

Lantra: Consultation on National Occupational Standards for Equine Dental Technicians

1. The following response is made on behalf of the Royal College of Veterinary Surgeons (RCVS). The RCVS is the regulatory body for veterinary surgeons in the UK. The role of the RCVS is to safeguard the health and welfare of animals committed to veterinary care through the regulation of the educational, ethical and clinical standards of veterinary surgeons and nurses, thereby protecting the interests of those dependent on animals, and assuring public health. It also acts as an impartial source of informed opinion on relevant veterinary matters.

Legal Position

2. All diagnostic procedures and treatments within a horse's mouth, with the exception of manual removal of dental overgrowths by hand instruments and certain other minor procedures, are considered by the RCVS to amount to the practice of veterinary surgery and are therefore legally restricted by the Veterinary Surgeons Act (VSA) to be carried out only by veterinary surgeons.

Lantra NOS

3. In general terms the RCVS supports the Lantra project to develop NOS for EDTs on the basis that the project has brought together the various stakeholders to agree appropriate standards for those working in this field. By developing such standards, the project has helped to prepare the ground for the development of an exemption order under the VSA that would provide a legal basis for appropriately trained persons, other than veterinary surgeons, to carry out specified aspects of equine dental work.
4. The RCVS is strongly supportive of the fact that the proposed NOS use the system of categories of procedure that was developed by the British Equine Veterinary Association (BEVA) and the British Veterinary Dental Association (BVDA), and was accepted by the RCVS. This system of categorisation clarifies that there are some procedures that any person may carry out (Category 1) and some procedures that may be carried out by trained equine dental technicians (EDTs) (Category 2). Since the development of the categorisation system the RCVS has agreed that Category 1 and Category 2 procedures could be carried out by suitably trained and regulated persons other than veterinary surgeons and therefore could potentially be covered by NOS. In the interests of protecting the health and welfare of animals all other procedures (Category 3) should only be carried out by veterinary surgeons.

Going forward

5. In June 2001, the Preliminary Investigation Committee (PIC) of the RCVS advised that it could not determine any public interest in taking action against veterinary surgeons who worked in conjunction with EDTs, provided that a number of 'conditions' were met and that EDTs were appropriately trained and were only undertaking Category 1 and Category 2 procedures, and that they were not undertaking Category 3 procedures, which are only for veterinary surgeons.
6. The PIC advice, however, was only envisaged as a temporary solution and was originally developed at a point when it was believed that an exemption order would be introduced in the

near future. So far that exemption order has not been laid. As a regulatory body the RCVS could not endorse the formalisation of NOS for EDTs that incorporated Category 2 procedures unless there was an accompanying exemption order that allowed non-veterinary surgeons legally to undertake such activities. The RCVS therefore requests that the NOS remain as draft standards until such stage as an exemption order covering Category 2 procedures is laid before Parliament, which would ensure that those undertaking these aspects of equine dental work were not acting illegally.

7. If clarification on the above comments is required, please do not hesitate to contact the College. Representatives from the RCVS would be happy to meet with officials to discuss and expand upon this evidence.

RCVS
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