

Proposed new Registration Regulations

Following discussions in the February and May meetings of the RCVS Planning and Resources Committee, in June RCVS Council agreed a set of proposed new Registration Regulations to update our registration procedures. The full proposals, which, if approved by the Privy Council, will apply from January 2011, may be read online at www.rcvs.org.uk/council. We will communicate with the profession about the new changes in plenty of time, and allow extended time for compliance in the first year.

The key changes are as follows:

1. **Registration of work address:** UK-practising veterinary surgeons will be required to register their practice or principal work address, rather than either their practice or home address, as at present. This change will make it easier for veterinary surgeons to comply with the Provision of Services Regulations 2009, which came into force in December 2009^[1], under which it is the responsibility of individual veterinary surgeons to ensure the address of their place of work is registered with us. It is not possible to cross-reference with the *Directory of Veterinary Practices* as such data is gathered on a voluntary basis. The Register of Veterinary Practice Premises only requires a practice address, not a list of the veterinary surgeons working there.

Vets may apply to the Registrar to approve the registration of an alternative address, as it is understood that for locums and others it may not be feasible to provide a permanent work address. The original proposed wording which stated that this could only be done in 'exceptional circumstances' was removed in the Council meeting. In such cases, a home address would be considered. It will also be possible for an alternative mailing address to be set up to receive correspondence from the College.

2. **Annual renewal:** It has always been necessary for registration to be renewed each year. Under the proposals, vets will be required to confirm their registered address when they renew their registration each year.

A requirement for members to notify change of name or address details within 28 days is included in the existing Registration Regulations and, under the Veterinary Surgeons Act, members can be removed from the Register if they have not responded within six months to a request for confirmation of details from the Registrar. The new proposal serves to highlight the requirement and will allow us to ask for an annual declaration of registration details.

Under the proposals, all efforts will be made to communicate with the individual but if no response is received within six months, the member's name will be removed from the Register, even if a fee has been paid, as we have some examples of direct debit arrangements which continue even when the member's circumstances change. If the proposals are approved, this will mean that we can remove someone from the Register following a Disciplinary Case, for non-payment, for not completing their annual declaration, if they have ceased to practise and voluntarily removed themselves, or if they have died.

^[1] See paragraph 5c of the regulations, which implement EU Directive 2006/123/EC

A similar annual renewal process exists for the majority of the other professional regulatory bodies – such as the Nursing and Midwifery Council, the Law Society and The Institute of Chartered Accountants. It is vital that a published register of professionals is up to date, and it is in the public interest that bodies regulating professions have a valid mechanism for communicating with their registrants. It is also a requirement under data protection legislation that information held about an individual is current.

The veterinary profession is a relatively nomadic one: we currently process just under 10,000 data changes each year, out of a membership of nearly 24,000. Returns from mailings would indicate that about 1,000 members are currently registered with an out-of-date address. We also have around 150 members for whom we do not have a valid address at all – they remain on the Register c/o the RCVS. A professional Register is a tool to help regulate a profession. As a statutory and public Register, it is worthless if it's not up-to-date. We need to be in a position to keep our members updated on changes to guidance and the law, follow up on complaints, ensure that members are correctly practising or non-practising according to the declaration they signed and, under EU law, know where people are working.

We are currently processing removals from the Register for non-payment, of which approximately 230 are home-practising members, many of whom had not received their retention fee notices because they had not notified us of a change of address. However, the number of removals for non-payments has decreased since we introduced an increased restoration fee for those who did not remove themselves voluntarily. We hope that the further tightening of the rules will act to remind veterinary surgeons that it is their responsibility to maintain their records.

For most vets, this confirmation will mean ticking a box on the annual declaration form or updating their details online on our new website, to be launched towards the end of the year. We carried out a voluntary data-check this year and returns were good, highlighting that, for the majority, this will not be a difficult regulation with which to comply.

3. **Annual continuing professional development (CPD) declaration:** Again, in line with the requirements of the majority of professional regulatory bodies, the new proposals require an annual declaration of how many hours of CPD has been completed. It is unlikely that full CPD Record Cards will be required in the first instance, just confirmation about how much CPD has been undertaken.
4. **Early/late payment fees:** We propose to introduce a split fee-level. Those paying by the due date - 31 March - will pay the regular fee, but those paying after the due date will pay a higher amount. The majority of veterinary surgeons make their payment well before the deadline.
5. **Refunds/payments:** When members leave or rejoin the Register part-way through a year, we currently use quarter-years to calculate the retention fee owing or refundable. We plan to move to using half-years. Unlike the regulators of most professions, we will continue to pay refunds for members who choose to remove themselves from the Register or make non-practising declarations.
6. **Postgraduate discounts:** Currently, veterinary surgeons enrolled on a full-time postgraduate course pay a reduced retention fee, primarily so that they can work legally at weekends and during holidays. The nature of postgraduate education has changed, as have working patterns and concomitant potential earnings, and this situation has become inequitable. We propose therefore to remove the fee-reduction associated with postgraduate courses.