

## Response ID ANON-WKN2-99T2-T

Submitted to Consultation: Reform of the Veterinary Surgeons Act 1966  
Submitted on 2026-03-24 15:42:30

Ministerial foreword

CVOs foreword

Executive Summary

Consultation information: Have your say

Would you like your response to be confidential?

No

If you answered Yes to this question, please give your reason(s):

Please provide your name and email address

Name:

James Legge

Email address:

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Where are you based?

England

If outside the UK, please specify:

Are you responding on behalf of a business or organisation?

Yes – responding on behalf of a business or organisation

If you are responding on behalf of a business or organisation, which category of business or organisation are you representing?

Charity

If selected other, please specify:

If you are responding on behalf of a business or organisation, what is the name of that business or organisation you are representing?

Please type the organisation name:

Countryside Alliance

Are you a veterinary professional or do you professionally work with animals?

No, I do not professionally work with animals

If you are a veterinary professional or work in an animal-related profession, please specify your role.

Not Answered

If selected other, please specify:

Which of the following best describes your gender?

Not Answered

What is your age group?

Not Answered

Which of the following best describes your ethnicity?

Asian/British Asian:

Black/African/Caribbean/Black British:

Mixed / multiple ethnic groups:

White:

Other ethnic group:

Not Answered

Which of the following best describes your sexual orientation?

Not Answered

Do you consider yourself, or anyone in your household, to be disabled?

Not Answered

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Licence to Practise: How These Proposals Achieve Stated Objectives

Licence to Practise: Question 1

Veterinary acts can only be carried out by those who have an appropriate licence to undertake them (or have an exemption). A veterinary surgeon with a full licence to practise will be allowed to undertake all veterinary acts. Veterinary nurses and allied veterinary professionals will be able to undertake some veterinary acts, as determined by the regulator. Which of the following do you think should be considered as veterinary acts:

Diagnosis of diseases in, and injuries to, animals, Carrying out tests on animals for diagnostic purposes, Giving advice based upon a diagnosis, Signing of official certification, Medical treatment of animals, Performance of surgical operations on animals

Licence to Practise: Question 2

To what extent do you agree or disagree with the following statement: Only individuals with a valid appropriate licence to practise (or those that have an exemption order to undertake specific acts) should be allowed to perform veterinary acts, as detailed in the chapter above?

Strongly agree

Licence to Practise: Question 3

Which, if any, penalties should be imposed on anyone who performs veterinary acts without a valid licence to practise those specific acts?

Fines and financial penalties, Revocation of licence, Suspension of licence, Legal actions that could result in criminal convictions - depending on the severity of the infringement, Professional disqualification - preventing individuals from practising in the veterinary field in the future, Reputation damage by publicly announcing the penalty faced by the individual, Other penalty

If selected "other penalty", please specify:

We would support the full range of sanctions being available but penalties applied should be case specific and proportionate to any harm caused. Clearly minor breaches or those of a technical nature, or where action was taken due to immediate necessity should be accounted for. The process leading to penalties should be open and fair and allow for appeal.

Licence to Practise: Question 4

How appropriate is the use of the Animal Welfare (Sentience) Act 2022 to define which species are covered under veterinary care?

Somewhat appropriate

#### Licence to Practise: Question 4b

If you responded "inappropriate" or "very inappropriate", please provide details of why you find it inappropriate for the definition of animals to be the same as the Animal Welfare (Sentience) Act 2022.

Please answer the question in this text box:

Not Answered

#### Licence to Practise: Question 5

The video you have seen shows the process for veterinary surgeons, veterinary nurses and allied veterinary professionals to gain a licence to practise. How confident are you that this ensures professionals are fully qualified, are proficient in English and have not committed serious crimes?

Fairly confident

#### Licence to Practise: Question 6

Currently, registered veterinary nurses can only carry out veterinary tasks if they are delegated from a veterinary surgeon employed by the same business. Should registered veterinary nurses be able to carry out specific roles, such as district nursing, without direct delegation from a veterinary surgeon?

Yes, should probably carry out

#### Licence to Practise: Question 7

To what extent do you agree or disagree with the proposal to expand regulation to include allied professionals, for example, Equine Dental Technicians, Behaviourists, musculoskeletal professionals?

Tend to agree

Please explain your answer:

It seems logical that those who work with and treat animals in whatever capacity should be subject to oversight. This would ensure those practitioners are suitably qualified, operate according to best practice and do not cause harm. It would also provide confidence to owners of animals and should allow for redress in cases of malpractice.

#### Licence to Practise: Question 8

To what extent is it important, or not, for the professional titles of veterinary nurses and allied veterinary professionals be legally protected?

Very important

#### Licence to Practise: Question 9

To what extent do you agree or disagree that farriers should be incorporated into the VSA with the allied veterinary professionals?

Neither agree nor disagree

#### Licence to Practise: Question 9b

If you answered "neither agree nor disagree", "tend to disagree", or "strongly disagree", please explain your answer

Please answer the question in this text box:

The case for inclusion of farriers seems to rest on the fact that they are currently unregulated in Northern Ireland. We do not think this alone is sufficient justification for replacing the existing regulation of farriers elsewhere in the UK. They are already a statutorily regulated profession. As the Worshipful Company of Farriers has noted, any inclusion of farriers within the reform should be clearly beneficial, proportionate, and appropriate, recognising the working practices of farriers as largely self-employed, mobile practitioners. We share the concerns expressed by the Company about the lack of detail in the proposals, particularly regarding licensing, costs, and governance and are not sure that imposing regulatory models designed for larger veterinary businesses onto sole traders is either necessary or helpful. We would urge the government to work closely with the farrier sector so that any reform is proportionate, workable and evidence-based and which will improve animal welfare without unnecessary regulatory burden. We do not believe that the consultation document contains the detail that would be needed to take a final position.

## Licence to Practise: Question 10

Do you think that equine barefoot trimmers should, or should not be regulated?

Yes, should probably be regulated

## Licence to Practise: Question 11

Do you have any comments you wish to make on the Licence to Practise proposals?

Please answer the question in this text box:

With regard to Question 10 and barefoot trimming, it is unclear whether regulation would only apply to those in the business of trimming, or whether trimming would be included in such a way that it could not be done by owners of horses. The ability of private individuals to trim is a matter of horse welfare. For example if a hoof is cracked it may need immediate attention to prevent it spreading. Similarly if a horse throws a shoe or it becomes partially detached then again it may be necessary to trim the hoof to prevent more serious problems or damage. It is not always possible to get a farrier out quickly enough. If foot trimming is to be included in some way in any reform, then it must account for the types of instances above otherwise it will have negative consequences for horse welfare.

Not Answered

## Next Steps

Fitness to Practise: Introduction

Fitness to Practise: Current Process

Fitness to Practise: Proposal

Fitness to Practise: Process

Fitness to Practise: Serious Offences and Interim Orders

Fitness to Practise: Review of Sanctions and Appeals

Fitness to Practise: Removal of Licence to Practise

Fitness to Practise: Video

Fitness to Practise: How these proposals achieve stated objectives

Fitness to Practise: Question 1

Thinking of the process you have just read about and/or the video you have watched. To what extent do you agree, or disagree, that the proposed overall Fitness to Practise process is appropriate?

Tend to agree

Fitness to Practise: Question 1b

Please provide reasons for your answer.

Please answer the question in this text box:

The Countryside Alliance is not expert in the regulation of professions. However, the process outlined seems reasonable from a layperson's perspective.

Not Answered

Fitness to Practise: Question 2

Thinking about someone in the veterinary team who is found to have a current impairment. Which, if any, of the following sanctions should be considered at the tribunal stage?

Undertakings (a formal promise regarding the actions that the professional has to do (or what they have to stop doing) for example, undergoing a course of professional development), Conditions on their licence (such as not to carry out specific work, or to work under supervision), Suspension of their licence, Removal of their licence, Other sanction

If selected other sanction, please specify:

We would suggest that as with penalties, the full range of options should be available. Which sanctions are applied will clearly depend on the seriousness of the current impairment under consideration. What matters is that the sanction applied is fair and proportionate and follows an open and transparent process and any appeal.

### Fitness to Practise: Question 3

If a veterinary professional had their licence to practise removed by the regulator, how long do you think the minimum period should be before allowing them to apply for their licence to be restored, if at all?

Depends on the reason for the removal

### Fitness to Practise: Question 4

In a situation where a veterinary professional is alleged to have a current impairment of their competency to practise (including for health reasons such as disability, substance abuse/addiction, chronic illness), what, if any, information should the regulator be allowed to access?

An independent assessment report on the professional's performance with relevant health information in relation to the individual's ability to carry out their duties., A letter from their doctor(s) containing relevant health information and/or assessment of their ability to work.

If selected other, please specify:

We would suggest that a letter/report from their GP would ensure an overview of the professional's medical records as relevant to the case without the risk of access to unrelated private medical information. There is a balance to be struck between the confidentiality of a person's medical records and ensuring the regulator has the information necessary to make a fair assessment of the case.

### Fitness to Practise: Question 5

Do you have any further comments you wish to make on the fitness to practise proposals?

Please answer the question in this text box:

No comment

### Next Steps

Regulation of Veterinary/Animal Healthcare Businesses: Introduction

Regulation of Veterinary/Animal Healthcare Businesses: Current Process

Regulation of Veterinary/Animal Healthcare Businesses: Proposal

Regulation of Veterinary/Animal Healthcare Businesses: Definition of Veterinary/Animal Healthcare Businesses

Regulation of Veterinary/Animal Healthcare Businesses: Standards

Regulation of Veterinary/Animal Healthcare Businesses: Licensing Process

Regulation of Veterinary/Animal Healthcare Businesses: Responsibility

Regulation of Veterinary/Animal Healthcare Businesses: Reporting Requirements for Businesses and Inspection Process

Regulation of Veterinary/Animal Healthcare Businesses: Regulator Powers

Regulation of Veterinary/Animal Healthcare Businesses: Inspection Results

Regulation of Veterinary/Animal Healthcare Businesses: Other Recommendations

Regulation of Veterinary/Animal Healthcare Businesses: Complaints about Veterinary/Animal Healthcare Businesses and Premises

Regulation of Veterinary/Animal Healthcare Businesses: How These Proposals Achieve Stated Objectives

Regulation of Veterinary/Animal Healthcare Businesses: Question 1

Which, if any, of the following Veterinary/Animal Healthcare businesses should be regulated under proposed new legislation?

All veterinary/Animal Healthcare Businesses

If selected other, please specify:

### Regulation of Veterinary/Animal Healthcare Businesses: Question 2

Thinking about a scenario of a veterinary/animal healthcare business that has multiple premises/locations (i.e. different branches) across a number of different geographic locations. Which of the options below should a named responsible person be responsible for?

b) Each premises/location AND also an addition person for the overall central business if part of a large veterinary group

If selected "d", please elaborate:

### Regulation of Veterinary/Animal Healthcare Businesses: Question 3

Which, if any, of the following should be assessed by the regulator?

The health and safety policies, Animal welfare policies, Staff welfare policies, Qualifications of the regulated professional, Training of the regulated professional, Record keeping to professional and legal requirements, Management, storage and usage of medicines, Leadership of the practice, Working environment including equipment and facilities, Treatment of consumer/customers, Visible information about prices, Participation with an external mediation/adjudication service

### Regulation of Veterinary/Animal Healthcare Businesses: Question 4

A veterinary/animal healthcare business would need to have a licence from the regulator before they open a premises. Which, if any, of the following do you think the premises must have in place before the licence is issued?

Declaration from the business that it meets the requirements of a licence, Named responsible person at the premises, Named responsible person at business level (if the premises is part of a larger group), Inspection by the regulator of the premises (or documentation for those without a physical location), Inspection of premises based on risk

If selected "something else", please specify:

### Regulation of Veterinary/Animal Healthcare Businesses: Question 5

If the regulator is concerned about a veterinary/animal healthcare business, which if any of the following situations do you think the regulator should have powers of entry to inspect the practice?

Powers of entry for routine inspections for business/practice premises, Powers of entry for spot inspections for business/practice premises, Powers of entry for risk-based spot inspections for business/practice premises, Warranted powers of entry (from the police) for private dwellings

If selected "powers of entry for another situation", please specify your reasoning:

### Regulation of Veterinary/Animal Healthcare Businesses: Question 6

Which, if any, of the following sanctions and actions do you think the regulator should impose for non-compliance of the veterinary/animal healthcare business requirements?

Charge a business owner with a criminal offence if the business is operating without a licence, Provide guidance and advice on improvements, Impose fines based upon the non-compliances and how critical they are, Issue an "improvement notice" of work that must take place with a timeframe set by the regulator based on severity and risk, Suspend the practice licence, Suspend the business licence (i.e. all premises within the business), Issue an "immediate stop notice" for the premises to stop work on specific activities, Permanent removal of the licence, Other sanction/actions

If selected other, please specify:

As noted previously, a full range of sanctions should be available but any sanction should be proportionate to any breach of the regulations and any harm cause. Sanctions must only be applied after a fair and transparent process and subject to appeal.

### Regulation of Veterinary/Animal Healthcare Businesses: Question 7

Do you have any comments you wish to make about the proposed regulation of veterinary/animal healthcare businesses?

Please answer the question in this text box:

One of our greatest concerns, which is reflected in press reports and the reports of the Competitions and Markets Authority, is that the fact that over 60% of veterinary practice's are now owned by a handful of large veterinary businesses and that many veterinarians are faced with meeting targets in terms of profits and selling additional services to clients. It is imperative that veterinary practitioners, whether surgeons or nurses etc, are not put under pressure to achieve commercial targets and decisions around treatment are only be based on the clinical need and the best interests of the animal and its owner. We would note here the report of the Competition and Markets Authority published on 24 March 2026.

Not Answered

Next Steps

Governance: Introduction

Governance: Current Process

Governance: Proposal

Governance: Scope

Governance: Powers

Governance: Decision Making

Governance: Funding

Governance: Appointments, Setting Direction, and Accountability

Governance: Statutory Appeals

Governance: Post Nominals

Governance: Proposed Structure

Governance: Alternative Structure

Governance: How These Proposals Achieve Stated Objectives

Governance: Question 1

Which of the two illustrative options do you believe would most effectively serve the veterinary sector in the future?

Don't know

Governance: Question 2

What, if any, benefits do you believe maintaining a single body, including regulator and professional leadership factions, would bring to the veterinary profession?

Don't know

If selected other benefits, please specify:

What, if any, benefits do you believe a proposed Split Model with a separate new professional leadership body would bring to the veterinary profession?

Don't know

If selected other benefits, please specify:

Governance: Question 3

Do you believe there are any risks with a single body having both regulator and professional leadership functions?

Please answer the question in this text box:

Not Answered

If you have identified risks in the question above, how could they be mitigated against?

Please answer the question in this text box:

Not Answered

#### Governance: Question 4

Do you believe there are any risks with the proposed Split Model with a separate new professional leadership body?

Please answer the question in this text box:

Not Answered

If you have identified risks in the question above, how could they be mitigated?

Please answer the question in this text box:

Not Answered

#### Governance: Question 5

To what extent are each of the following important, or not, as primary objectives of the regulator to ensure effective regulation?

Gov Q5 - Protecting animal health and welfare:

Very important

Gov Q5 - Promoting public confidence:

Very important

Gov Q5 - Maintaining professional standards:

Very important

Gov Q5 - Protecting consumers:

Very important

Gov Q5 - Ensuring fair competition:

Very important

#### Governance: Question 6

To what extent is a professional leadership body important?

Very important

#### Governance: Question 7

Which, if any of the following, do you consider to be the primary functions of a professional leadership body?

Establish specialist-specific standards above the mandatory level for specialisms, Profession-specific guides on activities and conduct, based on the overarching codes of conduct set by committees, Professional leadership, driving their profession to be the best it can be, Educating the public on care for animals and how to interact with the profession

If selected other function, please specify:

#### Governance: Question 8

Which of the following, if any, should be prioritised when appointing individuals to Boards and Committees of the regulator?

Area(s) of expertise (for example, public health, equine, small animal), Regulatory or educational experience, Professional background (Veterinary Surgeon, Registered Veterinary Nurse, Allied Veterinary Professional), Spectrum of skills

If selected other, please specify:

#### Governance: Question 9

To what extent is independent oversight of the regulator important or not in relation to the following aspects?

Gov Q9 - Appointment processes for the Board:

Very important

Gov Q9 - Fitness to practise cases:

Very important

Gov Q9 - Overall performance:

Very important

## Governance: Question 10

The regulator is responsible for setting fees for veterinary professionals' licences. Which, if any, of the following aspects related to fee setting for veterinary professionals' licences should the regulator consult on?

Fee levels: the proposed fee amounts to ensure they are fair and justified, Economic impact: to gather feedback on how the proposed fees might affect veterinary businesses financially, Service feedback: to ask for opinions on the quality and scope of the services that the fees will support, Cost allocations and priorities: to engage veterinary professionals on how funds from fees should be used for different regulatory activities, Regulatory changes and requirements: to update and consult on any legal or procedural changes impacting fees and licensing, Stakeholder needs and expectations: to understand the needs and expectations of veterinary professionals regarding regulatory practices

If selected other, please specify:

## Governance: Question 11

How important, or not, is it for veterinary professionals to have post-nominals (as well as a licensing number from the regulator)?

Very important

## Governance: Question 12

Which approach to post-nominals do you prefer for veterinary professionals?

Don't know

If selected other, please specify:

## Governance: Question 13

Which part of His Majesty's Courts and Tribunals Service should hear statutory appeals: a regulatory tribunal (such as the First-tier Tribunal) or the High Court?

Regulatory tribunal

If selected other, please specify:

## Governance: Question 14

Should appeals be on a full merits basis (decided on the facts and merits of the entire case, not just on a specific point of law), on points of law only, or a combination?

A combination of the above

## Governance: Question 15

Do you have any comments you wish to make about governance?

Please answer the question in this text box:

No comment

## Next Steps

Annex: Duties and Powers

Annex: Appeals

Annex: Glossary

Final Questions

Do you agree or disagree with the proposed reform of the Veterinary Surgeons Act 1966, and why?

Agree

Please explain your answer:

It is clearly imperative, given the changes in veterinary practise in the last 60 years to update the regulatory framework. It makes no sense to regulate individual veterinary surgeons when over 60% of of practices are now owned by veterinary businesses. Similarly, there is a need to regulate associated veterinary professionals and given them proper recognition, such as nurses, and those who run businesses involving the treatment of animals such as alternative therapies. It is important, not just to ensure the highest standards of animal welfare and the well-being of those working in the industry, but also to ensure an open, fair and transparent market fair services that animal owners can trust. We would note again the report of the Competitions and Markets Authority published 24 March 2026.

Do you have any additional points to raise regarding the proposals that you have not yet had the chance to express in this consultation?

Add additional points here:

No additional comments

Do you think that the proposed reform of the Veterinary Surgeons Act 1966 will discriminate against or benefit those with protected characteristics?

Please write in the box below:

No comment

### Consultee Feedback on the Online Survey

Overall, how satisfied are you with our online consultation tool?

Satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it.:

No comment