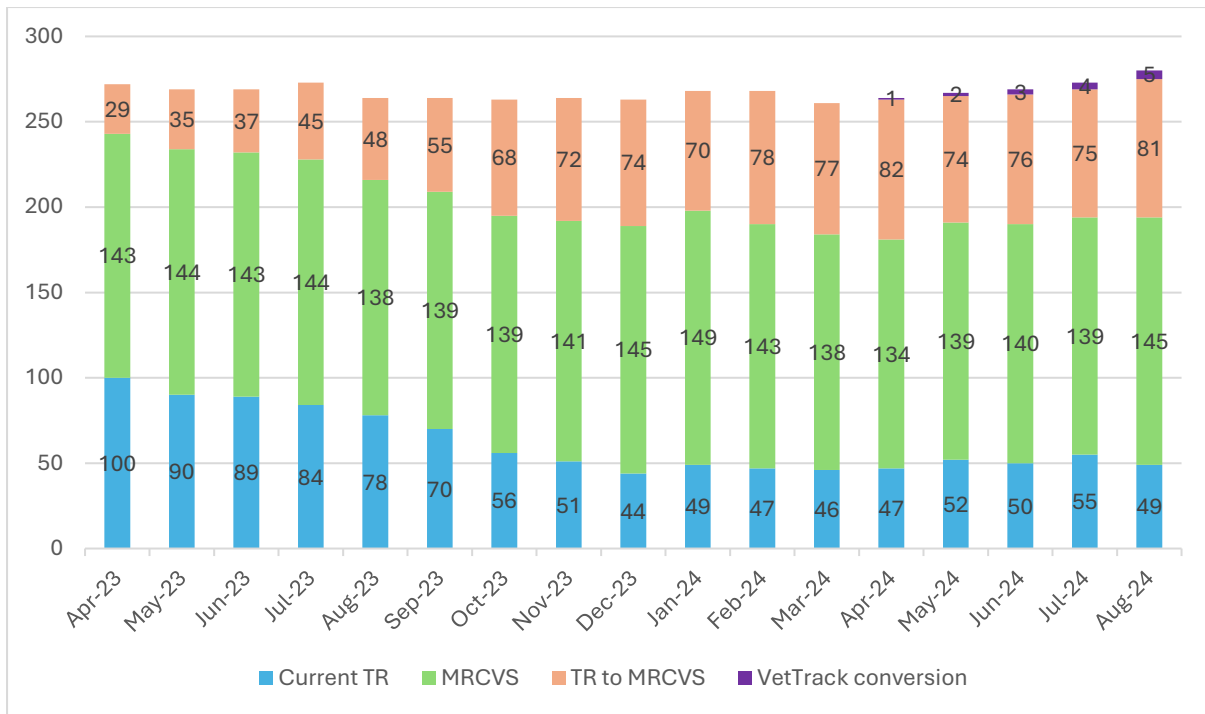


Figure 1: demonstrates the veterinary role and recruitment route split from April 2023 to August 2024. The chart shows the number of TRs that have transitioned into full MRCVS has increased from 29 in April 2023 to 81 in August 2024.

19. Based on early experiences, recruiting at IELTS level 6 and with intensive language tuition, TRs now have a significantly better chance of achieving Level 7 English within 12 (or 18) months, as shown in the table below:

| Period | IELTS Level 7 Pass Rate |
|------------------------|-------------------------|
| January 23 – June 23 | 57% |
| July 23 – December 23 | 72% |
| January 24 – June 24 | 82% |
| July 24 – September 24 | 100% |

20. The FSA’s current SDP is also focusing on retaining OV’s and this is showing early positive impacts. Figure 2 illustrates a shift in attrition reasons from failing IELTS L7 (June-Dec 2023) to new sector roles and internal moves/secondments (since Jan 2024).

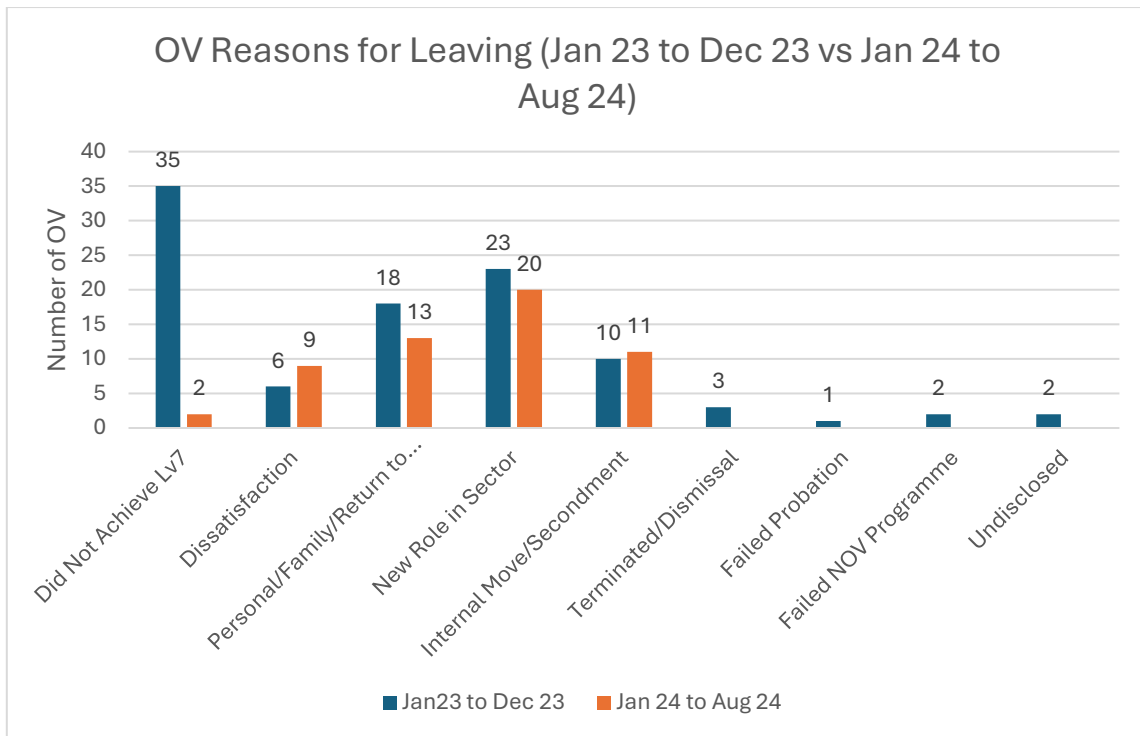
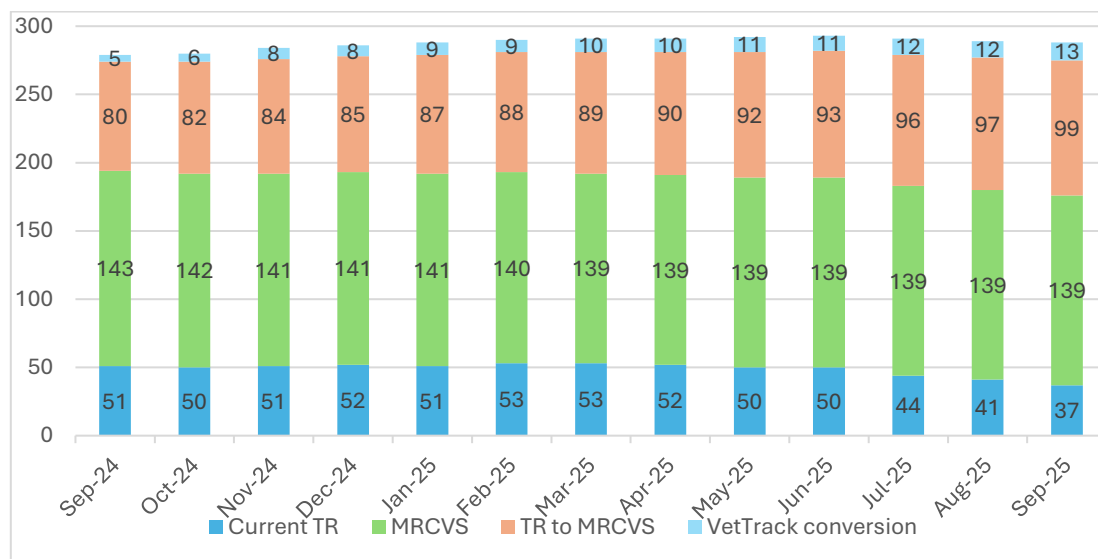
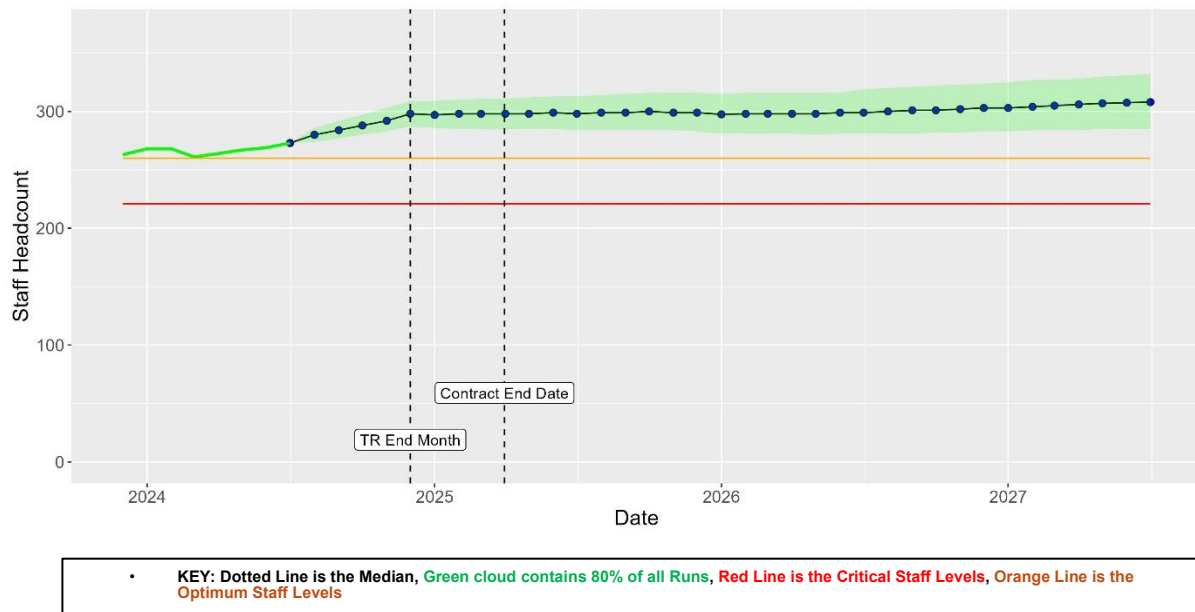


Figure 2: OV reasons for leaving role.

21. The FSA has continued to monitor and assure delivery of Meat Official Controls using critical management information which monitors SDP delivery performance, and the delivery model utilises recruitment, retention, and attrition data to forecast resources.
22. The FSA's current SDP has modelled their OV recruitment pathways up to September 2025. The graph below shows the expected reduction in the number of TRNOVs and an increase over the period in Vet Track conversions to OV status. **This is subject to a potential change from April 2025 depending on the outcome of the FSA Delivery of Official Controls current tender process:**



23. The chart below models the impact of withdrawing the bulk application process for TRNOVs at the end of December 2024, with the continuation of the Vet Track OV recruitment pathway as a replacement. **The forecast shows that, provided there is no impact to the Vet Track recruitment or other constraints on OV recruitment, the FSA will be able to provide service delivery without reliance on the bulk TRNOV application process.**



24. If the Vet Track pathway were to significantly fall below these forecasted expectations, we could expect that OV resource would decline and hit a critical level by 2027. We will therefore continue engagement with the RCVS on any changes to the accreditation approach and to have contingencies in place.

25. **Ongoing access for individual applications to the RCVS TR scheme remains important.** Significant progress made by the FSA and our current SDP, including reducing the number of TRNOVs to just 18% of the workforce and the promising growth of Vet Track as a sustainable recruitment pathway. The FSA anticipates that limited **individual applications through the RCVS TR scheme approach are likely to come from vets progressing through the Vet Track pathway, who already possess extensive experience in the Meat Official Controls environment.**

FSADOC Retender Update

26. The retender for the future contract for delivery of FSA Official Controls (known as FSADOC) is currently underway. The tender launched in April 2024 followed a period of extensive engagement with potential suppliers, stakeholders, and other interested parties to help us understand the best way to structure the tender for the marketplace. The RCVS was represented at our Stakeholder Engagement Day in London.

27. Bids were subject to robust evaluation and a recommendation for contract award is currently with Cabinet Office and HM Treasury for approval. An announcement on contract award is due to be made in late October and will be notified to the RCVS before the Council meeting.
28. The FSA has undertaken significant work to improve market resilience by structuring the tender to attract competitive bids from a wide range of providers. If multiple/new suppliers are successful at tender, employees, including TRNOVs, and Vet Track employees will be protected by the Transfer of Undertakings (Protection of Employment) (TUPE) Regulations 2006 (Annex. 2). The transition period from contract award to contract start date on 31st March 2025 will focus on effective resource capability and deployment to ensure continued service delivery.
29. Recruitment strategies and ensuring a sustainable supply of veterinary resources to deliver the service was a key area evaluated across all bids. This allowed the FSA to gain assurance of stable recruitment strategies to mitigate the risk of service failure, as current challenges recruiting suitably qualified veterinarians will continue to be a high-risk factor. Further information regarding the FSADOC retender is available at [FSA Delivered Official Controls \(FSADOC\) retender | Food Standards Agency](#)

Food Standards Scotland:

30. Since September 2019, FSS has operated a fully employed OV model in Scotland, with most OVs directly employed under Scottish Government terms (a pool of locum contracts remains for remote plants/areas). This has maintained retention rates of 90-95%, with only 1 or 2 resignations per year from a cohort of 25-30 OVs
31. In January 2023 FSS applied to the RCVS for TR of Trainee and full OVs, which was granted. This was only utilised for one employee, which since has achieved the required level 7 IELTS and is currently progressing the paperwork for their full MRCVS.
32. Earlier this year, FSS's recruitment campaign offered OV/TOV roles to six candidates. Two of them, with IELTS levels 6 and 6.5, will need temporary registration, so current arrangements must continue.
33. Over the past 2-3 years, FSS has made significant investments to enhance retention, recruitment and its reputation as a key employer of Civil Servant vets in Scotland:
- £4,000/year pay supplement since September 2021
 - 4-month fully paid; one-on-one mentored training program accredited by the Scottish Qualifications Authority
 - Continuous exploration of OV role enrichment opportunities
 - Contracts for high-quality technical training courses to ensure a minimum of 35 hours CPD for each OV
 - Clear career progression paths, such as the Vet Advisor Deputy role.
34. The significant investment by FSS in internal improvements to aid retention and attract new talent is best evidenced by the very recent award achieved: **Silver** accreditation through the **Great Workplaces** by **BVA** scheme. With 5 of the 18 subsections evaluated rated Gold and all the rest Silver, this is an astonishing achievement, especially considering the size of the workplace (107 staff in scope) and the nature of the work

(dissipated in around 20 locations across Scotland, reliant of third-party stakeholders and with little opportunity for flexible working).

35. FSS remains actively involved in UK working groups dedicated to enhancing public health veterinary services. Since August 2023, FSS has promoted OV/TOV roles through a tailored EMS placement offer and participation in student career fairs.
36. On the international front, FSS has expanded its recruitment efforts with targeted marketing campaigns and presentations, both in-person and remote, to EAEVE-accredited Vet Schools.
37. The continuation of the individual Temporary Registration facility would complement all efforts mentioned above and would continue to be utilised under the agreed terms and on a limited basis.

Department for Agriculture, Environment and Rural Affairs

38. DAERA operates a comprehensive state Veterinary Service and serves as an SDP under a formal Service Level Agreement with the FSA. DAERA, as a Competent Authority, also appoints and authorises official veterinarians for certification.
39. On 14th February 2024, DAERA submitted a detailed proposal to the RCVS Council “**To permit the extension of the facility for TRs for the provision of Official Controls in NI FSA-approved meat establishments**”. The paper highlighted the recruitment and retention challenges for veterinary surgeons.
40. The detailed Annexes in the paper specified the tasks required of OVs and the roles TROVs would fulfil. The College approved the extension of this facility to DAERA, with provisions for additional support via telephone and email, and restrictions on TROVs signing support health attestations (SHAs)
41. Resourcing pressures are locally magnified by the shared land border with Ireland which is experiencing a buoyant economy and where wage structures are aligned to meet higher costs of living and increasingly higher living standards. The unique challenges in NI have been complicated in the past few years by socio-economic and political factors, however the restoration of a devolved administration has alleviated the most acute issue, where public servants had received no pay increase in two years throughout a period of sustained and rapidly increasing inflation. In that time, the local Minister for DAERA had mandated a pause in recruitment for veterinary and ancillary roles, related to the requirements of the then Northern Ireland Protocol. This had a cascading and negative impact on the resource picture throughout public veterinary services.
42. Political attention on Official (Veterinary) Controls has been significant, with targeted industrial actions at ports and abattoirs by trade unionists to pressure for the return of the NI Assembly, which resumed on 3rd February 2024.
43. DAERA has not required the facility of TRs. An undertaking was provided to update the College should the situation change, to report on the detail of progress. Resourcing in NI remains a concern of a high level of uncertainty at the present time, and therefore it is prudent to ask the College for equivalent access to this derogation. While operating in a

slightly different market for the recruitment of staff, DAERA is not divorced from the wider UK veterinary community and impacts in GB have indirect consequences

44. DAERA is implementing a renewal program to address veterinarian retention and recruitment issues. This includes a grading review of job descriptions and roles, with entry-level grades assessed to meet Principal or Grade 7 levels. The Strategic Investment Board is investigating the market value of veterinarians in Northern Ireland Civil Service (NICS). DAERA, like the FSA, recognises the importance of Veterinary Public Health and collaborates with permanent staff and trade unions to promote the OV role.

Conclusion

45. The FSA and its SDP have made significant progress in reducing reliance on the bulk application TR scheme. The introduction of the Vet Track pathway has given the FSA confidence and assurance that we have a robust and sustainable alternative recruitment pathway for OVs to deliver meat Official Controls.
46. **The FSA has successfully removed reliance on bulk application for TRNOVs and will therefore not require new applications to the scheme from 31st December 2024.**
47. **The FSA, FSS and DAERA request that RCVS Council supports ongoing access to the RCVS TR scheme by individual application for Veterinarians delivering Meat Official Controls.**
48. The access to the RCVS's TR scheme by individual application for Veterinarians delivering Meat Official Controls would only be used if other recruitment methods fail or to fill limited positions during the transition to the Vet Track recruitment pathway and following assessment by the FSA or FSS. We would commit to early engagement with RCVS officials to enable timely processing of individual applications.
49. We will continue to work closely with the RCVS and BVA and the Government Veterinary Services network, to push forward with wider initiatives on recruitment and retention of vets, particularly OVs.
50. The FSA continues to work with RCVS officials as they develop future accreditation approaches following the confirmation of RCVS Council's intention to phase out recognition of EAEVE-accredited degrees no later than 2029.

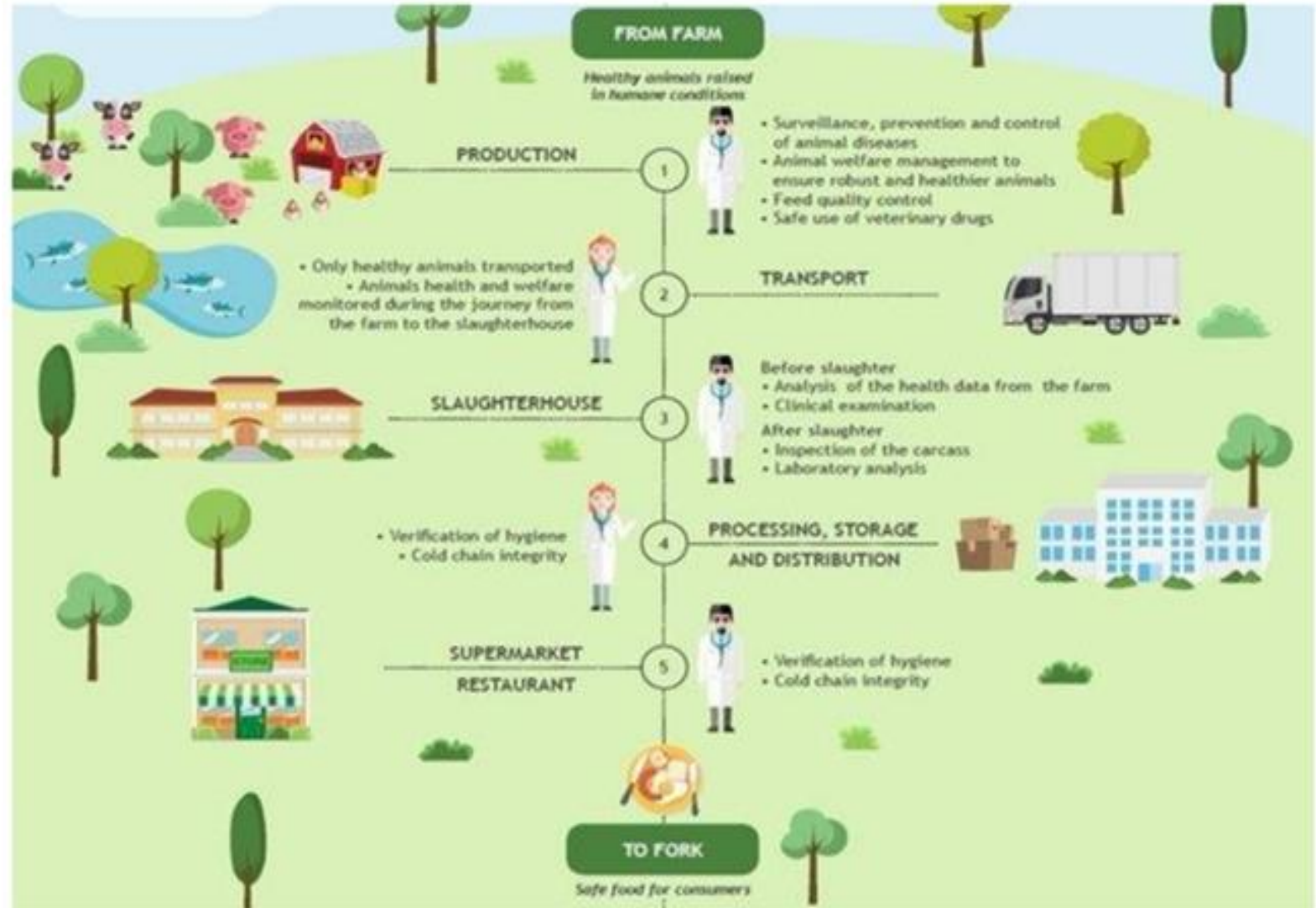
Annex 1: Glossary

| Acronym | Definition |
|----------------|----------------------------------------------------------------------|
| BVA | British Veterinary Association |
| DAERA | Department of Agriculture, Environment and Rural Affairs |
| DBT | Department for Business and Trade |
| EAEVE | European Association of Establishments for Veterinary Education |
| EMS | Extra Mural Studies |
| FSA | Food Standards Agency |
| FSADOC | Food Standards Agency Delivery of Official Controls |
| FSS | Food Standards Scotland |
| IELTS | International English Language Testing System |
| OC | Official Controls |
| OV | Official Veterinarian |
| RCVS | Royal College of Veterinary Surgeons |
| SDP | Service Delivery Partner |
| TR | Temporary Registered |
| TUPE | Transfer of Undertakings (Protection of Employment) Regulations 2006 |
| VPH | Veterinary Public Health |

Annex 2: The Transfer of Undertakings (Protection of Employment) Regulations 2006

51. The Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) in the UK offers employees protection when a business or service provision changes ownership. Under TUPE, the new employer takes over all rights and obligations in relation to the transferring employees, preserving their original employment terms and conditions. This includes continuity of service and protection against unfair dismissal, ensuring employees are treated as if their employment had not changed. Detailed guidance and regulations about TUPE can be found on the UK government's official website at [Business transfers, takeovers and TUPE: Overview - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/business-transfers-takeovers-and-tupe) and the ACAS TUPE advice link: [TUPE transfers | Acas](https://www.acas.org.uk/articles/tupe-transfers)

Veterinary Roles Within the FSA



<https://www.bbc.co.uk/programmes/m0023j62>

Slaughterhouse Roles



- Official Veterinarian (**OV**) and Meat Hygiene Inspector (**MHI**) (Official Auxiliary)
- Field Veterinary Leader (**FVL**)
- Field Veterinary Coordinator (**FVC**)
- Veterinary Delivery Leader (**VDL**)
- Field Operations Export Lead (**FOEL**)
- Veterinary Enforcement Delivery Manager (**VEDM**)

OVs & MHIs



OV's & MHI's: are key to the FSA's delivery of Official Food and Feed Controls and work within the Field Operations Division. They work in slaughterhouses and cutting plants throughout England and Wales to protect animal health & welfare and to ensure meat has been produced safely and hygienically. Most of our OVs (around 260) and approximately half of our MHIs are employed by our Service Delivery Partner

FVLs & FVCs



FVLs: Responsible for approval of establishments and review of existing approvals, providing overall technical leadership across their respective regions and contract management of the service provided by our Service Delivery Partner.

FVCs: Verify service delivery from our Service Delivery Partner and conduct circuit supervisory visits to meat plants to verify overall performance and regulatory compliance. They provide technical leadership to the Animal Welfare (AW) Team and to the Un-Announced Inspection Team.

VDLs & FOELs



VDL's: Part of the Field Management Group Leadership Team working closely with veterinary assurance and vet policy colleagues.

FOEL's: National export overview, coordination of investigation of non-compliances raised by trading partners, liaising with DEFRA and APHA on the delivering of Support Health attestations.

VEDMs



VEDM's: Decision makers of the enforcement action in approved slaughterhouses in England and Wales.

Slaughterhouse Veterinary Roles

Processing, Storage and Distribution



- Audit Veterinary Leader (AVL)
- Veterinary Auditor (VA)
- Export Veterinary Leader (EVL)
- Export Veterinary Auditor (EVA)
- Import Veterinary Lead (IVL)

AVLs



AVLs: Provide technical leadership and management to the teams of Veterinary Auditors.

VAs



VAs: Carry out audits at meat plants in accordance with legislative requirements.

EVLs & EVAs



EVLs: Lead the delivery of export-related matters on behalf of the agency and OGDs (Other Government Departments) for third country (TC) export approvals and audits. They support FSA and Defra policy development and provide specialist advice and training to veterinarians within the FSA and leads the Exports technical portfolio.

EVAs: Carry out third country audits (TCA) in meat plants and cold stores exporting meat and meat products/Other Products Of Animal Origin (OPOAO), assuring trading partners that the UK is fully compliant with their specific requirements.

IVLs



IVLs: Work closely with Defra, Food Standards Scotland (FSS), DAERA and the FSA Market Access Team to develop processes and procedures. They develop in-country audit protocols with emphasis on security and safety in some high-risk countries. The IVL team provides technical expertise into wide ranging workstreams on aquaculture, honey and other animal products, as well as the traditional meat and meat products.

Processing, Storage and Distribution Veterinary Roles

Other Veterinary Roles



- Veterinary Advisers (VAdS)
- Internal Audit
- Technical Portfolios
- Other roles

VAdS



VAdS: support FSA Policy development by providing veterinary advice and expertise to assist with food safety and animal health and welfare matters. They also provide input to the Trade Strategy Team in respect of veterinary matters and certification and negotiations (trade agreements). They are each aligned with technical portfolios to support the development of operational policy and handle queries relating to policy matters.

Internal Audit



This team includes a number of vets who are responsible for assuring FSA management, especially the Accounting Officer, through the Audit and Risk Assurance Committee (ARAC) on the quality of our operations, enabling risk management and improving public service delivery.

Technical Portfolios



The Veterinary Technical Portfolio Group was set up to carry out several tasks all of which aim to meet the FSA's strategic vision. Some of these tasks are to:

- provide high quality professional advice to all involved in undertaking the delivery of Official Controls across the Operations Directorate;
- provide professional advice to Policy teams to support evidence-based policy development;
- provide external liaison and ensure active involvement of Devolved Administrations with Portfolio Group activities; and provide a route for professional career development opportunities for members to develop skills, behaviours and knowledge.

Other Roles



The FSA also have vets deploying their transferrable skills all across the FSA such as in roles in the Science, Evidence and Research Directorate (SERD); Policy; and EU and International Trade.

Other Veterinary Roles within the FSA

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T: 07870 164468
E: Junior.Johnson@food.gov.uk

24 October 2024

To go to: British Veterinary Association, and Royal College of Veterinary Surgeons

FSA Delivered Official Controls (FSADOC) Contracts for England and Wales

I am writing to let you know that the FSA's procurement exercise to provide Official Controls for meat across England and Wales has been completed. Following submission of a full business case to Cabinet Office and Treasury, both have provided approval to award the contracts for all nine geographical Lots.

The strategic aims for the retender of the contracts for the delivery of Official Controls in meat plants were firstly to maintain delivery certainty of the services, secondly to increase market resilience and thirdly to consider contract affordability.

To achieve these aims the FSA split three of the six current contracts (Lots) into two smaller contracts each, which increases the number of contracts available in England and Wales to nine and provides smaller contracts to attract new or returning suppliers to the market to deliver these controls. The FSA also restricted the number of contracts a single supplier could be awarded to seven.

Two suppliers have been successful in the retender: Eville and Jones will be providing Official Controls in Lots 1 to 3, 5 to 7 and 9, whilst a consortium led by Hallmark Meat Hygiene will be providing Official Controls in Lots 4 and 8. Please see Annex 1 – Lotting Structure Map for further detail.

A series of internal and external communications on this announcement is planned from today. This includes internal articles for staff, a post on the FSA's website, notification to all slaughterhouse operators and meat trade associations, the trade union and FSA colleagues in Wales and Northern Ireland. Following this we will observe a ten-day standstill period, pausing further communication, before entering into any contract with the successful tenderers, in accordance with the requirements of the Public Contracts Regulations 2015.

The new contracts are due to commence on 31 March 2025 for a 5-year period and the FSA's priority is to ensure that our high levels of service are maintained during the upcoming transition period.

Yours sincerely



Junior Johnson
FSA Director of Operations










Annex 1 – Lotting Structure Map

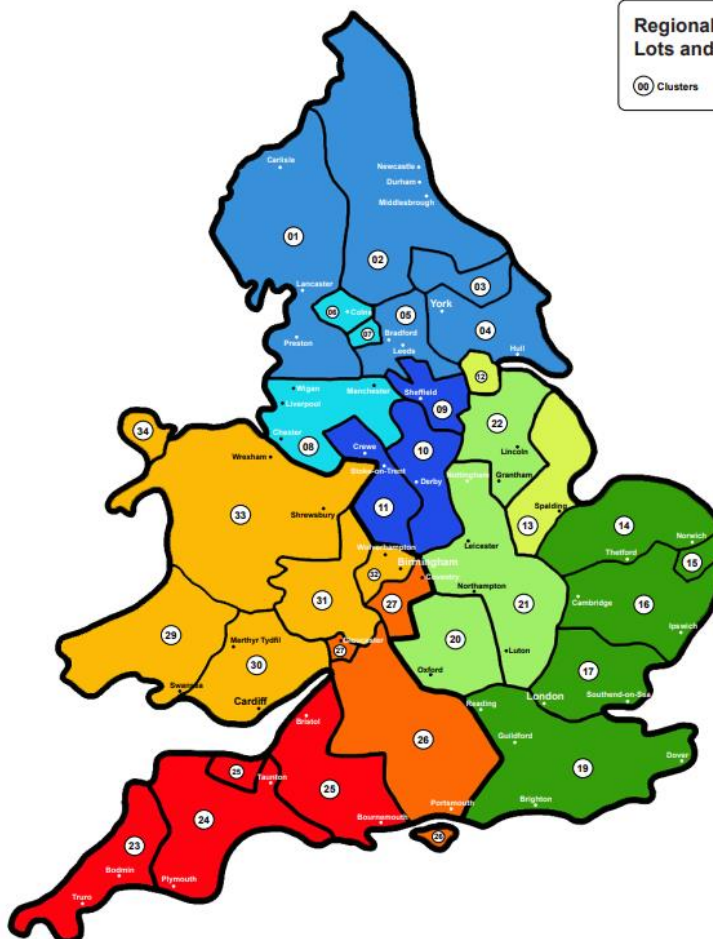


Regional Map with Lots and Clusters

00 Clusters

Map Key:

-  Lot 1 North 1 & 3
-  Lot 2 North 2
-  Lot 3 North 4
-  Lot 4 East 1
-  Lot 5 East 2
-  Lot 6 East 3 & 4
-  Lot 7 Wales & West 1 & 2
-  Lot 8 Wales & West 3
-  Lot 9 Wales & West 4



Annex 1: Map showing the nine geographical areas or 'Lots' for Official Controls for meat across England and Wales. Lot 1 (North 1 & 3), Lot 2 (North 2), Lot 3 (North 4), Lot 4 (East 1), Lot 5 (East 2), Lot 6 (East 3 & 4), Lot 7 (Wales and West 1 & 2), Lot 8 (Wales & West 3) and Lot 9 (Wales & West 4).

| Summary | |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Meeting | RCVS Council |
| Date | 7 November 2024 |
| Title | RCVS Council & Veterinary Nurses Council governance reform consultation - report |
| Summary | This paper summarises the results of the consultation of RCVS governance reform. It outlines decisions for Council on the final recommendations for reform. |
| Decisions required | Council are asked to confirm whether the preliminary reform recommendations should become formal RCVS policy. A number of related decisions are listed at the end of the paper. |
| Attachments | Annex A – Consultation report & annex by Adelphian Ltd. |
| Author | Ben Myring Policy & Public Affairs Manager b.myring@rcvs.org.uk |

| Classifications | | |
|------------------------|-----------------------------------|-------------------------------|
| Document | Classification¹ | Rationales² |
| Paper | Unclassified | n/a |
| Annex A | Unclassified | n/a |

RCVS and Veterinary Nurses Council governance reform – consultation

Introduction

- 1) In January 2024, RCVS Council agreed on a number of principles of governance reform, and two specific models of RCVS Council governance, and agreed that these should go out to consultation before returning to Council for a final decision. RCVS Council governance reform will require changes to or a replacement of the Veterinary Surgeons Act 1966. Any detailed recommendations on governance reform will form part of the College's package of legislative reform recommendations for government. Ultimately, the details of future governance reform will be in the hands of government and parliament, and may differ from the College's preferred option.
- 2) In February 2024, Veterinary Nurses Council (VNC) also agreed on a model of governance reform, and agreed that it should go out to consultation alongside the RCVS Council recommendations. VNC governance composition is a matter for RCVS Council, rather than requiring new legislation, and therefore any final recommendations could be implemented without the need for a new Act.
- 3) The consultation was held between 10 June and 22 July 2024, supported by an extensive communications campaign. The results were analysed by the independent researcher agency Adelphian Ltd on behalf of the College. The results of the consultation can be found in Annex A.
- 4) This paper briefly summarises the consultation report, and then sets out a number of decisions for Council.

Consultation results

- 5) The RCVS received 734 responses to the consultation. This included 28 submissions from organisations such as representative bodies and employers.

| Respondent type | Number | Percentage |
|----------------------------------------|------------|------------|
| Veterinary surgeon | 484 | 66 |
| Veterinary nurse | 57 | 8 |
| Member of the public | 84 | 11 |
| Other professional or paraprofessional | 61 | 8 |
| Organisation | 28 | 4 |
| Other | 20 | 3 |
| Total | 734 | 100 |

- 6) An absolute or relative majority (i.e. more in favour than against) of respondents broadly supported the overall rationale for reform, and all of the individual recommendations for reform. This was also true for each category of respondents (i.e. veterinary surgeons, nurses, members of the public, organisations, etc), with one exception.
- 7) On the proposal to switch to a fully-appointed system, there was high support for the proposal among veterinary nurses, members of the public and other professionals/paraprofessionals. Views among veterinary surgeons were more evenly distributed, with slightly more opposing than supporting the proposal. Among organisations, a majority was broadly in agreement that the RCVS Council should be fully appointed.
- 8) The support for an appointed system by all other groups, and key representative bodies including the British Veterinary Association (BVA), adds further weight to case for change. However, the concerns of the veterinary profession may strengthen the argument that elections might be retained *elsewhere* in the College's governance structure, distant from any core regulatory functions, and linked to 'upstream regulation' activities underpinned by the College's Royal Charter; this possibility, which would not require legislative change, is explored in par 14-16 below.
- 9) A number of queries, arguments and alternative proposals were raised by respondents, many of which apply to both RCVS and VN Council, and a number of these are addressed below. Council will need to determine whether any of these should lead to amendments to the recommendations, or whether they should lead to further consideration or communications, etc.
- 10) Further, while significantly more people supported moving towards lay parity than opposed it, one question that remains unanswered is whether Council should adopt full lay parity (i.e. 12 professional and 12 lay members) or retain a small majority of professionals (13 professional and 11 lay members). Full lay parity would be closer to best practice, would confirm the College's intent to act in the public interest (as noted by the BVA), and is likely to be more acceptable to government. On the other hand, a slightly larger number of professional members could be an acknowledgment of the unique 'Royal College that regulates' model, provide a slightly larger pool of members to populate College committees, and allow greater flexibility in adding new allied professional members.

Queries, arguments, and alternative suggestions

- 11) **Comparisons with other Royal Colleges.** A number of respondents noted that some other Royal Colleges make use of electoral systems. However, these other Royal Colleges are not regulatory bodies, but fill a range of non-regulatory functions - some which are, in the veterinary sector, carried out by RCVS Knowledge, an independent charity with its own system of governance. Other Royal Colleges do not therefore need to be held to the same standards in terms of public assurance, or follow the principles of regulatory governance for health and social care set out by the Law Commission and accepted by Government. Further, not all Royal Colleges have elected boards.

12) **Importance of ‘Royal College role/functions’ justifying differences from the regulatory norm.** A related argument suggests that the RCVS has a ‘Royal College role’ or ‘Royal College functions’ that justify a non-standard system of governance. Here it should be recalled that the RCVS is principally a regulator, *working in the public interest*, as is made clear in both the provisions of the VSA and the objective set out in the Royal Charter – to “set, uphold, and advance veterinary standards”. The Royal Charter also empowers the College to “promote, encourage and advance the study and practice of the art and science of veterinary surgery and medicine, in the interests of the health and welfare of animals and in the wider public interest.” Together, these objectives make the RCVS a Royal College *that regulates*.

13) In the absence of provisions in the VSA, it is under the Royal Charter powers that the RCVS carries out the core regulatory functions for veterinary nurses, and the voluntary regulation of practices under the Practice Standards Scheme. It is also the Royal Charter that underpins ‘upstream regulation’ work such as the Mind Matters Initiative¹ and the RCVS Academy. Even the RCVS Fellowship – an unusual institution for a regulator – principally advises the RCVS on regulatory questions, such as the appropriate rules for alternative and complementary medicine. Only the RCVS’s honours and award-giving powers could be said to be entirely non-regulatory in nature. Being a Royal College that regulates therefore allows a more flexible and holistic approach to regulation than is available to other regulators, but this is not a strong argument for radical differences in governance. It could, though, be an argument for more minor variation from arrangements seen elsewhere (see discussion on the proposed size of RCVS Council, pars 21-22 below).

14) **Separation of Royal College functions and/or separating the regulator from the Royal College.**

A number of submissions argue for the regulatory and ‘Royal College’ functions to be split between different organisations. RCVS Council has already considered this argument in the past, and rejected it for a number of reasons, including:

- a) As per par 13 above, there is for the most part no clear division between regulatory and Charter functions, rather they are part of a holistic whole. Given the regulatory nature of most ‘Royal Charter’ work, a separate Royal College would arguably be left with little to do without a substantial reinvention, and an independent regulator modelled on those in other professions would likely not have the flexibility to be a supportive upstream regulator in the way that the RCVS can at present.
- b) A separate Royal College would be unlikely to have mandatory membership, and in a small profession would be likely to struggle to fund a significant range of activities. Note that RCVS Knowledge, the independent charity that carries out some evidence-provision role found in some other Royal Colleges, is currently largely funded by the RCVS from its income as a Royal College that regulates with mandatory membership.

¹ Note that the Mind Matters Initiative was originally considered a ‘Charter activity’, but mental health schemes are now common among regulators, some of whom cite the RCVS as an influence. This is an example of how the holistic Royal College that Regulates model can actually be innovative and ‘cutting edge’.

- 15) Other submissions, including that of the BVA, have called for a separate 'Royal Charter Council' *within* the RCVS, which would oversee "Royal College functions". A significant risk here is that having two governing bodies could lead to clashes and administrative challenges, and presage a future formal division between a Royal College and an independent regulator. Just as significantly, this proposal faces the difficulty outlined above that it is not easy to separate out 'Royal College functions' from 'regulatory functions'.
- 16) However, a clearer division could be made between 'core regulation' functions (keeping the Registers, education standards, professional standards, and disciplinary processes) and 'upstream regulation' (work that is more focused on *a profession fit for purpose* than *an individual fit for practice*, and that are party or entirely rooted in the Royal Charter). The latter functions are currently overseen by the College's Advancement of the Professions Committee, and it is here where an argument could be made for either retaining an elected element on the Committee membership, or adding delegates from the representative organisations. This would acknowledge the unique status of the RCVS without risking administrative divisions, and allow reform to bring RCVS Council closer to the regulatory norm. Such a change to committee composition is and would likely continue to be a matter for the College that did not require legislative reform, and thus could be trialled. It is recommended that Council consider developing proposals along these lines to sit separately from but alongside its proposals for legislative reform.
- 17) **Creation of a 'super-regulator' sitting above independent regulators for each profession/equality of regulated professions.** A number of responses suggested that rather than the RCVS becoming the 'umbrella regulator' for the animal care sector, that there should be a 'super regulator' that sits above the RCVS and a series of other regulators for the allied professions, perhaps including one for veterinary nurses. Related to this is an argument that in governance terms all professions should be viewed as equal, rather than veterinary surgeons retaining a larger role.
- 18) It is unlikely that legislation would establish a series of new, independent statutory regulators. Such regulators would also not benefit from the 'Royal College that regulates' model. A 'super regulator' model would also lose the significant cost-savings associated with the umbrella model, which has all regulation happening under one roof with many costs being shared, from procurement to staffing. It would also lose the enormous benefits of regulatory coherence and public assurance that would come from having a single regulator responsible for professional standards. Further, as with the current Veterinary Nurse Council (VNC), allied professional councils would be expected to have the maximum appropriate level of autonomy possible without detracting from overall regulatory coherence; it should be remembered that in practice RCVS Council has never overridden a decision made by VNC.
- 19) Some submissions argue that, within the umbrella model, veterinary surgeons should have their own council parallel with those of the allied professions, with the overarching governing Council having a membership drawn in equal numbers from each profession. There may be advantages to this in terms of the optics for the allied professions. However:

- a) A separate council for veterinary surgeons would arguably introduce an unnecessary level of bureaucracy.
- b) Veterinary surgeons will retain a monopoly on diagnosis and major acts of veterinary surgery. They are also the only profession with 'omni-potential', and with a broad role that covers all aspects of the veterinary sector. It is also veterinary surgeons who take on the greater risks, and who will often be in a supervisory role and/or delegating to the allied professions. As with dental surgeons relative to their allied professions there is therefore a strong argument for veterinary surgeons retaining a larger role in governance.
- c) Flexibility for future reform?

20) **Concerns that allied professional representation on Council would not remedy the 'subordination' of allied professionals to vets.** Concerns have been raised, particularly within some parts of the musculoskeletal sector, that changes to College governance would not empower allied professionals to do more, or be less reliant on veterinary surgeons. It is true that the *governance* reform proposals are not designed to do this. However, the College's legislative reform proposals do include greater flexibility over delegation, and the potential to empower allied professionals to play a stronger role in the context of much greater assurance brought about by statutory regulation. While there may always be some differences in the extent of autonomy of professionals in the animal care sphere compared to human healthcare, legislative reform will bring the potential for more extensive and better integrated use of the veterinary team.

21) **Reduction of the size of Council.** A number of submissions, including those from BVA and the British Veterinary Nursing Association (BVNA), recommended that RCVS Council be reduced in size from 24 to the regulatory norm of 10-12. For BVA this was linked to a proposal to create a separate 'Royal College Council', while BVNA and the Animal Health Professions Register (AHPR) argued that RCVS Council and VNC should be of equal size.

22) Reduction in the overall size of Council would indeed bring it closer to the regulatory norm, however, it would create a number of issues, including:

- a) Reducing the link between RCVS Council and its committees. One factor in the recommendation that the College should retain a larger Council is that it would allow a larger proportion of committee members to be drawn from the Council membership, rather than having to be co-opted or otherwise appointed. This link was seen as especially important in a Royal College that regulates model. A reduction to 12 members would add weight to the call for a separate 'veterinary surgeons Council' beneath a more 'board-like' RCVS Council.
- b) Reducing the flexibility to include allied professional members of Council. For example, in a Council of 12 with full lay parity, there would only be six professional members. If a clear majority of these were to be veterinary surgeons, there would only be room for two allied professional members. It would therefore be impossible to account for the growth in the

number of allied professionals without accepting that not all allied professionals would have members of Council at any one time.

- 23) **Introducing a veterinary ‘ombudsman’ or independent complaints system.** A number of respondents suggested that there should be some form of oversight of the RCVS that is more robust than at present. Some of these were focused on a perceived need for an independent complaints process (though not all such submissions suggested an awareness of the existing safeguards in place for the disciplinary process, such as having no Council Members on the Disciplinary Committee, or the ability to appeal to the Privy Council or, in future, the High Court).
- 24) Council may wish to consider whether there is any objection in principle to the concept of independent oversight of the RCVS. Such a system may be beneficial for public assurance. The difficulties of independent oversight are more practical in nature, due to no such body currently existing or having a remit to cover the RCVS. A number of possibilities could be explored:
- a) The Professional Standards Authority (PSA) could formally oversee the RCVS. This might require legislative change to the PSA’s underpinning legislation in order to expand their remit.
 - b) Options could be explored in which the PSA could review the RCVS’s effectiveness on a more informal basis, such as an internal audit assessed by the PSA.
 - c) A new body could be created to oversee the RCVS.
- 25) All of these options would have a cost, which would ultimately be passed to the consumer. It is not clear that any independent oversight would impact any legislation to replace the VSA. Council may wish this question to be explored in more detail.
- 26) **Details of how an appointment system would work, and the governance role of Council Members.** A number of submissions called for more detail to be published concerning how an independent appointment system would work in practice. This would be straightforward to do, by detailing how the existing appointment of lay members of Council works, and by comparing this to similar processes in other regulatory bodies.
- 27) Attention should be drawn to the Professional Standards Authority’s publication ‘*Good practice in making council appointments (2022)*’²; these standards are already followed for the appointment of RCVS and VN Council lay members, and appointed veterinary nurses. The PSA formally advises the Privy Council on the quality of the appointment process for eight statutory regulators. Whether it could also do so formally for the RCVS could be explored as per par 25 above.
- 28) The PSA standards call for appointments to be made using the ‘four principles’ of 1) merit, 2) fairness, 3) transparency and openness, 4) inspiring competence. They further emphasise the importance that all council members and chairs follow the seven principles of public life: selflessness, honesty,

² https://www.professionalstandards.org.uk/docs/default-source/appointments/good-practice-in-making-council-appointments.pdf?sfvrsn=90b57020_22

integrity, objectivity, accountability, openness, honesty, and leadership. The PSA note that while the Privy Council may have a role in approving Council membership, it is for the regulator to establish a proper process for selection of members, as well as for suspending or removing them if necessary. The PSA guidance has specific provisions on open competition, reappointment, and appointment extensions, as well as suspension and removal.

- 29) The PSA guidance calls for appointment processes to have four phases, and provides advice on each phase:
- a) Phase 1: Planning
 - b) Phase 2: Advance Notice scrutiny
 - c) Phase 3: Implementation
 - d) Phase 4: Recommendation, scrutiny, and appointment.
- 30) The PSA guidance includes detailed information on the composition of selection panels and the procedures that they should follow. This includes rules such as anonymous candidate applications, no registrant majority, having at least one panel member with no connection to healthcare provision, and at least one member with no link to the regulator. The guidance also advises against government involvement in the process – this is one way in which self-regulation is preserved. Any existing council member on the panel should be someone at the end of their term and not eligible for reappointment.
- 31) The PSA guidance also has useful provisions concerning advertising and publicity, equality and diversity requirements, avoiding unconscious bias, conflicts of interest, due diligence, and complaints processes.
- 32) **Call for a mix of appointed and elected Council Members.** Some respondents suggested that reform should be more gradual, with a mix of elected and appointed members (as is already the case for VNC). However, this would not address the core arguments against retention of elections set out in Council's rationale for reform. It is recommended that the retention of elections should instead be considered for the Advancement of the Professions Committee (see par 16 above).
- 33) **Doubts about expertise of lay people and allied professionals to judge veterinary matters.** Some respondents expressed concern about the ability of lay people and allied professionals to pass judgement on veterinary matters. There is an opportunity to stress the core *governance* role of Council, i.e. principally the oversight of the decision-making process, and approval of decisions made in committees. The preliminary recommendations assume the retention of a model in which a significant proportion of most committee members are drawn from RCVS Council, and there are provisions to co-opt additional expertise into committees where necessary. However, there may be an argument for a holistic review of committee member selection to follow any reform of RCVS governance.

34) Concerns about the impact on veterinary nurses of regulating additional allied professionals.

A number of respondents expressed concern that statutory regulation for allied professionals would undermine the professional status of veterinary nurses. The College can give assurances here; the status of veterinary nurses as allied professionals has not undermined the professional status of veterinary surgeons. Comparison can also be made with the General Dental Council, which regulates dental technicians and dental hygienists alongside dental surgeons. Some concerns were raised that in a scenario in which many different allied professions were regulated by the RCVS then there may be an insufficient number of allied professional members of Council for veterinary nurses to be guaranteed a VN Council Member at all times. However, that scenario is likely a distant prospect at most, and assurances could be given that it is anticipated that there would always be a VN on RCVS Council for the foreseeable future.

35) Introduction of new councils for each allied profession, to sit alongside VNC. There was widespread support for autonomous councils for each allied profession to sit alongside veterinary nurse Council. Council may wish to confirm that this is the intention, as opposed to the creation of an overarching 'allied professions council'.

36) Royal College functions should not be extended to newly-regulated allied professionals. The British Veterinary Association argued that 'Royal College functions' should not be extended to new allied professionals. It looking at this suggestion it is worth considering the following:

- a) Following consultation, the revised RCVS Royal Charter of 2015 created the status of 'Associates' of the College, and this was explicitly done both for veterinary nurses and for potential future Associates. It is anticipated that future allied professionals, with statutory regulation by the College, would also be Associates of the College.
- b) As discussed above, it is difficult to separate out 'Royal College functions'; most of the College's work is regulatory in nature. The RCVS honours and awards are non-regulatory, but it may be difficult to see the benefits of excluding new allied professions from the Awards, and the optics of doing so may be counterproductive. Membership of the RCVS Fellowship is currently only available to veterinary surgeons, and this is determined by the Royal Charter. However, it has been argued that, should the Charter ever be revised, consideration could be given to allowing veterinary nurses (as allied professionals and Associates of the College) to become Fellows.
- c) As outlined above, upstream regulatory functions such as the Mind Matters Initiative, the RCVS Academy, support for RCVS Knowledge, and the College's environment and sustainability work are partly or fully rooted in the College's Royal Charter powers. It is difficult to see how excluding future allied professionals from these activities would benefit animal health and welfare or public assurance; indeed the contrary is likely to be true.
- d) Excluding new allied professionals from the benefits of the Royal College that regulates model could make them feel like 'second class citizens' and undermine the appeal of the umbrella regulator model which has thus far gained widespread sectoral support.

- 37) **Specific requirements for the presidency and/or chair.** Some submissions argued that the Chair of RCVS Council should not be a lay member. However, this would restrict the pool from which the Chair could be selected, particularly given that lay members may have more experience in this area. As a precedent it is worth noting that the General Dental Council (whose model is closest to the one being proposed for the RCVS, including lay parity and allied professional members of Council) currently has a lay chair. Other regulators, including the General Medical Council and Nursing and Midwifery Council, also have lay chairs. Council may wish to express a view on whether the Chair should continue to be elected from within Council.
- 38) Other submissions argued that the President should be directly elected by the veterinary profession. However, as well as having the other problems associated with election that Council has examined, election of a President standing on a specific mandate could create a risk of public disputes between the presidency and Council.
- 39) **Maximum term lengths for the Chair.** Some respondents suggested that there should be a formal term limit for the position of chair of Council. While this does not appear to be a standard feature of other regulators, it may something that Council wishes to adopt, especially if the intention is to continue to elect the Chair from within Council.

Decisions

- 40) Council Members are asked to vote on whether they support the formal adoption of the following recommendations:
- a) A fully appointed RCVS Council
 - b) Towards lay parity for RCVS Council
 - c) Full parity (vote yes) or small professional majority (vote no)
 - d) Removal of VSC appointees from RCVS Council
 - e) Flexibility to include Allied Professionals
 - f) Separating the Chair from the Presidency
 - g) Fully appointed VNC
 - h) Reducing the size of VNC
 - i) Lay parity for VNC
- 41) In addition, Council may also wish to vote on the following:
- a) Whether the College should develop proposals for retaining an elected component on the Advancement of the Professions Committee.
 - b) Whether to retain a Council of 24 members.
 - c) Whether the College should investigate introducing a separate governing body/Council for veterinary surgeons, to sit alongside those of the allied professions and below the governing RCVS Council.

- d) Whether there should be separate Councils for each allied profession
- e) Whether the College should investigate options for independent oversight of the College.
- f) Whether there should be term limits for the Chair of Council.

Adelphian
Regulatory
Consulting

Report on the Royal College of Veterinary Surgeons (RCVS) Consultation on Governance Reform

Independent analysis carried out by Adelphian Regulatory Consulting
on behalf of the Royal College of Veterinary Surgeons

17 October 2024

Introduction

Background

1. Through June and July 2024, the Royal College of Veterinary Surgeons (RCVS) carried out a public consultation on proposals to reform its governance structure. Proposals were set out in “Ensuring Good Governance: a consultation on RCVS governance reform” and published on the RCVS website.¹ This report contains the findings from analysis of the 734 responses received to that consultation.
2. The consultation invited comments on the rationale for governance reform and specific proposals for the reform of RCVS Council and Veterinary Nurses Council (VNC). In short, the specific proposals were: introducing an appointment system for selection of all members of RCVS Council and the VNC; increasing the representation of lay members on both Councils; removing Veterinary School Council appointees on RCVS Council; creating the flexibility to increase the representation of allied professionals on RCVS Council; separating the role of RCVS Chair from the role of RCVS President; and reducing the size of the VNC.
3. The consultation was approved by RCVS Council following its March 2024 meeting. It followed on from the package of recommendations for reform of the Veterinary Surgeons Act (VSA) 1966 agreed by RCVS Council in 2021, following a public consultation during 2020/2021, as set out in the Legislative Reform Consultation Report.²

Consultation process

4. The present governance reform consultation was open for six weeks, from 10 June to 22 July 2024.
5. The proposals were launched at the BVA Live conference on 7 June, three days prior to the consultation formally opening, and were publicised to seek a wide range of responses. Communications were targeted towards key audiences including individual veterinary surgeons and veterinary nurses; veterinary surgeon and veterinary nurse associations; students; veterinary and veterinary nursing schools; and other stakeholder organisations, including those representing allied professionals. The consultation was made available to the general public via social media and the RCVS website. Briefings were given to the specialist press and a webinar was hosted on 11 June 2024 to further explain the proposals.
6. Responses were collected using an online platform (Survey Monkey). A small number of responses were also accepted by email. Adelphian Regulatory Consulting was appointed to carry out an independent, qualitative assessment of responses to the consultation.

¹ <https://www.rcvs.org.uk/news-and-views/publications/ensuring-good-governance-a-consultation-on-rcvs-governance/>

² <https://www.rcvs.org.uk/news-and-views/publications/legislative-review-consultation-report-2021/>

7. Qualitative analysis was conducted on all responses to the consultation. Each response was carefully reviewed, and key themes have been identified and summarised in the following section of this report. Responses were reviewed in relation to levels of support and arguments supporting and opposing the proposals. Differences between respondent groups were noted where relevant, for example, in relation to levels of support and differences in themes within responses. Queries, requests for further information and suggestions of alternatives or modifications were also noted. These are outlined in the report, with more detailed queries, evidence and suggestions summarised in the annex.

Summary of responses

8. A total of 734 valid responses were received. Responses were rejected as invalid if they did not include comments against any of the nine questions. Partial responses were accepted as valid.
9. The breakdown of responses by respondent type is shown below. Two thirds of the responses were from veterinary surgeons, with the next largest group being members of the public, followed by other professionals/paraprofessionals, veterinary nurses, organisations and other respondents. The “other” category included retired veterinary professionals, student vets and a number of other animal-related professionals.

Table 1: Breakdown of responses by respondent type

| Respondent Type | Number | Percentage |
|----------------------------------------|---------------|-------------------|
| Veterinary Surgeon | 484 | 66 |
| Veterinary Nurse | 57 | 8 |
| Member of the public | 84 | 11 |
| Other professional or paraprofessional | 61 | 8 |
| Organisation | 28 | 4 |
| Other | 20 | 3 |
| TOTAL | 734 | 100 |

10. There were 28 responses received on behalf of organisations. Responding organisations are listed below, where organisation names were provided:
- A.P. Vet
 - Animal Health Professions’ Register (AHPR)
 - Association of Chartered Physiotherapists in Animal Therapy (ACPAT)
 - Association of Pet Behaviour Counsellors (APBC)
 - Blue Cross
 - Bridging The Gap Rescue
 - British Equine Veterinary Association (BEVA)
 - British Veterinary Association (BVA)
 - British Veterinary Nursing Association (BVNA)

- Cattle Hoofcare Standards Board
- Coleg Gwent
- Equine Sports Massage Association (ESMA)
- Greyhound Rescue and Co-ordinated Emergencies
- Institute of Osteopathy (Animal Osteopathy Special Interest Group)
- IVC Evidensia
- Lincolnshire Veterinary Referrals
- McTimoney Animal Association/McTimoney College of Chiropractic
- North of Ireland Veterinary Association (NIVA)
- One Voice for Animals UK
- PDSA
- Pets at Home
- Progressive Veterinary Association (PVA)
- Register of Animal Musculoskeletal Practitioners (RAMP)
- Scottish Borders Animal Rescue
- Synergy Farm Health
- The Pet Practice Ltd
- Tuk's Law

11. The table below shows the number of responses for each question. There were significantly more responses to the first six questions relating to the rationale for governance reform and RCVS Council. Response rates were lower for questions relating to VNC.

Table 2: Responses by question (excluding NIL responses)

| Question | Number of Responses |
|------------------------------------------------|----------------------------|
| 1. Rationale for governance reform | 533 |
| 2. Fully appointed RCVS Council | 554 |
| 3. Towards lay parity for RCVS | 603 |
| 4. Removal of VSC appointees | 463 |
| 5. Flexibility to include Allied Professionals | 563 |
| 6. Separating the Chair from the Presidency | 468 |
| 7. Fully appointed VNC | 342 |
| 8. Reducing the size of VNC | 287 |
| 9. Lay parity for VNC | 392 |

Results of Analysis

Question 1: Rationale for governance reform

12. The rationale for governance reform set out by RCVS was to provide greater public assurance and draw closer to the regulatory norm, as would likely be expected by government as part of any reform of the Veterinary Surgeons Act 1966. Respondents were invited to provide any comments on the rationale.
13. The majority of respondents supported the rationale for reform set out in the consultation. Many cited the need for the RCVS governance structures to be modernised, to align with wider regulatory norms or to update the Veterinary Surgeons Act 1966. A number also mentioned that reforms would be in the public interest or would support greater public trust and confidence in the profession. The majority of veterinary nurses, members of the public and other professionals/paraprofessionals agreed with the rationale. More veterinary surgeons agreed than disagreed, but there was not a clear majority within this group.
14. Reasons for not supporting the proposals included that moving away from elections would be undemocratic and would not serve the interests of the veterinary profession; that current arrangements did not need to change; and that the veterinary profession was an exception or should not be governed in a similar way to human healthcare professions.
15. A number of alternative proposals were put forward, including separating the Royal College and regulatory functions of the RCVS or creating separate governance structures within the RCVS for each of the different professions it regulated.

Themes

16. Comments made in support of the rationale for reform contained the following main themes.
 - a. **Need to modernise and reform** Many comments were made of a general nature recognising the need for change and modernisation in the RCVS's approach to governance and the need to reform the Veterinary Surgeons Act 1966, which some felt no longer reflected the realities of the profession.

IVC Evidensia: "We welcome the proposals which represent an important step in modernising the RCVS's governance structure, and support the proposed reforms."

- b. **Public confidence** A number of respondents felt reforms would increase or maintain public confidence in the veterinary profession. A small number also commented on the need for better outward communication to help the public understand the role of RCVS.

Association of Pet Behaviour Counsellors: “Regrettably the RCVS has an external perception of being 'for its own'... Having a reformed council (and better outreach for public information) will improve this.”

- c. **Aligning with the regulatory norm** A number referenced the need to come in line with widely accepted regulatory standards or with other regulatory bodies.

Blue Cross: “It is important for the profession to ensure we move closer to the regulatory norm to avoid our governing structure adding to the current lack of trust in the profession.”

- d. **Regulation of Allied Professions** Some respondents welcomed the suggestion of extending regulation to Allied Professionals.

McTimoney College of Chiropractic: “It is important that this reform takes place... to take into account the way the landscape has altered the care of animals including the growth and development of animal paraprofessionals.”

- e. **Public interest** Some respondents also referenced the need for RCVS to operate, and be seen to operate, in the interests of the public.

Veterinary surgeon: “We can no longer be a club... regulation must be objective, outward facing, looking after the genuine interests of the public and their animals’ welfare.”

Member of the public: “The views of the general public, who use the veterinary profession and pay for the services provided, are important. An election process with voting rights confined to members of the profession does not enable a holistic representation when regulating.”

17. Among the concerns and points made in opposition to the rationale, the following themes emerged.

- a. **Interests of the profession** A common theme was concern that the profession should have a say through elections, and that the reforms would result in worse outcomes for the profession as a whole. Some referred to other Royal College Councils with democratic electoral representation.

Lincolnshire Veterinary Referrals: “... a proposal which disenfranchises an entire profession.”

- b. **Veterinary profession as an exception** A similarly common theme among those opposing the proposals was that the veterinary profession was different to other professions and therefore following the “norm” may not be appropriate. Within this, a number referred to the dual status of RCVS as both a Royal College and a regulator. Some felt the proposals did not give sufficient attention to the Royal College function.

Progressive Veterinary Association (PVA): “As the RCVS is a Royal College that regulates, it will probably require a somewhat unique status, so that the regulatory norm for RCVS Council is not immediately obvious.”

North of Ireland Veterinary Association (NIVA): “NIVA accepts that there is a need to update the governance of the RCVS by moving closer to the current regulatory norm ... It is concerned however

that there is no early prospect of formal, tangible proposals for the parallel development of innovation and updating around the College's Royal Charter activities which in light of the current proposals, NIVA considers to be absolutely imperative."

- c. **Reform not required** A number argued that the reforms were not necessary, in some cases because they felt the main challenges facing the profession would not be addressed by governance changes.
 - d. **Human healthcare model not appropriate** Some argued that RCVS should not follow human healthcare, either because of perceived shortcomings and difficulties in the regulation of some human healthcare professions; or because of major differences in human healthcare including public funding and the need for the public to have a voice in their own treatment.
 - e. **Corporate influence** Some were concerned that corporate interests were having a negative impact upon the profession and that the proposals would not address this or could make it worse.
18. A small number requested **further information**, including more detailed proposals; benchmarking data on the current level of public confidence; or consideration of international comparisons.
19. A range of **alternative proposals** were put forward, in particular, a number suggested some form of **separation of RCVS functions**. A common suggestion within this was to consider **splitting the RCVS into two separate bodies**: a Royal College focused on advancement of the profession, and a separate regulator.

Association of Chartered Physiotherapists in Animal Therapy (ACPAT): "Separate the RCVS's powers of professional association/governing body and regulator to mirror the successful model of governance which is standard practice and has existed for many years in the human healthcare sector."

20. The **British Veterinary Association (BVA)** argued for a more holistic approach to governance reform. It broadly agreed with the proposals in so far as they related to the regulatory function of RCVS, but argued for different arrangements for the Royal College functions.

BVA: "A separate governing Council for the Royal College function should be established, with elected members. The Royal College Council should focus on the veterinary surgeons and veterinary nursing professions, while other allied professions should establish their own equivalent(s) of Royal College(s) if needed."

21. The **Register of Animal Musculoskeletal Practitioners (RAMP)** and the **Association of Chartered Physiotherapists in Animal Therapy (ACPAT)** proposed individual regulatory bodies for each profession, overseen by a "super regulator", described below. A similar model was proposed by the **Animal Health Professions' Register (AHPR)**.

RAMP: "Each of the individual professions (vets, vet nurses, MSK [musculoskeletal] etc) should have a regulator for their own specific profession... these individual regulatory bodies would be overseen

and audited by a super regulator (SR) similar to the Professional Standards Authority which oversees many professions in human healthcare. This overarching SR could still be the RCVS Council representing the whole Veterinary Healthcare industry but whose role would be specifically the oversight of the regulatory processes of each individual profession within the sector.”

22. The **British Veterinary Nursing Association (BVNA)** wished to see equality between veterinary surgeons and veterinary nurses in governance matters, rather than a “vet-led” model. If this was not the outcome, BVNA proposed increased responsibility be delegated to VNC.

BVNA: “We would prefer to see a more holistic, team-based approach to RCVS governance... providing equal influence and voting rights to veterinary nurses within RCVS Council... However, if it is deemed necessary that RCVS Council retains a professional majority of veterinary surgeons as the ‘lead profession’... we would welcome responsibility for governance, policy, voting rights and decision-making relevant to the veterinary nursing profession, all to be fully delegated to VN Council. This would move RCVS governance towards a model more aligned with human healthcare (i.e. separate regulatory bodies for doctors and nurses and midwives).”

23. In addition, **BVA**, **BVNA** and **AHPR** argued to reduce the size of RCVS Council. For **BVA** this was linked to a proposal to create a separate ‘Royal College Council’, while **BVNA** and **AHPR** argued that RCVS Council and VNC should be of equal size. Other suggestions made by small numbers included an independent complaints system, an ombudsman, an elected subcommittee to oversee Royal College functions or independent scrutiny of RCVS by a structure similar to the Professional Standards Authority (PSA), which oversees the regulation of human healthcare professionals.

BVNA: “We are still unclear for the justification of maintaining a Council which is much larger than the regulatory norm... BVNA feels that greater agility is afforded by a smaller Council of 10-12 members.”

Question 2: A fully appointed RCVS Council

24. Views were sought by RCVS on the proposal to move away from elections to a fully appointed RCVS Council, in line with the regulatory norm.
25. More respondents supported than opposed this proposal, although there was a range of opinions with a significant number of mixed and opposing views. Key reasons for support included that Council would be more representative of different groups and that appointments would be of higher quality, providing the specific skills needed for governance. Respondents also referred to an appointment system being fairer and avoiding the shortcomings of the current election system, as well as the need to modernise governance arrangements.
26. There were significant differences in views between groups. There was high support for the proposal among veterinary nurses, members of the public and other professionals/paraprofessionals. Views among veterinary surgeons were more evenly distributed, with slightly more opposing than supporting the proposal. Among organisations, a majority were broadly in agreement that the RCVS Council should be fully appointed.
27. Reasons for not supporting this proposal included a perception that an appointments system was more open to bias and corruption or concerns that it removed democracy. Concerns were also raised about appointees and the independence and transparency of the appointing panel. A number of respondents asked for more information or reassurance about the appointments system.

Themes

28. Among responses that supported the proposal for an appointed Council, the following main themes were evident.
 - a. **More representative Council** This was a common theme, with many referring to greater “balance” on the Council and improved representation. Some expressed support for representation of all four nations and different sectors. Small numbers made requests for representation of specific groups, such as those from other geographic areas, practice types, women or recent graduates.

Pets at Home: “Support an appointment system which implements standards such as coverage from all four nations of the UK and ensuring appropriate coverage of expertise from across the sector.”

- b. **Higher quality appointments** Another commonly expressed theme was the view that an appointment system would facilitate recruitment for the specific skills and expertise that the Council required.

BVA: “Appointment processes can ensure that Council Members possess the necessary skills and competencies to effectively govern... the RCVS could attract a more diverse range of experts, which should include members of the veterinary professions, with specific competencies required for regulatory governance.”

- c. **Election system weaknesses** A number of respondents referred to the shortcomings of the existing election system. Some mentioned low turnout for elections or referred to elections as a “popularity contest” or “badge of honour,” which would not necessarily result in the best candidates for the purposes of the Council.

PDSA: “The current electoral system is entirely dependent upon individuals putting themselves forward... [it] does not always align with a desire to strategically progress the work of RCVS council and may not result in an ideal mix of candidates for progression of council business.”

- d. **Fairness** Some felt that an independent appointment system would be fairer and more objective than elections.
- e. **Aligning with best practice or modern standards** Some respondents mentioned the need to come in line with regulatory norms, with some referring to human healthcare professions and the PSA guidelines.

BVNA: “The move towards independent appointment of Council members more closely aligns with the regulatory norm amongst human healthcare. We also feel that an appointment process better promotes inclusivity and diversity within the Council, whilst also ensuring the skills and qualities which are necessary to be effective in a governing position.”

29. Among responses that raised concerns or opposed the proposal, the following main themes were identified.

- a. **Concerns over appointees** Many respondents raised concerns about the type of appointment that would be made, commenting that ordinary vets would not gain appointment, that it would be a “club” or based on “who you know”, or that the process would attract professional committee members who lacked experience of frontline veterinary work. There were also concerns that inappropriate interests could gain influence, such as campaign groups or commercial interests.

Veterinary surgeon: "I do not want to see a Council made up of academics and those drawn from high positions in society... we need to have a Council which serves the public and especially animal owners and the profession as their first priority."

- b. **Risk of bias, corruption, cronyism** Another common theme related to concerns that an appointment system was more vulnerable to bias, corruption or cronyism, and lacked the safeguards of an election system. A number were concerned that it would put more power into the hands of the RCVS executive or government.

Veterinary surgeon: “Appointments ensure a 'tame' council that will not criticise government and excludes lone voices that challenge the actions of the council.”

Veterinary surgeon: “I have no confidence that appointments will be made on merit, rather than for political reasons or nepotism.”

- c. **Removes democracy or weakens the voice of RCVS members** A similarly common theme concerned the need for the profession to have a voice through democratic elections to Council. Some commented that the proposals were skewed too far towards the public interest and paid insufficient attention to the interests of the profession.

Synergy Farm Health: “We feel that elected members of the profession should represent us.”

Veterinary practice: “If this is to act in the interests of the public who will act in the interests of the veterinarian.”

- d. **Concerns over the panel** A number of respondents raised issues relating to the panel making the appointments, questioning whether it would be trusted, genuinely independent and transparent, and expressing concern over possible political interference.

PVA: “As we understand it... the RCVS would be picking the panel which will appoint Members to Council. This would not then be an independent process.”

- 30. A significant number requested **additional information or reassurance**, in particular, more detail on the selection and makeup of the panel, the criteria and process for appointment; or requesting transparency or further consultation on criteria. Some felt it was not possible to form a view on the proposals without more detail. There were also queries about cost implications; how oversight by a PSA-type organisation might operate; and whether there would be a mechanism to change the panel.

NIVA: “It is concerning that so little detail has been made available regarding the practical arrangements for the appointment of the new Council members, including those such as professional versus lay members, the selection process, qualifications and experience required, and terms of office.”

BEVA: “BEVA would like reassurance that diversity in terms of representation of all the major species groups will be prioritised during the appointment process.”

- 31. A number of respondents put forward **alternative proposals**, with the main themes as follows.
 - a. **Mix of appointed and elected** A number of respondents proposed a compromise whereby the Council would have more appointed members but would still retain some elected members. Some felt that this would realise the benefits of a more balanced Council whilst retaining a “voice” for the profession, while others suggested that a few elected members could guard against the Council becoming an “echo chamber”.
 - b. **Separation of RCVS functions** A number of respondents made general comments relating to some form of separation of regulatory and Royal College functions. Some suggested that an appointment system could be used for the regulatory body, while elections could be held for the Royal College governing body.

BVA: “We support the appointed RCVS Council as part of a comprehensive package of governance reforms, which includes the creation of a separate, elected Royal College Council. That body would be able to focus on the Royal College functions, maintaining a democratic process for the profession while allowing the ‘RCVS regulatory Council’ to function with the independence and expertise required for effective governance.”

- c. **Improved election system** A common proposal among veterinary surgeon responses was to adapt the existing election system to make it more representative. Suggestions included holding separate elections in all four nations, filtering/sorting candidates to meet certain criteria or looking at examples of professional bodies that used different types of electoral systems.

Veterinary surgeon: “Candidates for election could be “sorted” to ensure that a cross section of sectors is represented prior to voting taking place.”

- 32. Further detailed suggestions were made by small numbers. To ensure a broad spread of veterinary experience on Council, it was suggested to include representatives of small animal, farm animal, equine, exotics and mixed practice. Public health professionals were also proposed. A rotation arrangement was suggested to enable wider representation of different sectors and stakeholders. Suggestions were made relating to diversity on Council, including ensuring younger people were not disadvantaged in an appointment process. Some proposed considering remuneration, flexibility and timing of meetings, and whether the posts were full time, noting that these could restrict applicants, including those currently working in practice. It was also suggested that the majority of the panel appointing the Council should have veterinary experience.

Question 3: Towards lay parity on RCVS Council

33. Respondents were invited to comment on the proposal to reform RCVS Council to introduce either lay parity, or to maintain only a small majority of veterinary professionals.
34. Significantly more supported than opposed the overall proposal to move towards lay parity, however, there was no overall consensus as to the precise makeup of the Council (parity or small veterinary majority). The main reasons given in support of this proposal included the wider perspectives and experience that lay members could bring, the need to ensure public confidence and the need to align RCVS with the regulatory norm. The main reason for opposition was concern over the skills, experience and suitability of lay members. In addition, concerns were raised that RCVS would no longer be representative of vets and that vet representation would be further eroded by the addition of allied professionals to the Council. A number of respondents asked for more information on the proposal.
35. There were significant differences between groups. Among veterinary nurses, members of the public and other professionals/paraprofessionals there was a clear majority in support of the proposal. These groups also showed a strong preference for lay parity on RCVS Council, rather than a small majority of veterinary professionals. A majority of organisations supported the proposal overall, with many not expressing a preference for either parity or a small veterinary majority. Where a preference was expressed, similar numbers of organisations supported lay parity as supported a small majority of veterinary professionals.

Veterinary nurse: "I think that parity would be fine. Veterinary professionals do need to be represented alongside lay people but their vote should not be so great that the opinion of lay people (representing the animal owning public) is drowned out."

One Voice for Animals UK: "The regulator board should not be made up of a majority of veterinary professionals. It is there to ensure the public are getting the best service, and the veterinary professionals are doing what they should be... 1 or 2 veterinary professionals to provide the industry specific information and the rest of the board to be made up of lay people."

36. Views among veterinary surgeons were more finely balanced, with roughly equal numbers for and against the proposal. Most veterinary surgeons who expressed a view on the precise makeup of the Council wished to see some form of veterinary majority. A significant number of responses from vets did not specify whether they preferred a small majority, as suggested in the proposal, or a larger majority.

Veterinary surgeon: "Council must be designed and composed to allow it to discharge its regulatory responsibilities of setting and upholding standards, but must also be able to fulfil its Collegiate responsibilities of 'advancing and promoting' the profession... the public, animals and veterinary professionals would be best served by a Council composition that has a small majority of veterinary professionals to allow it to effectively fulfil its dual role."

Veterinary surgeon: "Veterinary surgeons with the appropriate qualifications, experience, and skill sets are the best people to judge, and set policy for standards of animal health and welfare... In many ways it undermines the expertise of veterinary surgeons if they are not in the majority on Council."

Having said that lay members should definitely be part of RCVS Council, and with the reasons outlined I would make it 60% Veterinary Surgeon and 40% lay members.”

Themes

37. The common themes in responses that supported the proposal to move towards lay parity were as follows.

- a. **Benefits of lay members** A number referred to the external perspectives, challenge and wider experience that lay members could bring, with experience of wider animal-related professions and the owner perspective commonly cited as examples.

Cattle Hoofcare Standards Board: “We support lay parity. We would expect lay persons to understand the current challenges facing the livestock sector and understand that better welfare is central to what trimmers are doing.”

Member of the public: “Having a mix of people will add value and provide some positive feedback into this body.”

- b. **Confidence** Some commented that lay parity would help ensure confidence in the Council and/or profession.

Veterinary nurse: “I think that many of the issues that the profession currently face are down to not listening enough to the client or layperson's perspective. Not only will more lay members increase input from this sector, but should help to increase public confidence.”

- c. **Aligning with best practice** Some respondents referred to the need to come in line with modern regulatory norms or commented that self-regulation was no longer acceptable.

BVA: “We agree that RCVS regulatory governance should be updated to align with the best practice seen in human healthcare regulators. This means ensuring a balanced composition of registrants and lay members, who are appointed based on clear competencies through an independent process.”

BVNA: “Lay parity is aligned with best practice in human healthcare regulators, and ensures public interests are better reflected within the governance composition.”

38. The following common concerns were raised about the proposal.

- a. **Concerns over lay members** Reservations about the skills or qualities of lay members was a very common theme, raised by both those who broadly supported the proposal and by those who opposed. This included concerns about a **lack of experience/knowledge**, including practical experience of veterinary work, clinical or sector-specific knowledge and understanding of ethical or welfare issues; and risk of **unrealistic, incorrect or hostile attitudes** towards veterinary practice, reflecting misconceptions held by the public. There were also concerns that campaign groups, commercial interests or other inappropriate groups could gain influence on the Council through increased lay membership.

Veterinary surgeon: "Any lay person may imagine how veterinary practice should occur from the safety of a committee meeting room while well rested, but vets and nurses may at least remember what it's like to work at the coal face."

Veterinary surgeon: "The veterinary surgeon must work in a unique environment where it must advocate for a patient whose health and welfare may be in conflict with its owner, additionally unlike other health professionals, finance plays a much greater role. Given this unique environment, it is essential that the veterinarian retains a majority."

- b. **Not representative of vets** Some who opposed the proposal argued that RCVS should stand up for vets or that vets should self-regulate, and some feared the result would be more vets leaving the profession.

Veterinary surgeon: "When I became a vet we felt the college were there for us. Now I feel if a member of the public has a grievance you are not there as an independent arbitrator but rather on their side."

- c. **Combined impact with Allied Professionals proposal** There were concerns about the longer-term impact of lay parity should the proposal to increase the proportion of APs be enacted (see Question 5 below). Some respondents were concerned that the combined impact of these two proposals would mean veterinary surgeons became a minority on the Council. Some asked for greater clarity on what the interaction between lay parity and increased allied professional representation would mean for the overall make up of Council and, in particular, the number of veterinary surgeons.

39. There was a number of requests for **further information**, including regarding the criteria for selection of lay members and their role on Council. Queries were raised over the timetable for implementation and safeguards against inappropriate appointments.

40. A number of **alternatives** were put forward, the most common being **separation of RCVS functions** into Royal College and regulator, with lay parity applying to the regulatory body only, proposed by **BVA** and others; and for the **Chair to have a casting vote**, as an alternative to a small veterinary majority.

41. Further suggestions, put forward by small numbers, included a range of groups that lay members should represent, namely: key sectors (equine, farming, companion, zoo, laboratory or animal breeding); animal welfare/animal rescue; related fields such as medicine/biology or wildlife/conservation/sustainability; allied professions or complementary/alternative therapies; or wider fields such as law, business, economics or academia. Conversely, others suggested lay members should not be from drug companies or other commercial interests. A number of alternative ratios were suggested, such as 50% vet, 25% nurse/AP, 25% lay; or parity between professionals already regulated by RCVS (vets plus nurses) and lay/AP. Election of lay members was also proposed, as well a review mechanism so that lay/professional proportions could be altered in light of experience.

Question 4: Removal of Veterinary School Council (VSC) appointees on RCVS Council

42. The Veterinary Schools Council (VSC) is the representative body of veterinary schools in the UK, Ireland and the Netherlands, and currently appoints three members to RCVS Council. Views were sought on the proposal to remove these direct appointees and ensure adequate educational expertise on Council through the independent appointment process instead.
43. The majority of respondents agreed with this proposal, with high levels of support among veterinary nurses, members of the public, organisations and other professionals/paraprofessionals. Key themes amongst those who agreed were that veterinary school input could be obtained in other ways; and that the existing system created a conflict of interest or gave excessive influence to VSC.
44. While levels of support were lower among veterinary surgeons than among other groups, significantly more agreed than disagreed with the proposal. Those who disagreed argued that veterinary school representation on Council was needed due to their critical role, or was important to maintaining high quality education. There was a number of requests for more information about the appointments system and how it might select educational expertise.

Themes

45. Among responses that supported the proposal, the following common themes were identified.
 - a. **Other ways to gain veterinary school input** Respondents suggested that direct appointment was not necessary as educational expertise could be selected via the independent appointment process, could be obtained from the RCVS Education Committee, or could be assured through effective consultation on education policies. Many commented that their support for the proposal was conditional on there being adequate representation of veterinary education via the appointments process, with a few clarifying that this must not be generic educational expertise.

Institute of Osteopathy (Animal Osteopathy Special Interest Group): "The contact between educational establishments and the regulator is vital... but that interface should be at a more tactical level, via a standing sub-committee of Council rather than at the level of Council directly – bringing the Veterinary Profession into parity with the wider healthcare sector."

One Voice for Animals UK: "The council should be quite independent of all representative bodies so the direct appointment of members shouldn't be allowed. I would expect that there would be another committee or platform for the VSC and others to be included."

- b. **Conflict of interest** Concerns were raised over the appropriateness of direct representatives of VSC, with a number commenting that they were not impartial and some referencing the financial interests of universities.

- c. **Excessive influence** A number of respondents felt that the veterinary schools had a disproportionate level of representation or that they held too much influence.

PDSA: "Educational establishments are currently over-represented when consideration is given to the wide range of stakeholders that may have a place on RCVS Council."

46. The following main themes were noted in responses expressing opposition to the proposal.

- a. **Veterinary schools need a voice on Council** A substantial number of respondents cited the critical role played by veterinary schools in educating the next generation and argued that this meant they needed representation. A number of these proposed that the number of VSC appointees could be reduced from three to one or two.
- b. **Impact on education** Some responses highlighted the importance of close working between veterinary schools and the Council, for example, to ensure courses remained fit for purposes, for fair assessment of veterinary education and reasonable inspection standards or to hold veterinary schools to account at Council.

PVA: "There should continue to be representation from the Veterinary Schools, as vital feedback from the expertise of teachers and researchers should feed into RCVS Council."

47. There were a number of requests for **more information**, in particular about how educational expertise would be represented under the revised system, the appointments process and the criteria for selection; and how quality of education and parity between courses would be assured under new governance. Queries were also raised about costs.

48. A number of **alternative and suggestions** were put forward. The **BVA** supported removal of VSC appointees from regulatory functions, but proposed they could sit on a separate Royal College governing body. Some suggested that veterinary school representatives should be elected, or that veterinary nurse education should be represented.

Coleg Gwent: "The VSC could consider including veterinary nursing into their council and the proposed independent appointment process could call for one representative of the VSC or one MRCVS and one RVN [registered veterinary nurse] member of the VSC."

49. Other suggestions made by small numbers included: keeping VSC appointees but removing their voting rights or giving them observer status; moving VSC appointees to the RCVS Education Committee; VSC recommending appointees to the independent appointments panel; and representation of allied professional education.

Question 5: Flexibility to increase representation of allied professionals on RCVS Council

50. The consultation sought views on the proposal that flexibility should be built into future governance composition so that the proportion of allied professional (AP) members on the Council could be increased over time, as and when new allied professions were added to the College's remit. It was also proposed that veterinary surgeons, as the lead profession, would retain a majority among the professionals on the Council.
51. A majority of responses were broadly in agreement with the proposal, but there were significant differences between respondent groups. Among veterinary nurses, members of the public and other professionals/paraprofessionals there was a clear majority in agreement. The main themes evident within responses in favour of the proposal were support for extension of regulation to APs and a view that APs would bring benefits to the Council.
52. For veterinary surgeons views were more mixed, but significantly more agreed than disagreed. Organisations were broadly in agreement, although a number raised concerns or proposed variations.
53. The main reasons for not supporting the proposal were opposition to RCVS regulating APs and concern over diluting the focus on veterinary surgeons, along with views that APs should not regulate vets and fears the Council would become unwieldy. Some particular concerns were raised about how the proposal could impact on veterinary nurses.
54. Others commented that they could only support the proposal if veterinary surgeons maintained a majority; that APs should not take veterinary places on the Council; or that APs should be represented on a dedicated AP Council or committee.
55. Others called for equality between professions rather than a vet-led approach, and there was a number of requests for regulation or representation of particular professions.

Themes

56. The following common themes were identified in responses supportive of the proposal.
 - a. **Support extending regulation to APs** Many expressed general support for extending regulation to more professions working with animals. Some raised concerns about unqualified practitioners and felt that regulation and standard setting was necessary to protect animal welfare. Some argued that Council representation would be necessary if APs were to be regulated by RCVS.

Veterinary surgeon: "I would welcome the regulation of these currently unregulated individuals from an animal welfare point of view."

- b. **Benefits of APs on Council** A number felt that APs would bring valuable expertise and a wider viewpoint to the Council, or could facilitate better joint working between different professions.

Institute of Osteopathy (Animal Osteopathy Special Interest Group): “These professions are a vital and increasingly needed part of the Veterinary team... inclusion of them at the highest level of Veterinary leadership signals the acceptance to all members of the Veterinary Team, the value that these roles play in the care and treatment of animals.”

Equine Sports Massage Association (ESMA): “Supports the proposal... welcoming the opportunity of a Council seat for an Allied Musculoskeletal Professional whose skills, knowledge and experience could be invaluable towards good governance.”

57. **Nurse representation** Another theme among responses, both for and against the proposal, was a desire to ensure that veterinary nurses were adequately represented on the Council. There were differing interpretations of what the proposal to increase AP representation could mean for nurses. Around half within this group felt that the RCVS proposal would improve the representation or status of nurses. However, others interpreted the proposal as worsening the situation of nurses, as they felt other APs could be elevated above nurses, could have more seats on Council than nurses or might take the places of nurses. Some asked for the proposal to extend to nurses only, not other APs, and parity between APs and nurses was also requested.

Veterinary nurse: “Stating that veterinary surgeons will always maintain a majority, while increasing the amount of allied professionals, in turn possibly decreasing the amount of RVNs will only increase this belief [that nurses are not respected] within the profession but also within the public.”

Veterinary surgeon: “I agree the number of veterinary nurses should slowly increase but the majority of professional members should always be veterinary surgeons.”

58. The **BVNA** requested a rebalancing between veterinary surgeons and veterinary nurses within the existing structure and urged that nurses should not be squeezed out as APs were added. It also requested clarity in communications as to whether nurses were included within the “allied professional” umbrella.

BVNA: “[VNC] does not afford its members voting rights, and therefore the same degree of influence as afforded to those on RCVS Council... We are concerned that as a growing number of allied professionals also hold seats on RCVS Council, there is a potential risk that veterinary nurses may not be represented at all in future... we urge that veterinary nurses must always be represented on RCVS Council, regardless of its future composition with allied professions.”

59. Among responses that opposed the proposal or raised concerns, the following major themes were identified.

- a. **RCVS should not regulate APs** A number of respondents felt that APs should be regulated elsewhere, not within RCVS, and some were concerned that the interests of APs and veterinary surgeons could conflict.
- b. **Focus on veterinary surgeons** A number expressed concern that inclusion of APs would dilute the focus of RCVS on veterinary surgeons. Some

expressed concern about the impact on the number of vets on the Council. A number of alternatives were proposed (see paragraph 61 below).

NIVA: "It would not take the addition of many para-professional representatives until vets would be in an overall minority ... This would not only be far from desirable, it would completely undermine the concept of the RCVS as a "Veterinary" Council – it would also severely restrict... representation for each of the main sectors... [and] regions of the UK. Moreover, were the professional seats to be limited to 12 (parity) from the outset, then the risk of the marginalisation of the pure "veterinary" representation rapidly increases further, to under a quarter"

- c. **APs should not regulate vets** A number were concerned about the prospect of other professions regulating vets, citing a lack of relevant expertise and knowledge on veterinary matters outside their area of specialism, and the inappropriateness of APs overseeing Royal College functions.
- d. **Unwieldy Council** There were some concerns the Council would become too large if it sought to have representation of every profession that came to be regulated. A few commented that this was at odds with the idea that Council members are not representing a specific constituency.

BVA: "Expanding the regulatory Council to include representatives from every allied profession could lead to an unwieldy and inefficient governance structure, complicating decision-making processes and potentially diluting the focus and expertise needed to effectively regulate the vets and veterinary nurses."

- 60. Some requested **more information** including clarity on the number of AP representatives and the impact this would have on veterinary surgeon representation; the timeline and implementation process; clarity on whether APs would regulate vets or whether they would sit on a sub Council; detail of how APs would be regulated; whether the proposals included nurses; and how nurse representatives would be nominated.

PDSA: "RCVS suggested that there would be parity between lay members and veterinary professionals, it would be prudent to ensure that the profession is clear that, it would appear, this does not mean veterinary surgeons in any proposals put forward."

- 61. A range of conditions, alternatives and suggestions were put forward.

- a. **Veterinary majority must be maintained** Many respondents commented that they could only support the proposal on condition that a veterinary majority was maintained. Most expressed this as a majority of veterinary surgeons, with smaller numbers referring to veterinary professionals or veterinary surgeons plus nurses. The consultation proposal stated that veterinary surgeons would "retain a majority among professionals". However, a number of respondents within this theme specified that they wished veterinary surgeons to hold the majority on the Council as a whole. Other respondents were not clear as to whether they wanted to see a majority on the Council as a whole, or among professionals.

Veterinary surgeon: “Happy with this as long as Vet surgeons have a small majority.”

- b. **Allied professionals must not take veterinary places** Some argued that rather than take places of veterinary surgeons or nurses, APs should take lay places on RCVS Council; or that the overall size of the Council should be increased to allow the addition of APs. Some suggested limiting the number of APs to one or two, e.g. with a rotation arrangement. A fixed ratio between veterinary surgeons, lay members and allied professionals was also proposed.

PVA: “The PVA fully supports the flexibility to expand the number of allied professional members on Council. However we urge that those seats be created anew to expand on the 24 Council seats, to perhaps 43.”

- c. **Separate Council/Committee for APs** Some respondents proposed a separate Council, or Councils, similar to VNC while others proposed a subcommittee or subcommittees. Some suggested that the separate Council/committee could have one or two representatives on the main Council, who would represent APs as a whole rather than their specific profession. Proposals of this nature were made by a number of professional bodies.

BVA: “Allied professions regulated by RCVS should have their own dedicated regulatory Councils, similar to the existing Veterinary Nurses (VN) Council. These dedicated Councils would report to RCVS regulatory Council and consider the specific regulatory challenges, standards, and professional development of their respective professions, ensuring that each group’s unique needs and perspectives are adequately represented and managed.”

BVNA: “If all allied professionals are considered to have an equal status to veterinary nurses, this would also then support the introduction of additional Councils for each allied profession, as per the current VN Council. We feel this may better represent the intricacies and specific needs of each of these professions, as opposed to addressing them all within the remit of RCVS Council.”

ACPAT: “ACPAT would like to see the proposal for a separate sub-council similar to that of the Veterinary Nurse Council set up to allow musculoskeletal therapists to have a voice within the new regulatory structure driving true tangible change within the industry. Representation at board level must be obtained for each professional group in order to guide and develop the industry.”

- d. **Requests for specific APs** There was a number of requests for specific APs to be regulated and/or represented on Council. Musculoskeletal professionals were frequently mentioned. There were also requests relating to equine dental technicians, animal fertility/ultrasound/artificial insemination, behaviourists, nutritionists, hoof trimmers, farriers and fish health professionals. A number of comments were made relating to particular qualification levels for APs (see annex).
- e. **Equal status among professions** A common theme among responses from other professionals and paraprofessionals was that veterinary surgeons should not be assumed to be the “lead profession” and that APs should be regulated alongside vets, not by vets. As in responses to earlier questions, some wished to see this reflected in the Council structure, with a Council for

each profession (including veterinary surgeons) overseen by RCVS in a role described by some as a “super regulator”.

AHPR: “There should be a veterinary surgeons council, which sits below RCVS council and alongside VN, MSK, EDT [veterinary nurse, musculoskeletal, equine dental technician] and other individual professional councils. This will provide greater transparency and see other professions regulated alongside vets rather than by vets.”

BVNA: “A more holistic team-based approach is more appropriate in [non-clinical] circumstances... applying the ‘vet-led team’ model to all other aspects of the veterinary nursing profession without question – in this instance, such as governance, strategy and the development of policy – is deeply flawed. This approach presents a missed opportunity to capture veterinary nurses’ existing capabilities to govern, plus to further enhance and develop the veterinary nursing profession in future.”

RAMP: “The proposal of giving other professions a seat at the table is progress but it must result in substantive change in the legislation to allow allied professions to deliver best care alongside, and not subordinate to, the veterinary profession... one seat on a RCVS Council dominated by vets would not automatically ensure progressive regulatory governance for MSK professionals.”

62. **BEVA** said that they accepted the proposal but requested extensive consultation on the detail of how it would be implemented:

BEVA: “Given the number of allied professionals working within the equine industry at present, and the impact that lack of regulation has had on the veterinary profession, this subject is one of great importance and sensitivity to BEVA. As such, we would like to emphasise the need for extensive consultation with BEVA if, and when, the objectives and processes for effecting this change are discussed.”

63. Other suggestions put forward by small numbers included adding APs prior to increasing lay membership in order to review impact; excluding professionals who may have a vested interest in changing regulation; and limiting the scope of the AP role on Council to matters related to their own profession.

Question 6: Separating the Chair of RCVS Council from the Presidency

64. The consultation sought views on the proposal to separate the role of RCVS President into two different posts. This would create a new President role to act as the public face of the College, retaining ceremonial duties; alongside a separate Chair role, which could be appointed for a longer period and would chair Council sessions and oversee RCVS governance. The Chair could be either a lay member or a registrant.
65. There was a high level of agreement with this proposal overall. There was very strong support among other professionals/paraprofessionals and members of the public, and high agreement among veterinary nurses. The main reasons given in support of the proposal were that the extended Chair tenure would provide greater continuity and that splitting the role would facilitate selection of good quality candidates with the specific skillset needed.
66. There was more of a spread of opinion among veterinary surgeons but most broadly agreed with the proposal. The main concern raised by those not supporting the proposal or expressing reservations was that the Chair should not be a lay person, while a number were concerned that the President's role would be diminished.

Themes

67. Responses in support of the proposal raised the following main themes.
- a. **Benefits of greater continuity** Many welcomed the proposal to extend the Chair's tenure, commenting that it would offer continuity in leadership and make it easier to deliver change. Small numbers suggested the tenure should be extended without splitting the role, or that the President's tenure should also be extended.

Institute of Osteopathy (Animal Osteopathy Special Interest Group): "The separation of these roles will ensure a better continuity of strategic leadership, reducing the risk of knowledge being lost as members change."

- b. **Attract more/better candidates** A number felt that separating the role into two could be beneficial as different skillsets were needed for each role. Respondents felt this approach could widen the candidate pool as some individuals may be suited to one role but not the other, for example, if they were not comfortable in the public-facing role.

Veterinary surgeon: "The skills are very different and a year is not long enough to bring about impactful change."

- c. **Effectiveness** Some commented that splitting the role could make the workload more manageable and allow postholders to focus on their role.

68. In responses that expressed concerns or opposition, the following key themes were noted.

- a. **Chair should not be a layperson** A common theme in responses both for and against the proposal was that the Chair must be a vet registrant. Some also commented that the President should not be a layperson. A small number argued that it should be possible for the Chair to be a nurse.

Veterinary surgeon: “Our profession is unique in our responsibility and advocacy for animal health and welfare, and I am uncomfortable with the possibility of a lay member as Chair.”

- b. **Diminishes the role of President** A number felt that the role of President would be less meaningful if it was mainly ceremonial in nature or argued that the public face needed to be the person with ultimate responsibility.

NIVA: “As presented this proposal appears to limit the role of the new “President” to that of a two-dimensional figurehead with no formal power or authority, beyond perhaps, responsibility for the Royal College’s Charter activities. As such NIVA believes that the role would struggle to have credibility and / or meaningful relationships or engagement with the profession’s membership.”

- c. **Cost** A number raised concerns over the cost implications and value for money of creating a second role. A small number queried whether ceremonial duties were required.

69. More **information** was requested regarding role descriptions of the President and Chair; how they would be selected (directly appointed or elected by Council members); and whether the Chair would also be a Council member. A small number requested consultation on the role descriptions.

70. The main **alternatives and variations** suggested were as follows.

- a. **President should be elected** This was suggested both for the existing Presidency model, and in a scenario where the role was split into a separate Chair and Presidency. There was no clear consensus on what an elected President would mean, and a number of the responses did not provide further detail on this. Small numbers suggested that the President should be elected from within the Council, or proposed direct election by the membership. In addition, a small number suggested that the Chair should be elected.
- b. **Maximum term length for Chair** Some requested a maximum term length to avoid the same person being appointed repeatedly and hence ensure some turnover and fresh ideas. The maximum terms suggested varied between two and eight years, with suggestions also for a fixed number of possible additional terms.

71. A number of more detailed suggestions were made by small numbers of respondents. Safeguards were suggested, such as mechanisms to remove the Chair or to break a deadlock between the Chair and the President. Alternatives were proposed such as increasing the number of Vice-Presidents or making more use of a

Vice-Chair role. The need for effective management and appraisal of the Chair role was also mentioned.

Question 7: Appointed Veterinary Nurses Council (VNC)

72. The existing VNC comprises of 14 members, of which 12 are elected and two appointed. The proposal from VNC was to move to a fully appointed system, with all VNC members selected via an independent appointment system.
73. The majority of respondents supported this proposal, reasoning that this could make the VNC more representative and diverse, would be consistent with proposals for the RCVS Council and with the regulatory norm, and would ensure the quality of appointments.
74. There were very high levels of support from veterinary nurses, with only a handful of responses opposing the proposal. The main themes within nurses' responses were improved representation and quality and effectiveness of appointed members.
75. There were also high levels of support amongst members of the public and other professionals/paraprofessionals. A large majority of organisations agreed with the proposals, including the **BVNA**. While views were mixed among veterinary surgeons, slightly more supported than opposed this proposal. Common reasons for not supporting the proposals included a desire to retain a democratic approach and concerns over appointed members not effectively representing nurses.

Themes

76. The following main themes were identified within responses that supported the proposal.
 - a. **More representative** A common theme was that an appointment system could deliver better representation of all four nations and different sectors. Respondents also requested representation of different geographical areas and types of practice. The need for better gender balance was also raised.

Veterinary Nurse: "Representation should be seen to reflect the length and breadth of the UK not solely the four nations but regional representation as far as reasonably practicable."

Veterinary Nurse: "Men make up only about 3% of the VN profession, but 30% of our VN council representatives... it is unrepresentative and sends the wrong message about gender power dynamics."

- b. **Consistency with RCVS** Another common theme was the importance of having the same approach for VNC as for RCVS Council.
- c. **Align with regulatory norms** Some argued that it would be beneficial to adopt the regulatory norm, with some commenting that this would provide greater independence and transparency or would inspire trust.

BVNA: "Independent appointment, working to the PSA's key principles of 'merit, fairness, transparency and openness, and inspiring confidence', ensures that public interests can indisputably be reflected in the appointment of members onto Council."

ACPAT: “This will further strengthen the governance structures and bring the RCVS in line with current standards set for regulatory bodies. Leading to greater animal welfare standards and public reassurance.”

- d. **Quality/effectiveness** Some argued that an appointments system could select people with the right skills or who would have greater engagement with the work of VNC. This was a significant theme among veterinary nurse responses in particular.

Veterinary Nurse: “Appointed members would allow selection for specific expertise and increase engagement with the work of Council.”

77. The following key themes were noted among responses that raised concerns or disagreed with the proposal.

- a. **Retain democracy** Many expressed a desire to maintain democratic representation and to give nurses a voice in the governing of their profession. Some also commented that an election system would be more representative and created a better relationship between nurses and VNC/RCVS.

PVA: “The composition of VN Council should be fully elected, and an appointment system should not be used. Veterinary nurses also have a right to democracy, and there should be annual elections to both VNC and for a small number of places (2-4 say), on RCVS Council itself.”

Veterinary nurse: “Currently I believe RVNs are side lined despite paying annual fees and I feel strongly we must have more say about our profession and the direction it takes.”

- b. **Concerns over appointees** A number were concerned that appointments would favour professional committee members over ordinary veterinary nurses, would lack diversity, would be divorced from the interests of nurses or would be vulnerable to influence by corporate or political interests. A number requested more information on the appointments process and selection criteria.

Veterinary nurse: “This will actively discourage diversity and inclusion... the appointment process would be something lots of good nurses would not want to do, as the process is controlled by the RCVS not by the veterinary nurses who can vote!”

- c. **Representation of all four nations not necessary** Many of these respondents supported the proposal overall, but they felt representation of four nations would be overly restrictive or that other aspects of diversity were more important.

78. A number of respondents put forward **alternative proposals**, with the following being the main themes.

- a. **Retain some elected members** Some argued for a mix of elected and appointed VNC members.

Member of the public: “A small number of elected members would be appropriate.”

Veterinary surgeon: “I think a combination of elected and appointed is preferable to increase diversity of viewpoint and encourage accountability.”

- b. **Improve election system** Some respondents suggested improvements to the existing electoral system including term limits, criteria for candidates, separate elections in each of the four nations or combining aspects of election and appointment to meet diversity/representation criteria, for example, an appointed shortlist of election candidates.
 - c. **Other alternative models** Some respondents put forward alternatives, including separating regulation and education/promotion of the profession into different bodies; making VNC a subcommittee alongside a veterinary surgeon subcommittee feeding into an over-arching Council; combining VNC and RCVS Council; and randomly selecting nurses to serve on VNC, akin to jury service.
79. Some specific suggestions were made as to groups that should be represented on VNC, including nurses working in practice, student nurses, musculoskeletal professionals, animal behaviourists, equine dental technicians, patient care assistants and animal rescue, as well as fewer educational representatives. Increased nurse representation on RCVS Council was also requested.

Question 8: Reducing the size of VN Council

80. Views were also sought on the proposal to reduce the size of VNC from the current 14 members to 12, to come in line with regulatory best practice.
81. The majority of responses were in favour of this proposal, with the main themes in support being that this would reduce costs, bring the VNC into line with regulatory norms or would have minimal impact. There were no major differences between groups, with the majority of all respondent types agreeing with the proposal. The **BVNA** were also in agreement.
82. Key reasons given by those disagreeing with the proposal were that more evidence was needed of the case for change, a smaller VNC would be less representative and that the VNC should not reduce in size if the RCVS Council did not similarly reduce.

Themes

83. Within responses supportive of the proposal, the following main themes were identified.

- a. **More efficient** A number commented that a smaller group would be more effective or would streamline decision making, and a few also raised cost effectiveness.
- b. **Adopt the regulatory norm** A number of respondents mentioned the need to come in line with regulatory best practice, and a small number referenced organisations who suggested 12 as an optimal number.

BVNA: “We support the recommendation that VN Council should be reduced to 12 members, to be brought into alignment with the regulatory norm.”

- c. **Minimal impact** Some considered that the proposal would make little difference as VNC was already close to the regulatory norm of 12 members.

84. Responses that raised concerns or did not agree with the proposal contained the following main themes.

- a. **More evidence needed** A number of respondents felt the case for change had not been made. Some argued that a reduction in size would not automatically lead to improved strategic focus and asked to see further reasoning or evidence on this point, or a review process.

Pets at Home: “As the proposals are further developed, we recommend an approach which considers necessary roles and expertise over an ideal number.”

- b. **Insufficiently representative** A number were concerned that VNC would be less representative with fewer members, some referring to the additional impact of lay parity. In addition, some commented that they could support the proposal if they were reassured that VNC would be sufficiently representative.

PVA: "[VNC] may need to expand to reflect geographical regions, emerging specialities, profession sectors or allied professions for example, including vet members of VNC... we support building in the flexibility to further increase the number of seats on VNC rather than reducing VNC numbers."

- c. **RCVS is not reducing in size** Some argued that there was inconsistency in the proposals for VNC and RCVS Councils, as RCVS numbers were significantly higher than the regulatory norm.

Blue Cross: "We are not sure of the reasoning in reducing the size of VN council to fit with the regulatory norm, when there is no such recommendation for the Vet council (which at 24 is much bigger)."

- 85. A number of requests were made for **additional information**, including on costings, typical meeting attendance numbers, the impact on quoracy, how operational matters could be dealt with if not at VNC, and the original rationale for 14 members. A number felt it was not possible to give a view without this information.
- 86. **Suggestions** included increasing the size of VNC; further reducing the size; allowing for flexibility in size; introducing additional lay members first before making a decision on optimal size; and short-term co-option of members where additional skills were needed.

Question 9: Lay parity for VN Council

87. The consultation sought views on the proposal that VNC should comprise equal numbers of lay and professional members, in line with regulatory best practice.
88. More respondents agreed with this proposal than disagreed, but there was significant variation between different groups. There was a majority in support among members of the public, other professionals/paraprofessionals and organisations (including the **BVNA**).
89. Responses from veterinary nurses were more mixed, but more supported than opposed the proposal. Key themes in support of the proposal included that lay members would bring wider skills to the VNC, that this would align the VNC with the regulatory norm and that it would increase confidence.
90. For veterinary surgeons, slightly more disagreed than agreed. The main reasons given for disagreeing with the proposal were concerns over the experience and knowledge of lay members and the view that the existing lay representation was sufficient.

Themes

91. Among those responses that supported lay parity for VNC, the following main themes were evident.
- a. **Benefits of lay members** A number argued that lay members would bring benefits to VNC including a wider perspective.

Veterinary Nurse: “Equalising Lay Person representation would help remove perceived nepotism and enrich debate because again nurses, just like Vets, do not necessarily appreciate the impact that their decision-making has on owners.”

Member of the public: “Lay members can often see the wood for the trees and give a different perspective to a problem or decision.”

Veterinary surgeon: “We need input from external views and we need others to promote the nursing profession from the 'outside'.”

- b. **Alignment with the regulatory norm** Some referred to lay parity on governing bodies as recognised best practice.

Veterinary surgeon: “[This is] appropriate, to exclude the concept of ‘marking your own homework’.”

- c. **Public confidence** Some felt that lay parity would help give additional confidence to the public.

Institute of Osteopathy (Animal Osteopathy Special Interest Group): “It has been established in the wider healthcare regulation sector, that the Lay role brings a significant degree of public confidence in the accountability of a profession.”

92. Within responses that did not support the proposal, the following main themes were evident.

- a. **Professional majority should be maintained** This was a very common theme among those not in support of the proposal. Some argued that a small professional majority should be acceptable for VNC as it was considered acceptable for RCVS Council.

Veterinary Nurse: “When we are at such a vital period for the veterinary nurse profession I would like to see a small majority being RVNs.”

Coleg Gwent: “A small majority of professional members would be welcomed, whilst increasing lay members. This is to ensure that animal welfare interests are better served by the most qualified persons.”

- b. **Concerns over lay members** This was also a significant theme, with particular concerns over lack of relevant experience, lack of clinical knowledge and lack of understanding of the veterinary nurse role. There were also concerns that commercial interests could gain excessive influence through lay membership.

Veterinary Nurse: “There are ethical issues which the professionals have more knowledge and understanding about which lay members may not.”

Member of the public: “Only those legally bound by the VSA should, having taken aboard the ideas of Lay members, be responsible ultimately for decisions.

Veterinary surgeon: “Everyone has an opinion on animal welfare, how can we be sure sensible individuals are chosen and not lobbying group representatives.”

- c. **Not required** It was argued by some that VNC already acted in the interests of the public, that the existing lay representation was sufficient or that other changes could be made to better represent the public such as introducing a lay committee.

93. There were a small number of requests for **further information** regarding the selection process and criteria, the type of lay member envisaged and the impact on costs.

94. A number of other **alternatives** were put forward by small numbers of respondents, including: a lay majority; applying lay parity to regulatory functions but not Royal College functions; appointing allied professionals, major employers or educators instead of lay people; and election of lay members. Alternative ratios were proposed, including an even split of nurses, APs and lay people, or six nurses, two vets, four lay; and it was proposed that the Chair should always be a nurse. It was also suggested that if VNC was to become a subcommittee feeding into an over-arching Council, there should be lay parity on the over-arching Council but not on VNC.

Annex: Additional queries, evidence and suggestions

This annex provides additional examples of further queries, evidence and suggestions provided by respondents. Not all proposals elicited more queries, evidence or suggestions than could be covered in the main body of the report, therefore the tables below do not cover every question.

Question 1: Rationale for governance reform

| Queries | Evidence | Suggestions |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Are positions to be remunerated and if so what will be the impact on professional fees? • How RCVS Knowledge and the Advancement of the Professions Committee would impact on paraprofessionals. • How Royal College functions would be overseen in the new model, and how will non-regulatory functions remain fully independent of regulatory "interference". | <p>In relation to following a human healthcare model:</p> <ul style="list-style-type: none"> • Medical Royal Colleges are not fully appointed and many have democratic representation. • Human healthcare falls mainly under the NHS. BMA regulates public sector employees with a government set business structure, whereas RCVS members work primarily in the private sector. • Lay people represent the patient in the human model. Which would not be the case for RCVS. • Lay parity not considered to have been successful in professions including nursing, midwifery, dentistry, medicine. • When considering Law Commission Regulation of Health Care Professionals (2014) it is important to recognise that other than consolidation, simplification and imposing greater consistency across regulators in some areas where there is public interest, it stresses that beyond this regulators would be given greater autonomy to be able to deliver their functions in a way that is suited to the profession concerned. RCVS should not mimic other regulators but analyse and understand what regulation of the veterinary profession requires. | <p>In relation to separation of Royal College and regulatory functions:</p> <ul style="list-style-type: none"> • Human medics have a myriad of subject specific Royal Colleges there to support them, alongside the BMA (which is more of a union), and these organisations have the ear of government. Whilst the veterinary profession may be small, they deserve to have more structured, organisations there to support them. Perhaps the RCVS should set up a GMC equivalent that regulates, leaving the Royal College component to support the profession. • The lesson from the Law Society is that there had to be a clear separation of regulator and profession. |

Question 2: A fully appointed RCVS Council

| Queries | Evidence | Suggestions |
|------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> Would an appointment system mean more RVNs were eligible to be members of the Council? | <p>In relation to other professions:</p> <ul style="list-style-type: none"> Medical profession: difficulties between GMC and BMA, challenge to GMC by Anaesthetists Unite, issues with physician associates, criticism of midwifery regulator, example of dentistry suggests an appointed regulator will not be an improvement on the current situation. Legal system/judges: appointments believed to be a "tap on the shoulder" system which is not representative/diverse. Social Work England has not achieved improvements in the profession, and standards in social care in the UK are considered to be far below standards in veterinary practice. House of Lords cited as an example of an appointment system that is regarded by the general public as biased, corrupt or politically influenced. National Trust and RSPCA as examples of appointments being monopolised by minority views. <p>Impact on diversity:</p> <ul style="list-style-type: none"> If we read the literature on diversity and inclusion, using merit as a criteria will reduce diversity. Merit tends to be based on the socio-economic background of an individual rather than true ability... higher profile members of the profession will be selected more frequently, and whether an individual is high profile depends more on their personality type than abilities as a veterinary surgeon or potential regulator. | <ul style="list-style-type: none"> The BMA elects members representing different regions and branches and also has 5 seats reserved for ethnic minority members. The RCS has introduced 19 additional seats to allow representation of dental surgeons and other appointed and invited members. A similar model could be used to improve representation within RCVS. including allied professionals, without doing away with elections. A hybrid of the models used for Council Elections by the RCS and BMA might provide a good fit with traditional democracy of the profession, but one which also allows the number of Councillors from allied professions to grow, along with allowing for the appointment or election of lay people and for both appointed and invited members. For example there could be a bigger Council of, say, 43 members, comprising 24 elected Councillors (Say, 6 elected and standing down each year) and 19 additional seats. The 19 additional members could then also allow for growth of, and representation for, the allied veterinary professions, through a mix of: democratically elected regional vets, democratically elected sector vets, democratically elected RVNs, democratically elected representatives of allied professions, appointed or elected lay people, invited members, appointed members. Royal Society of Biology elects from a range of people who have submitted CVs. Other professions have elected systems that should be explored, e.g. RIBA (architects), actuaries. |

Question 5: Flexibility to increase representation of allied professionals (APs) on RCVS Council

Comments and suggestions for this question related to qualifications of APs that may be regulated by RCVS or represented on RCVS Council.

| General | Musculoskeletal (MSK) | Other APs |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Paraprofessionals need government body recognition and appraisal/ industry experience before participation. • The quality of the qualifications of the paraprofessionals eligible for election should be regulated. • Needs to be a clear standard set for the level/type of qualification required to be recognised as a member of each of these professions and use the titles associated. • As long as the paraprofessionals have a requirement to be members of their own regulatory bodies and are suitably qualified. • RCVS and vets should only work with paraprofessionals where there is regulation in place, such as equine dentists and farriers. • Limits should be set which restricts any allied professional body considered part of the regulated team to those who have reached Masters level qualification. • Veterinary paraprofessionals on the Council should be BSc/Masters degree/Doctorate level • Criteria/thresholds that Allied Professionals would have to meet to be considered for a seat on the Council should be published and approved. | <ul style="list-style-type: none"> • You say musculoskeletal but please state vet physios who are degree level and have expertise a vet may not have. • Level 7 MSK professionals should be able to work autonomously as vets do but all be regulated the same way. The regulatory model needs to be able to eventually be expanded to include (maybe another tier of qualifications?) the 'lower level' qualified such as a level 4 massage practitioner. • Representation of the MSK profession on council should be based upon MSc level university-validated animal qualification as the highest level of training and therefore equivalency to veterinary diversification in specialist areas. • Representation should come from both animal physiotherapy and animal chiropractic, reflecting that these professions have different scopes of practice and protocols. There is different legislation and regulation for chartered physiotherapists and chiropractors in human practice for this reason and so in veterinary regulation they should be represented separately too. • Support MSK therapists being on the council, but there are a wide variety of qualifications and professional titles so this would need to be looked at e.g. veterinary physiotherapist, chiropractors, massage therapists etc. | <ul style="list-style-type: none"> • In the behaviourist profession, Only CCAB and FABC should be considered and regulation of behaviourists should be enforced to bring all into align and minimum standards, especially as vets remain responsible for patients referred to non-vets. The number of member bodies in such professions is not workable and impacts integrity and upholding professionalism. For example, one body should regulate APBC, ABTC, APDT, etc. |

Question 6: Separating the Chair of RCVS Council from the Presidency

| Queries | Evidence | Suggestions |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">• Not clear whether the proposal is for president and Chair to be appointed or elected.• Will Chair be combined with CEO role? | <ul style="list-style-type: none">• Evidence in management and business journals is that it is better governance to have a separate President and Chair. | <ul style="list-style-type: none">• However the thinking in director association and director institutes is that a chair is an existing member of a council or board, and is decided by board members, not as part of a separate election or appointment process. The president is either elected or selected based on recommendations from a nominations panel or committee. (NB – same respondent as provided evidence' comment)• Criteria for roles should be published |

| Summary | |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Meeting | Council |
| Date | 7 November 2024 |
| Title | Preliminary Investigation Committee Report to Council |
| Summary | This report describes the work of the Preliminary Investigation Committee since RCVS Council's last meeting, including by reference to key stage indicators, and provides information about the nature of concerns being considered by the RCVS. |
| Decisions required | None |
| Attachments | None |
| Authors | <p>Chris Murdoch Senior Case Manager c.murdoch@rcvs.org.uk</p> <p>Gemma Crossley Head of Professional Conduct g.crossley@rcvs.org.uk</p> |

| Classifications | | |
|------------------------|-----------------------------------|-------------------------------|
| Document | Classification¹ | Rationales² |
| Paper | Unclassified | n/a |

¹Classifications explained

| | |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Unclassified | Papers will be published on the internet and recipients may share them and discuss them freely with anyone. This may include papers marked 'Draft'. |
| Confidential | Temporarily available only to Council Members, non-Council members of the relevant committee, sub-committee, working party or Board and not for dissemination outside that group unless and until the relevant committee or Council has given approval for public discussion, consultation or publication. |
| Private | The paper includes personal data which should not be disclosed at any time or for any reason, unless the data subject has agreed otherwise. The Chair may, however, indicate after discussion that there are general issues which can be disclosed, for example in reports to committees and Council. |

²Classification rationales

| | |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Confidential | <ol style="list-style-type: none"> 1. To allow the Committee or Council to come to a view itself, before presenting to and/or consulting with others 2. To maintain the confidence of another organisation 3. To protect commercially sensitive information 4. To maintain public confidence in and/or uphold the reputation of the veterinary professions and/or the RCVS |
| Private | <ol style="list-style-type: none"> 5. To protect information which may contain personal data, special category data, and/or criminal offence data, as listed under the General Data Protection Regulation |

Preliminary Investigation Committee

Report to Council November 2024

Introduction

1. This report provides information about the activities of the Preliminary Investigation Committee since the last report (25 October 2024 being the date of writing the report).
2. Since the last Report to Council (which gave information to 24 May 2024), there have been 10 Stage two Preliminary Investigation Committee (S2PIC) meetings (5 June, 19 June, 3 July, 17 July, 7 August, 21 August, 4 September, 18 September, 9 October, 23 October).

New cases considered by the S2PIC

3. The total number of new cases considered by the S2PIC at the 10 meetings referred to above is 21. Of the 21 new cases considered:
 - 12 were concluded at first consideration by the Committee.
 - 9 cases were referred for further investigation, that is, further enquiries, visits and/or preliminary expert reports.
4. No cases have been referred to the RCVS Health or Performance Protocols in the reporting period.

Ongoing Investigations

5. The Stage two PI Committee is currently investigating 19 ongoing cases where the Committee has requested statements, visits or preliminary expert reports (for example).

Health Protocol

6. There are no veterinary surgeons either under assessment or currently on the RCVS Health Protocol.

Performance Protocol

7. There are no veterinary surgeons currently on the RCVS Performance Protocol.

Professional Conduct Department - Enquiries and concerns

8. Before registering a concern with the RCVS, potential complainants must make an Enquiry (either in writing or by telephone), so that Case Managers can consider with the enquirer whether they should raise a formal concern or whether the matter would be more appropriately dealt with through the Veterinary Client Mediation Service.
9. In the period 24 May to 25 October 2024,
 - the number of matters registered as Enquiries was 1547, and
 - the number of formal Concerns registered in the same period was 287.

10. The table below shows the categories of matters registered as Concerns between 24 May and 25 October 2024.

Concerns registered between 24 May and 25 October 2024

| Description of Category | Number of Cases |
|--------------------------------------------------------------------------------------|------------------------|
| - Advertising and publicity | 1 |
| - Appeal against DC decision | 1 |
| - Certification | 3 |
| - Client confidentiality | 1 |
| - Clinical and client records | 6 |
| - Clinical governance | 0 |
| - Communication and consent | 12 |
| - Communication between professional colleagues | 5 |
| - Conviction | 3 |
| - CPD compliance | 0 |
| - Delegation to veterinary nurses | 0 |
| - Equine pre-purchase examinations | 2 |
| - Euthanasia of animals | 9 |
| - Euthanasia of animals – ‘Tuk’s law’ | 1 |
| - Fair trading requirements | 0 |
| - Giving evidence for court | 0 |
| - Health case (<i>potential</i>) | 1 |
| - Illegal practice | 0 |
| - Microchipping | 0 |
| - Miscellaneous | 5 |
| - Practice information, fees & animal insurance | 6 |
| - Performance case (<i>potential</i>) | 0 |
| - Recognised veterinary practice | 0 |
| - Referrals and second opinions | 0 |
| - Registration investigation | 0 |
| - Restoration application | 0 |
| - Social media and networking forums | 5 |
| - Treatment of animals by unqualified persons | 0 |
| - Use of samples, images, post-mortems and disposal | 0 |
| - Veterinary care | 200 |
| - Veterinary medicines | 9 |
| - Veterinary medicines – application of factors without physical examination | 1 |
| - Veterinary medicines – prescribing CDs/antimicrobials without physical examination | 2 |

| | |
|----------------------------------------------------|------------|
| - Veterinary medicines – ‘under care’ query, other | 3 |
| - Veterinary teams and leaders | 2 |
| - Whistle-blowing | 1 |
| - 24-hour emergency first aid and pain relief | 6 |
| - Unassigned | 2 |
| Total | 287 |

Data source – Profcon computer system concerns data.

Referral to Disciplinary Committee

11. In the period 24 May to 25 October 2024, the Committee has referred 13 cases involving 8 veterinary surgeons to the Disciplinary Committee.

Referral to Charter Case Committee

12. In the period 24 May to 25 October 2024, the Committee has referred 1 case involving 1 veterinary surgeon to the Charter Case Committee.

Veterinary Investigators

13. The Chief Investigator and Veterinary Investigators have undertaken 5 unannounced visits in the reporting period. The first two were unannounced site visits in conjunction with the VMD to the premises of fertility clinics. The third, fourth and fifth were unannounced visits to a veterinary surgeon to serve disciplinary papers.

Concerns procedure

14. As Council is aware, the process for the consideration of concerns at Stage one changed at the beginning of October 2022. The median number of weeks in which cases concluded at Stage one can be seen below.

| Month in which case concluded | Median number of weeks taken |
|--------------------------------------|-------------------------------------|
| February 2023 | 13 |
| March 2023 | 13.3 |
| April 2023 | 14.9 |
| May 2023 | 14.3 |
| June 2023 | 14.4 |
| July 2023 | 15 |
| August 2023 | 15.9 |
| September 2023 | 13.4 |
| October 2023 | 12.6 |
| November 2023 | 18.3 |
| December 2023 | 11.5 |
| January 2024 | 16 |
| February 2024 | 15 |
| March 2024 | 17.6 |
| April 2024 | 15 |
| May 2024 | 2.9 |

| | |
|----------------|------|
| June 2024 | 19.9 |
| July 2024 | 11.9 |
| August 2024 | 15.2 |
| September 2024 | 13.9 |

15. PIC/DC Liaison Committee considered detailed information on the time taken by cases at Stage one at its meeting in November and discussed a new KPI timeframe in light of the data provided and the steps involved in the process. The Liaison Committee concluded that six months was an appropriate timeframe. It also concluded that it would still be helpful to provide median times taken, as this is a good indicator of the most likely duration of matters for those involved in the process.
16. In line with the above KPI, cases that commenced in September and October 2023 have been assessed retrospectively to determine what percentage of them met the six-month KPI. These can be seen below, and we continue to report on this percentage in the future.

17.

| Month case started | Cases that met KPI |
|---------------------------|---------------------------|
| October 2023 | 94% |
| November 2023 | 87% |
| December 2023 | 84% |
| January 2024 | 86% |
| February 2024 | 93% |
| March 2024 | 87% |

18. The Stage 2 KPI is currently for the PIC to reach a decision on simple cases before it within seven months. A case is deemed to be complex where the PIC requests that witness statements and/or expert evidence be obtained. At its meeting in May 2024, PIC/DC Liaison Committee, having undertaken a full review of the Stage 2 KPI, concluded that it was not appropriate to have a KPI for complex cases, in view of the specific complexities of each case. Cases are reported in detail to that Committee, which is able to discuss and monitor performance accordingly.
19. In the period 24 May 2024 to 25 October 2024, the PIC reached a decision (to close, refer to the Charter Case Committee, or refer to DC) within the relevant KPI in 9 out of 13 simple cases.
20. 20 complex cases were decided. In accordance with the above, these cases (and the work of the department in general) are reported and discussed in detail at the PIC/DC Liaison Committee meeting.

Illegal practice

21. Since the last Report to Council (which gave information to 24 May 2024), 7 new reports of suspected illegal practice have been received. Of these, 5 have been closed after issuing advice/cease and desist letters or referring matters to other relevant agencies; and 2 are subject to ongoing enquiries. There is a total of 4 ongoing enquiries.

Operational matters

22. A new lay member joined the PIC in July along with a new veterinary nurse member joining the VNPIC. A new Chair was appointed to VNPIC after an application process. All have settled well into their new roles.

23. An external audit on PIC cases has recently been completed and will be reported in detail to Liaison Committee for its next meeting.

| Summary | |
|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Meeting | Council |
| Date | 7 November 2024 |
| Title | RVN Preliminary Investigation Committee Report to Council |
| Summary | This report sets out the work of the Registered Veterinary Nurse (RVN) Preliminary Investigation Committee (PIC) |
| Decisions required | None |
| Attachments | None |
| Authors | <p>Sandra Neary Secretary to the RVN Preliminary Investigation Committee s.neary@rcvs.org.uk / 020 7202 0730</p> <p>Gemma Crossley Head of Professional Conduct g.crossley@rcvs.org.uk / 020 7202 0740</p> |

| Classifications | | |
|------------------------|-----------------------------------|-------------------------------|
| Document | Classification¹ | Rationales² |
| Paper | Unclassified | n/a |

¹Classifications explained

| | |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Unclassified | Papers will be published on the internet and recipients may share them and discuss them freely with anyone. This may include papers marked 'Draft'. |
| Confidential | Temporarily available only to Council Members, non-Council members of the relevant committee, sub-committee, working party or Board and not for dissemination outside that group unless and until the relevant committee or Council has given approval for public discussion, consultation or publication. |
| Private | The paper includes personal data which should not be disclosed at any time or for any reason, unless the data subject has agreed otherwise. The Chair may, however, indicate after discussion that there are general issues which can be disclosed, for example in reports to committees and Council. |

²Classification rationales

| | |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Confidential | <ol style="list-style-type: none"> 1. To allow the Committee or Council to come to a view itself, before presenting to and/or consulting with others 2. To maintain the confidence of another organisation 3. To protect commercially sensitive information 4. To maintain public confidence in and/or uphold the reputation of the veterinary professions and/or the RCVS |
| Private | <ol style="list-style-type: none"> 5. To protect information which may contain personal data, special category data, and/or criminal offence data, as listed under the General Data Protection Regulation |

Registered Veterinary Nurses Preliminary Investigation Committee

Report to Council

Introduction

1. Since the last Report to Council, there has been four meetings of the Stage 2 VN PIC, which took place on 28 May, 9 July, 20 August and 1 October. The next meeting is scheduled to take place on 12 November 2024.

RVN Concerns received / registered

2. In the period 24 May to 25 October, there were 31 new Concerns relating to RVNs. Of these 31 new Concerns:
 - 9 cases closed at Stage 1 VNPIC;
 - 19 cases are currently under investigation by a Case Manager, Veterinary Nurse, Veterinary surgeon, and a lay member (Stage 1 VNPIC);
 - 3 cases have been referred to Stage 2 VNPIC.

RVN Preliminary Investigation Committee

3. Six new cases have been considered by the Stage 2 VNPIC between 24 May and 25 October. One case was closed. Three cases were closed with advice. One case was referred to external solicitors for formal statements to be taken. One case was referred to the RVN Disciplinary Committee.

Ongoing Investigations

4. Eleven concerns are currently under investigation by the Stage 2 VN PIC, and these will be returned to the Committee for a decision in due course.

Health Concerns

5. There are currently no RVNs being managed in the context of the RCVS Health Protocol.

Performance Concerns

6. There are currently no RVNs being managed in the context of the RCVS Performance Protocol.

Referral to Disciplinary Committee

7. Since the last report, two cases have been referred to the RVN Disciplinary Committee.

Disciplinary Hearings

8. Since the last report, one disciplinary hearing has taken place in relation to a veterinary nurse. At the outset of the hearing the Respondent made an application to adjourn the hearing while undertaking to voluntarily remove herself from the Register, to never seek to reapply to join the Register and to supply a witness statement in respect of a separate RCVS investigation into the conduct of a veterinary surgeon. The Disciplinary Committee decided to accede to the application and accept the Respondent's undertakings.

Operational matters

9. In July 2024, a new veterinary nurse (Arlene Connor) joined the VNPIC, and a new Chair was appointed to VNPIC (Mark Stobbs) after an application process.