

<b>Summary</b>	
Meeting	Standards Committee
Date	12 June 2024
Title	Standards Committee Minutes
Summary	<p>Minutes of Standards Committee meeting held remotely on Wednesday, 12 June 2024, at 9:30am</p> <p>The Committee's attention is drawn to paragraphs 1-29 of the classified appendix.</p>
Attachments	Classified appendix
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<b>Classifications</b>		
<b>Document</b>	<b>Classification<sup>1</sup></b>	<b>Rationales<sup>2</sup></b>
Minutes	Unclassified	n/a
Classified appendix	<b>Confidential</b>	1, 2 and 3

**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"> <li>1. To allow the Committee or Council to come to a view itself, before presenting to and/or consulting with others</li> <li>2. To maintain the confidence of another organisation</li> <li>3. To protect commercially sensitive information</li> <li>4. To maintain public confidence in and/or uphold the reputation of the veterinary professions and/or the RCVS</li> </ol>
Private	<ol style="list-style-type: none"> <li>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</li> </ol>

## Minutes of the Standards Committee meeting held in-person and remotely on Wednesday 12 June 2024

**Members:** Linda Belton (Chair)  
Claire McLaughlan  
Danny Chambers  
Olivia Cook  
Will Wilkinson  
Derek Bray  
Alice McLeish  
Tim Walker  
Melissa Donald  
Matthew Rendle  
Sue Paterson

**In attendance:**

<b>RCVS</b>	Lizzie Lockett	CEO
	Eleanor Ferguson	Registrar
	Gemma Kingswell	Head of Legal Services (Standards)
	Beth Jinks	Standards and Advisory Lead
	Stephanie Bruce-Smith	Senior Standards and Advice Officer
	Ky Richardson	Senior Standards and Advice Officer/Solicitor

<b>Defra</b>	Laurentiu Patea	Veterinary Advisor
	Bhavisha Patel	Veterinary Advisor
	Arjen Brewer	Veterinary Advisor
	Annabel Holton	Senior Policy Advisory for Future Import Policy
	Kirsty Scotter	Policy Lead on Trusted Trader Programme

### AI 1 Apologies for absence, declarations of interest, minutes from the meeting of 16 April 2024.

1. Apologies were received from L Allum. D Chambers did not attend.
2. O Cook declared an interest in relation to AI 2(c). She explained she was a friend of a vet who was recently before the Disciplinary Committee in respect of matters relevant to this item, namely veterinary surgeons relying on attestations by lay people.
3. The minutes from the meeting of 16 April 2024 were agreed.

## Matters for decision

### AI 2 (a) Letters of non-objection

4. The Committee were provided with the background for this item, as follows – the Veterinary Surgeons Act 1966 makes it an offence for a person not registered on the RCVS register to take or use the titles ‘vet’, ‘veterinary’, ‘veterinary surgeon’, or ‘veterinary practitioner’ to imply they are registered. As such, these titles are considered sensitive words for the purposes of company incorporation at Companies House. Companies House refer to this as ‘protection of title’. A person or entity wishing to incorporate a business/practice as a Limited Company or a Public Liability Company at Companies House with a company name that includes one of these sensitive words will first need a letter of non-objection (LONO) from the RCVS. Note that trading names/unincorporated names do not go through this same process. Requests for LONOs are dealt with by the Standards and Advice team, which follows a long-established administrative process which considers only whether to provide a LONO or object to the request based on standard objections.
  
5. Several issues have arisen in relation to the LONO request process, the standard objections, and ancillary matters concerning the advertising of practice names (i.e., trading names/unincorporated names) more broadly, all of which prompted a review. The paper represents phase 1 of the review on LONOs, with the Committee being asked to consider and discuss the issues and agree to the proposed solutions/recommendations. It is intended that phase 2 will be considered at the Committee’s next meeting which will include proposed amendments to the supporting guidance if the Committee agrees that amendments are required as part of this phase 1.
  
6. The Committee made the following general comments:
  - a) Although RCVS jurisdiction regarding incorporated company names only extends to the use of the title ‘vet’, ‘veterinary’, ‘veterinary surgeon’, or ‘veterinary practitioner’, the Code and Chapter 23 of the supporting guidance around advertising provides a basis for the RCVS to provide advice to those with trading names/unincorporated names which may be misleading.
  - b) To prevent RVNs from using the sensitive words when incorporating their companies may appear to limit their roles at a time when the RCVS is encouraging them to explore what they can do within their remit.
  - c) To help the profession in reporting misleading or unsuitable business names, the current references in the supporting guidance to raising a concern with the Advertising Standards Authority (where laypeople misuse the title ‘vet’, ‘veterinary’, ‘veterinary surgeon’, or ‘veterinary practitioner’) could be made more prominent.
  - d) Guidance on the LONO process should be provided to veterinary professionals at the earliest stages of the process of setting up their business, such as when registering as an RVPP or becoming a member of PSS. It was clarified that the LONO process has been flagged with

the Registration Department which has added guidance on the RVPP page of the website, and with PSS so that they can direct veterinary professionals to the relevant guidance.

- e) Future changes to the Veterinary Surgeons Act, as well as any expansion of the RVN role, should be kept in mind as the RCVS' role around company names may change.
  - f) Inclusion of clear guidance will mean that the process is streamlined for the team, as well as providing transparency to the profession.
7. The Committee therefore agreed that the supporting guidance should be updated to include information on inclusion of sensitive words when incorporating a company, ensuring that the guidance only extends to where the RCVS has the power to object, with links included to the existing guidance around advertising. The new guidance should also be referenced in the Registration and PSS areas of the website to ensure a consistent approach across the College.

**Action: Standards and Advice Team (KR)**

## AI 2 (b) Consumer choice and professional autonomy follow up

8. The Committee was reminded of the background for this item, along with an update on three action points which arose from the April meeting:
- a. Existing guidance regarding consumer choice and obligations under consumer law has been consolidated into Chapter 10 of the supporting guidance and signposted to in the relevant chapters of the guidance.
  - b. Chapter 2 of the guidance has been updated to clarify the position on contextualised care and address situations where vets may feel under pressure to treat animals in a particular way under their practice policy.
  - c. Chapter 17 of the guidance has been updated to require vet practices to have a senior appointed vet surgeon who ensures that the practice is compliant with consumer law, signposting to the guidance in Chapter 10.
- In response to the Committee's query from the April meeting regarding whether the senior appointed veterinary surgeon of PSS practices could be recorded in some way, the PSS team have confirmed that following would be possible, and the detail of the options can be found in the paper at para 6.
9. The Committee provided the following feedback:
- a. The primary purpose of collating the existing guidance in one place is to make the obligations more accessible and easier to navigate for the professions. It will also no doubt be of assistance to the CMA for all of the relevant guidance to be in one place.
  - b. While many vet practices are members of PSS, separate processes will need to be considered for recording the senior appointed vet surgeon for those practices which are not members.

- c. In Chapter 10, some of the supporting guidance could be viewed as repetitive, however it was acknowledged that this is because it is a consolidation of other guidance throughout all chapters. Once the CMA review is complete, a more substantial review of the guidance in this area can commence.
  - d. The new guidance in Chapter 2 should hyperlink to the information on contextualised care provided by the RCVS Knowledge.
  - e. Where there is guidance regarding consent and considering treatment options, an option could be added to monitor the animal and reassess after a period of time.
  - f. The inclusion of reference to freedom of choice in paragraph 10.1 may lead to the whole chapter being interpreted as only being in relation to freedom of choice, detracting from the broader principles around general good practice.
  - g. A requirement for practices to display prices and fees on their website was discussed however it was acknowledged that the supporting guidance is not the appropriate place to create obligations for practices
  - h. The additional considerations in the guidance may result in consultations being longer and vet fees increasing for clients a result.
  - i. Paragraph 10.3(a) should be amended to clarify that clients have the options of fulfilling the prescription at the practice or obtaining a written prescription to have it fulfilled elsewhere, e.g., “...ensure clients can obtain prescriptions either by dispensing at the practice, or if to be dispensed elsewhere, via written prescription.”
  - j. Some of the guidance seems directed at small animal practices only and may cause difficulties for farm and equine vets who may not have a computer available meaning that they can only give a ballpark estimate to clients initially. Therefore, it could be added that the precision of estimate is linked to the resources available and that it is acceptable to provide a more accurate estimate shortly after.
  - k. It was agreed that bringing together the relevant guidance in one place is useful, however the comms around the introduction of Chapter 10 should be carefully considered to reassure the profession that there is no new guidance.
10. It was agreed that the Committee would flag via email any parts of the guidance that they consider unclear by 19<sup>th</sup> June, before a clean copy of the amended guidance is circulated to the Committee for approval.

**Action: Committee**

11. It was agreed that the guidance would be summarised clearly when communicated to the profession and that the CMA would be made aware of the amendments.

**Action: Head of Legal Services (Standards)**

### AI 2 (c) Defra Trusted Traders - confidential

12. The minutes of this agenda item discussion can be found in the classified appendix at paragraphs 1-11.

### AI 2 (d) VMR update – confidential

13. The minutes of this agenda item discussion can be found in the classified appendix at paragraphs 12-16.

### Matters for discussion

#### AI 3(a) Vet attestation audit update – Defra – confidential

14. The minutes of this agenda item discussion can be found in the classified appendix at paragraphs 17-20.

#### AI 3 (b) FSA update re TRNOVs – confidential

15. The minutes of this agenda item discussion can be found in the classified appendix at paragraphs 21-23.

### Matters for report

#### AI 4 (a) Disciplinary Committee Report

16. The report was noted.

#### AI 4 (b) Riding Establishments Subcommittee Report

17. The Committee thanked Riding Establishments Subcommittee Member Bertie Ellis for his extensive contribution to the Subcommittee.

#### AI 4 (c) PSS Report

18. It was explained that the review of PSS standards happens on a five-yearly cycle, and is currently underway for 2025, with 6 groups looking at the various standards and assessment processes. The standards are also being updated to align with the updated VMRs, and the PSS team is liaising with the Standards and Advice team on this.
19. The percentage of practices with PSS membership has stayed relatively static despite an increase in RVPPs, at 67% down from 69% despite 31 new joiners. It was noted that the loss of practices may be because those that were not meeting Core standards, and/or because the practices were shut down.
20. In terms of the PSS modules, it was noted that while many reviews have been carried out on specific issues, there had not been an opportunity to look at the standards afresh and as a whole.

It was clarified however that a full review of the methodology of the assessment process was being carried out and that the findings of this would be presented to Standards Committee.

**Action: Head of Legal Services (PSS)**

**Confidential matters for report**

**AI 5 (a) Routine Veterinary Practice Subcommittee Report**

21. The report was noted.

**AI 5 (b) Ethics Review Panel Report**

22. The report was noted.

**AI 5 (c) Certification Subcommittee Report**

23. The report was noted.

**Risk and equality**

**AI 6 (a) CMA, Specialist guidance, wildlife euthanasia advice**

24. The minutes of this agenda item discussion can be found in the classified appendix at paragraphs 27-29.

**AI 7 Any other business and date of next meeting on 24 September 2024 (in-person)**

25. The Committee queried why Standards Committee papers are additionally sent out via password-protected email to all RCVS Council members as well as the Committee via BoardEffect, whereas the papers for other Committees are not sent to Council directly. It was explained that this was a historic decision due to the nature of the issues which Standards Committee discusses, however, Council will be asked which bundles they would like to receive directly in the future.

**Action: CEO**

26. The Head of Legal Services (Standards) thanked the Standards and Advice team for the minutes and for all their work with the updated VMRs and the CMA projects alongside business as usual.

27. The Committee noted that it was the Registrar's last meeting before retirement and thanked her for work with the Committee.

28. The Committee noted that it was MDs last meeting before retirement from RCVS Council and thanked her for her tenure on the Committee.

29. The date of the next meeting on 24 September 2024, to be held in-person, was noted.



## Table of actions - unclassified

<b>Paragraph</b>	<b>Task</b>	<b>Responsibility</b>
<b>7</b>	Update supporting guidance to include information on inclusion of sensitive words when incorporating a company.	<b>Standards and Advisory Team (KR)</b>
<b>10</b>	Committee to send comments on Chapter 10.	<b>Committee</b>
<b>11</b>	Communication with the profession on publication of Chapter 10.	<b>Head of Legal Services (Standards)</b>
<b>20</b>	Present findings of review of the assessment process to the Committee.	<b>Head of Legal Services (PSS)</b>
<b>25</b>	Ask Council which bundles to be received via email.	<b>CEO</b>