

Standards Committee

Agenda for the meeting to be held on 13 September 2021 at 10.00am

1.	Apologies for absence, declarations of interest and minutes of the meetings held on 10 May, 16 July, 4 August.	Oral, minutes attached
2.	Standards and Advice update	Oral update
3.	Matters for discussion	
	a. Under care – <u>confidential</u>	Paper attached
	b. GEFS review update – <u>confidential</u>	Paper attached
4.	Matters for decision	
	a. Endorsements - <u>confidential</u>	Paper attached
	b. PSS appeals - <u>confidential</u>	Paper attached
	c. Conscientious objectors - <u>confidential</u>	Paper attached
	d. Pet importation consultation	Paper attached
	e. Vet-AI proposal - <u>confidential</u>	Paper attached
5.	Matters for report	
	a. Disciplinary Committee Report	Paper attached
	b. Practice Standards Scheme Report	Paper attached
6.	Confidential matters for report	
	a. Recognised Veterinary Practice Subcommittee Report	Paper attached
	b. Ethics Review Panel Report	Paper attached
	c. Certification Subcommittee Report	Paper attached
	d. Riding Establishments Subcommittee Report	Paper attached
7.	Risk and equality	Oral update
8.	Any other business and date of next meeting 15 November 2021	Oral update

Standards Committee 2021/2022

Chair:

Dr Melissa Donald BVMS MRCVS

Members:

Dr Louise Allum VetMB MRCVS

Ms Belinda Andrews-Jones DipAVN (surgical) RVN

Miss Linda Belton BVSc MRCVS

Mr Mark Castle OBE

Dr Danny Chambers BVSc MRCVS

Dr Matshidiso Gardiner MRCVS

Ms Claire-Louise McLaughlan MA LLB(Hons)

Prof Tim Parkin BVSc FRCVS

Mrs Claire Roberts DipAVN (surgical) RVN

Summary

Meeting	Standards Committee
Date	10 May 2021
Title	Standards Committee Minutes
Summary	Minutes of Standards Committee held remotely on Monday, 10 May 2021, at 10am
Decisions required	None
Attachments	Classified appendix
Author	Stephanie Bruce-Smith Senior Standards and Advice Officer s.bruce-smith@rcvs.org.uk / 0207 202 0754

Classifications

Document	Classification ¹	Rationales ²
Paper	Unclassified	n/a
Classified appendix	Confidential	1, 2 and 3

1Classifications explained

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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

Minutes of the Standards Committee Meeting held remotely on Monday, 10 May 2021, at 10am

Members: Mr M Castle
Mrs C Roberts
Dr M A Donald Chair
Mr D Leicester
Ms C-L McLaughlan
Mr M Peaty
Ms B Andrews-Jones
Miss L Belton
Dr C Allen
Prof J Wood

In attendance: Ms E C Ferguson Registrar
Mrs G Kingswell Head of Legal Services (Standards)
Mrs L Price Head of Legal Services (Practice Standards)/Solicitor
Ms B Jinks Standards and Advisory Lead
Mx K Richardson Senior Standards and Advice Officer/Solicitor
Ms S Bruce-Smith Senior Standards and Advice Officer
Ms L Lockett CEO
Dr M Greene President
Miss P Mosedale PSS Medicines Advisor/Former Lead Assessor
Present for AI 4(a) only

AI 1 Apologies for absence and declarations of interest

1. The Chair welcomed the President and CEO to the meeting as observers.
2. The Chair thanked the Standards Committee for all their help over the last year, especially Martin Peaty, Dave Leicester, and Caroline Allen who are retiring from RCVS Council and Standards Committee in July 2021.
3. Apologies were received from James Wood.
4. Caroline Allen declared an interest in AI 3(e) as the RSPCA has been asked for comment on darting deer. Dave Leicester declared that he works for IVC which has now purchased Paw Squad.

AI 1 Minutes of the meetings held on 4 March 2021 - Confidential

5. It was agreed that the minutes of the previous meetings are accurate.
6. Confidential information related to the action items is available in the classified appendix at paragraph 1.

AI 2 Standards and Advice Update

7. The update was noted.

Matters for discussion

AI 3(a) Covid-19 temporary guidance on remote prescribing – Confidential

8. Confidential information is available in the classified appendix at paragraphs 2 to 6.

AI 3(b) Under care - Confidential

9. Confidential information is available in the classified appendix at paragraphs 7 to 9.

AI 3(c) Fraudulent prescriptions

The President joined the meeting.

10. The paper was introduced. It was explained that a common example of prescription fraud is where an animal owner is provided with a single use written prescription which they get dispensed multiple times at numerous pharmacies. One reason that this may happen is that unlike with NHS prescriptions, written veterinary prescriptions are returned to the animal owner once dispensed and are not registered or audited by an internal or central system.
11. The issue was raised by the RCVS at the last joint RCVS/VMD meeting, where there was discussion around the possibility that animal owners could choose a nominated pharmacy for written prescriptions to be sent to by the veterinary practice directly, instead of being provided with the prescription - this suggestion was noted, however, it was agreed that it cannot be insisted upon. It was noted that if the vet practice nominated the pharmacy, this might impede on the client's freedom of choice, however this might be remedied by allowing the client to nominate the pharmacy. It was also noted that there is nothing in the Veterinary Medicines Regulations 2013 ('VMRs') to restrict animal owners in relation to the use of written prescriptions. The VMD acknowledged the issue of prescription fraud, and are considering additional controls, although reported that it would not be possible to include this in the next consultation for the VMRs, but instead the one that follows.

12. The Committee's initial observations were as follows:

- a) It was suggested that a unique reference number could be used for prescriptions to be checked against on a database.
- b) It was raised that if pharmacists are required to follow any written instructions on a prescription, then wording that requires that pharmacists see and scan in the original prescription before dispensing against it could be added by veterinary surgeons to written prescriptions. It was noted, however, that whilst this suggestion would be useful in respect of online pharmacies where the client is required to send the prescription over, the risk might remain where prescriptions were dispensed at pharmacies in person, as the pharmacist may return the prescription to the client enabling them to reuse it at another pharmacy as there is currently no obligation for pharmacists to retain written prescriptions. It was noted that this requirement already exists in legislation in relation to prescriptions for controlled drugs and it was queried whether it would be possible to introduce this requirement for all medicines when the legislation does not provide for it. It was agreed that this should be researched further.

Action: Standards and advice team

13. It was further agreed that the obligations of pharmacists in relation to wording on written prescription should be researched. If appropriate, a communication should be drafted to the profession encouraging prescribing veterinary surgeons to give instructions that pharmacists must see and retain the original prescription prior to dispensing.

Action: Standards and Advice Team

14. It was agreed that the profession in general is aware of this issue and may have data available that would highlight the problem e.g., practices could use practice management systems to determine if another prescription was issued when predicted, as lack of this repeat could suggest that the client has re-used a previous written prescription. It was agreed that the Major Employers Group could be asked for this data in the first instance.

Action: Head of Legal Services (Standards)

AI 3(d) Vet AI - Confidential

15. Confidential information is available in the classified appendix at paragraph 10.

AI 3(e) Deer darting – Confidential

16. Confidential information is available in the classified appendix at paragraph 11 to 15.

Matters for decision

AI 4(a) PSS – Schedule 3 controlled drugs

Pam Mosedale joined the meeting.

17. The paper was introduced, and it was explained that it is not currently a legal requirement that Schedule 3 controlled drugs are stored securely, as it is with Schedule 2 controlled drugs. While it is also not Core Standards PSS requirement, it is advised as good clinical practice in the PSS modules and the RCVS controlled drugs guidance. As it is not included as an obligation in Core, it is difficult for PSS Assessors to enforce it. It was proposed to the Committee that the secure storage of all Schedule 3 controlled drugs be made a Core Standards requirement, and therefore a requirement of all veterinary surgeons.
18. It was acknowledged that there may be issues with storage space due to pandemic-related delays in the destruction of controlled drugs.
19. There was discussion around whether it should be made a Core Standards requirement when it is not a legal requirement, but it was expressed that it would help prevent the opportunistic theft of drugs as there is some evidence of misuse of Schedule 3 controlled drugs and they do have a street value.
20. It was explained that the proposal is for Schedule 3 controlled drugs to be locked away securely, for example in a pedestal drawer, and separate from the controlled drugs cabinet, as increasing the regularity of access to Schedule 2 controlled drugs may present an increased risk for practice staff.
21. It was agreed that the RCVS would encourage practices to liaise with neighbouring practices to support each other in the destruction and witnessing of controlled drugs.

Action: Standards and Advice Team

22. The Committee unanimously agreed with the proposal.

Action: Practice Standards Team

Pam Mosedale left the meeting.

AI 4(b) Supporting guidance update - anaesthesia

23. The paper was introduced, and it was explained that the proposed changes have already been agreed by this Committee for the PSS Small Animal Module at Core level relating to an additional staff member being present during treatment that requires the maintenance and monitoring of anaesthesia. It was proposed to the Committee that additional paragraphs be added to Chapters 2 and 18 of the supporting guidance to reflect the PSS guidance.
24. There was discussion regarding whether the requirement would apply to large animals as well as small animals, and it was clarified that it would apply to small animals only.
25. It was agreed that the intention behind the proposed guidance related to general anaesthesia only and not local anaesthesia or sedation. It was agreed that the word 'general' would be added to the guidance when anaesthesia is referenced.
26. There was discussion regarding how a vet could demonstrate that the person providing the anaesthesia support had undertaken relevant training. It was clarified that as student veterinary nurses and student vets will already be in training, this would be sufficient evidence. For all other staff, PSS Assessors will request to see evidence of anaesthesia training, which can be provided in-house.
27. The Committee expressed concern around whether the assistance of a lay member of staff would be appropriate. It was explained that the supporting guidance does recommend that the most suitable person to assist is an RVN or SVN, and that caution needs to be taken not to exclude practices that may not have adequate RVN/SVN support.
28. The Committee unanimously agreed with the proposed additions to the supporting guidance, subject to the addition of the word 'general'.

Action: Standards and Advice Team

AI 4 (c) Tuk's Law - Confidential

29. Confidential information is available in the classified appendix at paragraphs 16 to 20.

AI 5(a) Disciplinary Committee report

30. The report was noted.

AI 5(b) Practice Standards Scheme report

31. The report was noted.

AI 6(a) Recognised Veterinary practice Subcommittee report – Confidential

32. Confidential information is available in the classified appendix at paragraph 21.

AI 6(b) Ethics Review Panel report – Confidential

33. Confidential information is available in the classified appendix at paragraph 22.

AI 6(c) Certification Subcommittee report – Confidential

34. Confidential information is available in the classified appendix at paragraph 23.

AI 6(d) Riding Establishments Subcommittee report – Confidential

35. Confidential information is available in the classified appendix at paragraph 24.

7(a) Risk and equality

36. The 5 risks referenced in the risk report were noted.

37. The Committee noted an additional risk in relation to compliance with the proposed microchip scanning guidance due to the current database issues.

38. It was noted that there may be a reputational risk relating to the OV paperwork for pet travel, as vets are being associated with changes that they have not been involved in making.

AI 8 Any other business

Signing over animals

39. It was noted that in circumstances where animals are signed over to a practice due to the animal owner being unable to afford treatment and the animal is subsequently rehomed to a member of staff, there is a risk of a perceived conflict of interest especially where animal owners may feel they have been pressured to sign the animal over. The risk was noted as coming out of PIC/DC liaison.
40. It was agreed that it was not a matter for the supporting guidance, however, the issues around this might be highlighted by way of a case study for dissemination to the profession.

Action: Standards and Advice Team

VCMS common issues

41. The Registrar advised that this item had also come out of PIC/DC liaison and referred to communication around the commonality of issues addressed by both the VCMS and the RCVS concerns process.
42. It was noted that the RCVS Academy was due to launch soon, and that the RCVS could look to offer a joint webinar with the VCMS with information for practices around the commonality of issues.
43. The Committee supported the proposal.

Action: Head of Legal Services (Standards)

Dog microchipping regulations

44. The Chair advised that the RCVS has been asked by Defra, alongside other relevant stakeholders, to comment on the dog microchipping regulations and an email survey would be circulated shortly. It was asked that the Committee respond to the survey by the end of the month.

Action: Standards and Advisory Lead and Standards Committee

Date of next meeting

45. The date of the next meeting is 13 September 2021.

46. The Committee discussed whether to revert to face to face meetings, and it was suggested that from a sustainability perspective the Committee would need to justify the need for face-to-face meetings once social distancing restrictions are lifted.
47. It was suggested that smaller meetings should be held remotely and, where meetings are in person, there should always be the option to join remotely.
48. It was suggested that face-to-face meetings remain useful for new Committee members.
49. It was explained that there are ongoing discussions about how to hold meetings in the future, and the Committee will be updated on this decision when possible.

Table of actions

Paragraph(s)	Action	Assigned to
12-13	Research obligations of pharmacists in relation to wording on written prescriptions, and if appropriate a communication should be drafted to the profession encouraging prescribing veterinary surgeons to give instructions that pharmacists must see and retain the original prescription prior to dispensing.	Standards and Advice Team
14	Liaise with the Major Employers Group in relation to relevant data about fraudulent prescriptions.	Head of Legal Services (Standards)
21	Encourage practices to liaise with neighbouring practices to support each other in the destruction and witnessing of controlled drugs.	Standards and Advice team
22	Add the storage of all Schedule 3 controlled drugs as a Core Standard requirement.	Practice Standards Team
28	Publish amendments to Chapters 2 and 18 of the supporting guidance.	Standards and Advice Team
40	Prepare a case study on potential conflicts of interest arising from the rehoming of animals.	Standards and Advice Team
42-43	Prepare a joint webinar with VCMS for practices	Head of Legal Services (Standards)

44	Provide responses to DEFRA survey on dog microchipping regulations by the end of the month.	Standards and Advisory Lead and Standards Committee
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Summary

Meeting	Standards Committee
Date	16 July 2021
Title	Standards Committee Minutes
Summary	Minutes of Standards Committee held remotely on Friday, 16 July 2021, at 10am
Decisions required	None
Attachments	Classified appendix
Author	Beth Jinks Standards and Advisory Lead b.jinks@rcvs.org.uk

Classifications

Document	Classification ¹	Rationales ²
Paper	Unclassified	n/a
Classified appendix	Confidential	1, 2 and 3

1Classifications explained

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2Classification rationales

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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

Minutes of the Standards Committee held remotely on Friday, 16 July 2021, at 10 am

Members:

Dr L Allum	
Ms B Andrews-Jones	
Miss L Belton	
Mr M Castle	
Dr D Chambers	
Dr M A Donald	Chair
Dr M Gardiner	
Ms C-L McLaughlan	
Prof T Parkin	
Mrs C Roberts	

In attendance:

Ms E C Ferguson	Registrar
Ms G Kingswell	Head of Legal Services (Standards)
Ms B Jinks	Standards and Advisory Lead
Ms S Bruce-Smith	Senior Standards and Advice Officer
Dr M Greene	Senior Vice President/Council observer

AI 1 Apologies for absence and declarations of interest

1. The Chair welcomed the Senior Vice President to the meeting as an observer.
2. Apologies were received from Claire Roberts.
3. There were no new conflicts of interests declared, however Danny Chambers reminded the Committee that he provides consultancy work to online veterinary wellness platform 'MyDogDoc'.

AI 2 Covid-19 temporary guidance on remote prescribing – Confidential

4. Confidential minutes relating to this agenda item can be found in paragraphs 1-5 of the confidential appendix.

AI 3 Any other business

5. The Chair requested that those who are interested in becoming Vice-Chair of this Committee or the Standards Committee's Finance Resource Committee representative volunteer via email to the Chair. The positions will then be agreed at or before this Committee's September meeting.

Date of next meeting

6. It was explained that there will be two extra meetings before the next scheduled meeting of this Committee: 1) to discuss 'under care' survey results, 2) to discuss issue relating to the certification of fish exports. Dates for these meetings will be established shortly.

Action: Standards and Advice Lead

Table of actions

Paragraph(s)	Action	Assigned to
6	Plan two additional Standards Committee meetings	Standards and Advice Lead

Summary	
Meeting	Standards Committee
Date	4 August 2021
Title	Standards Committee Minutes
Summary	Minutes of Standards Committee held remotely on Wednesday, 4 August 2021, at 2pm
Decisions required	See classified appendix
Attachments	Defra proposal (Annex A) Regulations containing the definition of 'aquatic animals' (Annex B)
Author	Kimberley Richardson Senior Standards and Advice Officer/Solicitor Secretary to the Certification Sub-Committee k.richardson@rcvs.org.uk / 0207 202 0757

Classifications		
Document	Classification¹	Rationales²
Minutes	Unclassified	N/A
Classified appendix	Confidential	1, 2
Annex A	Confidential	1, 2
Annex B	Unclassified	N/A

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Minutes of the Standards Committee held remotely on Wednesday, 4 August 2021,
at 2pm

Members:

Dr L Allum	
Ms B Andrews-Jones	
Miss L Belton	
Mr M Castle	
Dr D Chambers	
Dr M A Donald	Chair
Dr M Gardiner	
Ms C-L McLaughlan	
Prof T Parkin	
Mrs C Roberts	

In attendance:

RCVS

Ms E C Ferguson	Solicitor/Registrar/Director of Legal Services
Ms B Jinks	Standards and Advisory Lead
Ms S Bruce-Smith	Senior Standards and Advice Officer
Mx K Richardson	Senior Standards and Advice Officer/Solicitor

DEFRA

Dr E Robertson	
Dr B Oidtmann	Head of Aquatic Animal Health Policy
C Harrold	
Mr D Lee	Joint Head of Aquatic Animal Health and Zoonoses and Endemic Diseases Policy
Dr M Lopez	Head of Veterinary Trade Facilitation
J De Vere	
A Gadsby	

Other

D Smith	CEFAS
Dr S Voas	Chief Veterinary Officer (Scotland) (CVO Scotland)
Mr R Soutar	Head of Veterinary Services, Scottish Sea Farms

AI 1 Apologies for absence and declarations of interest

1. Apologies were given for Mandisa Greene, Tim Parkins, Belinda Andrews-Jones, and Claire Roberts.
2. There were no new declarations of interest.

AI 2 Certification of Fish – Confidential

3. Confidential minutes relating to this agenda item can be found in the confidential appendix.

AI 3 Any other business

4. It was noted that there were two volunteers for the new vice chair, and one volunteer for the position of Finance Resource Committee representative, and a decision would be made at the next meeting in relation to the Under Care Review.

Date of next meeting

5. The date of the next Committee meeting is 21 August 2021.

Table of actions

6. Please see confidential appendix.

Summary	
Meeting	Standards Committee
Date	13 September 2021
Title	Consultation on Commercial and Non-Commercial Movements of Pets into Great Britain
Summary	<p>The Committee's views are sought on a consultation by Defra on the government's proposed changes to the rules governing the commercial and non-commercial movement of pets (dogs, cats and ferrets) into Great Britain (England, Scotland and Wales). As stated on the consultation website, the key proposed measures include:</p> <ul style="list-style-type: none"> • Increasing the minimum age at which dogs can be brought into Great Britain (commercial and non-commercial dog movements). • Prohibiting the commercial and non-commercial movement into Great Britain of dogs with cropped ears and docked tails. • Prohibiting the commercial and non-commercial movement of heavily pregnant dams (female dog) into Great Britain.
Decisions required	<p>The Committee is asked:</p> <ol style="list-style-type: none"> a. to provide a response to the consultation.
Attachments	None
Author	<p>Beth Jinks Standards and Advice Lead b.jinks@rcvs.org.uk</p>

Classifications

Document	Classification ¹	Rationales ²
Paper	Unclassified	

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Background

1. The government has recently introduced the Animal Welfare (Kept Animals) bill in Parliament – at the time of writing the Bill's second reading was in process in the House of Commons, and as such, the Bill is not yet legislation. This Bill intends to give powers to Defra to create regulations which would restrict the importation of an animal in order to preserve and promote welfare. These regulations would apply to a dog, cat or ferret that is below a certain age, had been mutilated, or is more than a specific number of days pregnant ([section 46\(2\)](#)).
2. The Bill also deals with other issues such as the attacking and worrying of livestock by dogs, and licences for keeping primates, but the Committee is not asked to comment on these.

Advice queries

3. The Standards and Advice team will regularly answer queries from the profession regarding suspected illegal imports of animals, the overwhelming majority of these being dogs. Since the beginning of 2021, the team has answered 161 queries on this topic. A survey of these queries reveals the following common concerns:
 - a. No passport/the wrong passport
 - b. Puppy clearly too young to have been imported
 - c. Puppy very unwell and is suspected to be too young to have been imported
 - d. Lacking rabies vaccinations
4. The guidance for the profession for dealing with a suspected illegal imports is in chapter [14](#) of the supporting guidance to the Code of Professional Conduct, and currently consists of information relating to client confidentiality and making reports to the relevant authorities (e.g. the local authority, trading standards, the RSPCA). It is not proposed that this guidance be amended at this time.

Proposed consultation answers

5. The government has asked for views on the proposed Bill via a consultation. The consultation requests responses relating to increasing the age of commercial and non-commercial import of animals, as well as limitations of importation after certain gestations periods, and for animals with non-exempted mutilations.
6. Questions 1-3 below focus on the age a puppy should be before it can legally be imported into GB. It is proposed that the age be increased from a minimum of 15 weeks (rabies vaccine at 12 weeks plus a 21 day wait period), to 6 months. The consultation document provides the following reasons:

- a. Currently dogs are being imported that are suspected to be 4 or 5 weeks of age: *'These puppies are being transported well under the recommended age for sale at 8 weeks old, following early separation from their littermates and mother. There are therefore considerable concerns over unnecessary stress and poor socialisation.'*
 - b. It is easier for a pet checker at a transport hub to identify when a dog is 6 months as opposed to when it is 15 weeks. For example, *'at 6 months old, the majority of dogs will have a full set of permanent incisors, canine and premolar teeth, and can therefore be distinguished far more accurately'.*
 - c. The trade in young and low welfare puppies increased in from 2019 to 2020. In 2019 324 dogs were intercepted, and in 2020 843 dogs were intercepted.
 - d. Owners looking for a puppy will generally want one younger than 6 months, so increasing the age at which a dog could be imported would *'significantly disrupt the movement of young dogs into Great Britain for sale and thereby result in significantly fewer low welfare breeding operations supplying the Great Britain market.'*
7. In relation to questions 3 and 6, an exception to the proposed regulations would cover situations where owners are unjustly impacted by this legislation. For example: *'where an individual is permanently relocating to GB with their dog or where there is a strong case that the individual should not be separated from their dog even on a temporary basis.'* The exception may also apply when the owner urgently needs to enter GB, such as in the event of sudden natural disaster, political unrest, or other force majeure events.

Consultation question
<p>1. To what extent do you agree or disagree that the government should increase the minimum age that dogs can be moved into Great Britain under the commercial rules from 15 weeks to 6 months?</p> <p>(Required)</p> <p>Strongly Agree</p> <p>Agree</p> <p>Neither Agree nor Disagree</p> <p>Disagree</p> <p>Strongly Disagree</p> <p>Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.</p>
<p>2. To what extent do you agree or disagree that the government should increase the minimum age that dogs can be moved into Great Britain under the non-commercial rules from 15 weeks to 6 months?</p> <p>(Required)</p> <p>Strongly Agree</p> <p>Agree</p>

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.

3. To what extent do you agree or disagree that the government's proposed exception is appropriate (that the Secretary of State (or ministers in Scotland and Wales) can permit the landing of a puppy if it is compliant with the health and documentary requirements for entry to Great Britain and if evidence is provided that justifies that exceptional circumstances apply)?

(Required)

Strongly Agree

Agree

Neither Agree or Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, how you think these exceptions could be demonstrated, what factors you think the Secretary of State (or Minister in Scotland and Wales) should consider when permitting a landing, and describe any additional exceptions that you think should be included.

8. Questions 4-6 relate to banning the commercial and non-commercial importation of dogs into GB with non-exempted mutilations such as cropped ears and docked tails. The consultation document provides the following reasons:
- It is illegal to crop ears (save for clinical reasons) or to dock a tail (subject to exemptions in legislation) of a dog in GB. However, there is still demand for dogs with these mutilations in GB.
 - According to the RSPCA there has been a 620% increase in reports of ear cropping and cropped ears in England and Wales since 2015. It is suspected that a majority of these reports are for dogs that are being imported, or are being sent abroad to have the procedure.
 - There has been an increase in the amount of dogs being illegally landed between 2019 (60 dogs) to 2020 (175).
 - 'Fundamentally, this ban would make the purchase or ownership of a dog with a non-exempted mutilation extremely difficult as they would not be legally accessible.'*
 - The government note that this proposal would also cover rescue dogs, and would prevent owners that have dogs which are subject to non-exempted mutilation after the legislation comes into force from traveling into GB with their dogs. The government considers this to be proportionate and necessary.

4. To what extent do you agree or disagree that the government should introduce a ban on the **commercial** movements of dogs with non-exempted mutilations into Great Britain?

(Required)

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.

5. To what extent do you agree or disagree that the government should introduce a ban on the **non-commercial** movement of dogs with non-exempted mutilations into Great Britain?

(Required)

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.

6. To what extent do you agree or disagree that the government's proposed exceptions are appropriate.

(Required)

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

a) where the prohibited procedure has been carried out on the dog by a veterinary surgeon or any other person permitted to carry out that procedure in an emergency for the purpose of saving the life or relieving the pain of the dog?

b) in the case of tail docking, the mutilation was permitted as the dog is a recognised working dog?

c) the dog is an assistance dog (as defined under section 173 (1) of the Equality Act 2010)?

d) Secretary of State (or ministers in Scotland and Wales) can permit the landing of a dog with a non-exempted mutilation if it is compliant with the health and documentary requirements for entry to Great Britain and if evidence is provided that justifies that exceptional circumstances apply?

e) the procedure was carried out before the prohibition comes into force?

Please provide any comments or evidence to support your answer, how you think these exceptions could be demonstrated, what factors you think the Secretary of State (or ministers in Scotland and Wales) should consider when permitting a landing, and describe any additional exceptions that you think should be included.

9. Questions 7-10 relate to the banning of commercial and non-commercial import of dogs which are more than 42 days pregnant into GB. The consultation document provides the following reasons:
- a. The current rules for commercial importation of dogs is that a pregnant dam cannot be imported during the final 10% of gestation (i.e. the final week of pregnancy, or after 56 days). Detection of this stage of pregnancy is extremely difficult, and the existing rules are *'not sufficient to tackle the emerging practice of importing heavily pregnant dams, because it is very difficult to enforce.'*
 - b. The proposal bans commercial and non-commercial import of dams more than 42 days pregnant (within the final 33% of gestation). *'At 42 days, there are more reliable markers (the kidneys have developed in the foetus which can be detected by scanning) and so pregnant dams can be reliably identified (by a veterinarian) via a scan once they have passed this stage.'* In addition, dams that are visibly pregnant are likely to be over 42 days pregnant, which will mean that pet checkers at points of entry into GB will have greater confidence in seizing these dogs.
 - c. From January 2020 – May 2021, 31 heavily pregnant dams were detained upon landing.
 - d. There are concerns about the low welfare in the facilities where the dams have been kept before being transported.
 - e. It is reported that the same animal is moved back and forth from Eastern Europe by unscrupulous traders, in order to allow them to give birth in GB before being transported back to breed again in cheaper and low welfare conditions.

7. To what extent do you agree or disagree that the government should introduce a ban on the **commercial** movement into Great Britain of dogs which are more than 42 days pregnant?

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.

8. To what extent do you agree or disagree that the government should introduce a ban on the **non-commercial** movement into Great Britain of dogs which are more than 42 days pregnant?

(Required)

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.

9. To what extent do you agree or disagree that the government should introduce a ban on the **commercial** movement within Great Britain (domestic movements) of dogs which are more than 42 days pregnant?

(Required)

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.

10. Do you think there should be exceptions set out under this proposal? If so, describe the exception and any comments or evidence to support your answer.

Please provide any comments or evidence to support your answer or outline any alternative solutions or unintended consequences.

10. Questions 11 and 12 relate to enforcement of the new regulations. The consultation document provides the following accompanying information:

- a. Under existing rules, *'any animal found to be non-compliant with the pet travel health requirements may be refused entry, returned to its country or territory of dispatch, detained until compliant, or, as a last resort destroyed.'*
- b. It is proposed that similar enforcement powers will apply to the new regulations.
- c. Under existing rules, if an animal is illegally landed in GB and the owner is known, that person is normally required to facilitate the detention of the animal. It is proposed that under the new regulations that the relevant authority (APHA or local authority) could also arrange this detention, even when the owner is known. The owner would still be responsible for the fees. This would only be used when necessary and the owner would normally still be required to arrange the detention.

- d. It is acknowledged that in reality this will lead to non-compliant animals being abandoned, however the proposed legislation will describe a process for the transfer of ownership of these animals to the relevant authority and then rehomed.
- e. Where an animal has been seized, the animal will be held in quarantine or boarded and reasonable attempts made to identify the owner. Once contacted, the owner would be given seven days to contact the relevant authority and pay outstanding fees and arrange care with a boarding facility or re-export the dog. If the owner fails to do so, or cannot be contacted or identified by the eighth day of seizure, the animal is considered abandoned and ownership would transfer to the relevant authority.

11. To what extent do you agree or disagree with the government's proposal to introduce a seizure power that will allow the relevant authority to arrange for the detention of non-compliant animals in all cases, including where the owner is present?

(Required)

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.

12. To what extent do you agree or disagree with the government's proposal to set out a seven-day detention period in law?

(Required)

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.

11. Questions 13 and 14 relate to penalties. The consultation document provides the following accompanying information:

- a. The current maximum penalty for illegal landing a dog in GB is 12 months in prison or an unlimited fine.
- b. It is proposed that new criminal offence would be created for illegal landing under the age of 6 months and/or has a non-exempted mutilation and/or is more than 42 days pregnant. This would lead to a maximum penalty of 5 years in prison (if convicted on indictment) or an unlimited fine.

- c. This would be in line with maximum penalties for animal welfare offences under the Animal Health and Welfare (Scotland) Act 2006.

13. To what extent do you agree or disagree that a maximum penalty for illegally landing a dog of 5 years in prison or an unlimited fine is appropriate?

(Required)

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.

14. To what extent do you agree or disagree that monetary penalties would be a useful enforcement tool under this legislation?

(Required)

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.

12. Question 15 relates to the illegal cat importation trade. It is proposed that no new regulations be introduced for cats. The consultation provides the following reasoning:

- a. There is limited evidence that there is a significant issue of illegal cat importation.
- b. In 2020, only 6,768 cats were commercially imported into GB, compared to 66,952 dogs. Additionally in the same year only 17 kittens (less than 15 weeks) and no pregnant cats were seized.
- c. The existing age limit for importation of a cat from an EU or listed country is 15 weeks.
- d. The existing gestation limit for importation of pregnant cats is the final 10% of pregnancy.

15. To what extent do you agree or disagree with the government's proposal to retain existing requirements in relation to the commercial import and non-commercial movement of cats?

(Required)

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.

13. Question 16 relates to the illegal ferret importation trade. It is proposed that no new regulations be introduced for ferrets. The consultation provides the following reasoning:

- a. There is no evidence of a significant illegal ferret importation trade or low welfare movements into GB. Only 10 ferrets were moved commercially into GB in 2020, and 45 were moved non-commercially.
- b. The existing gestation limit for importation of pregnant ferrets is the final 10% of pregnancy.

16. To what extent do you agree or disagree with the government's proposal to retain existing requirements in relation to the commercial import and non-commercial movement of ferrets?

(Required)

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please provide any comments or evidence to support your answer, including whether you think this is a proportionate approach and outlining any alternative solutions or unintended consequences.

Decision

14. The Committee is asked:

- d. to provide a response to the consultation.

Summary	
Meeting	Standards Committee
Date	13 September 2021
Title	Disciplinary Committee Report
Summary	Update of Disciplinary Committee since the last Standards Committee meeting held on 10 May 2021
Decisions required	None
Attachments	None
Author	Yemisi Yusuph Clerk to the Disciplinary Committee Tel: 020 7202 0729 Email: y.yusuph@rcvs.org.uk

Classifications		
Document	Classification ¹	Rationales ²
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

Report of Disciplinary Committee hearings since the last Standards meeting on 10 May 2021

Background

1. Since the last update to Standards on 10 May 2021, the Disciplinary Committee ('the Committee') have met on six occasions, the RVN Committee met once.

Hearings

Nicola Jade Burrows

1. The Disciplinary Committee met between Tuesday 4 and Wednesday 12 May to hear the Inquiry into Miss Burrows.
2. The inquiry was in relation to Miss Burrows creating an inaccurate clinical history for her own horse and then dishonestly attempting to make an insurance claim for the treatment of her horse. There was a total of 11 charges that were brought against Miss Burrows.
3. The first Charge against Miss Burrows was that she had re-registered her horse at the Cardiff equine practice where she worked under a different patient name, and had failed to consolidate the new record with the previous one, in November 2017.
4. The second Charge against Miss Burrows was that she had failed to make entries into the practice's clinical records for her horse in terms of its history of epistaxis (nose bleeds) and the investigations into this condition. This was alleged to have occurred between 1 November 2017 and 13 March 2018.
5. Charges 3 to 9 were all in relation to numerous email correspondence and telephone conversations that were exchanged between Miss Burrows and employees of the NFU Mutual (an insurance company) between 2 January and 14 June 2018. Miss Burrows had failed to disclose to the insurance company, the horse's full clinical history. It was alleged that she had knowingly provided false statements. These statements included the details that suggested that the horse's condition of epistaxis had started more recently than it actually had.
6. Charge 10 alleged that Miss Burrows asked a veterinary surgeon colleague to provide incorrect and dishonest information to the insurance company in relation to the date of an endoscopy that had been performed on her horse in or around November or December 2017.
7. The full charges can be found here: [Burrows, Nicola Jade, Charges - Professionals \(rcvs.org.uk\)](https://rcvs.org.uk/Burrows,NicolaJade,Charges-Professionals)
8. At the outset of the hearing Miss Burrows admitted to Charges 2 to 9 but denied that she had: created a new record for her horse under a different name for the purposes of concealing its clinical history; that she had attempted to induce a veterinary surgeon colleague to provide false information about the treatment of her horse; and that she had acted dishonestly in her dealings with the insurance company.
9. The Committee first considered with the facts of the case could be proved, in relation to Charges 1 to 10. They heard live evidence from colleague who it was alleged she had proved misleading information to. After hearing from the witness, the Committee found all Charges proven, and found the witness to be a credible one.

10. After finding all charges against Miss Burrows proven, the Committee went on to consider whether the charges amounted to disgraceful conduct. In doing so, the Committee took into account the pre-medicated nature of Miss Burrows' conduct, as she had set up the second record for her horse with the intention of benefitting financially by providing false information. Likewise, the Committee considered that Miss Burrows had abused her professional position by asking her colleague who was a practice administrator to, unknowingly, provide false information to the insurance company on her behalf and in attempting to induce a veterinary surgeon colleague to lie on her behalf.
11. After considering all facts, the Committee found Miss Burrows guilty of disgraceful conduct in respect of all charges.
12. The full decision on the Findings of Facts and Disgraceful Conduct can be found here: [Burrows, Nicola Jade, Decision on Facts and on Disgraceful Conduct in a Professional Respect - Professionals \(rcvs.org.uk\)](https://www.rcvs.org.uk/decisions/burrows-nicola-jade-decision-on-facts-and-on-disgraceful-conduct-in-a-professional-respect)
13. The Committee did note that *"in the event, no actual harm had been occasioned to any animal or person, although the case was not a clinical case per se. There had been an attempt at, but no actual, financial gain. The Committee had not been informed of any previous regulatory findings against Dr Burrows. Dr Burrows had made some, limited, admissions to the College in her responses to it. There was clear evidence of a problematic environment at the practice at the time of the events. Dr Burrows has admitted a number of the Charges, including her dishonesty, before the Committee. Dr Burrows has apologised for that to which she admitted and in the Committee's view has displayed a limited degree of insight."*
14. After finding Disgraceful Conduct, the Committee went on to consider the appropriate sanction to impose on Miss Burrows. The Committee took into account the representations that were made, in which she acknowledged that she has let down the veterinary profession. The fact that she had breached the Code several times, and it was also emphasised that her actions had prejudiced the delicate relationship between the public and the profession and had tarnished the reputation of the profession. Miss Burrows asked the Committee for the opportunity for a second chance, saying that she had started her own veterinary practice now and that honesty and integrity were now integral to her practice.
15. The Committee also heard several character witnesses as well as testimonials from both professional colleagues and clients attesting to her integrity and capabilities as a veterinary surgeon. Miss Burrows' counsel also highlighted that at the time of the misconduct she was young and relatively new to veterinary practice and had been going through a difficult time, both professionally and personally.
16. After weighing out all the mitigating and aggravating factors, the Committee decided that Miss Burrows should be removed from the register. The Committee stated that: *"honesty in a veterinary surgeon is a fundamental professional issue, and that is the case regardless of age and experience. The public, other professionals and insurers all at times rely on the word of a professional veterinary surgeon to honestly attest to matters of importance. All need to be able to trust the veterinary surgeon. Any departure from a standard of honesty undermines public confidence in the profession."*
17. The Committee found that Miss Burrows' dishonesty had occurred over roughly five months, and she had had several opportunities to desist from it. However, it took until [a colleague] raised the issue with Dr Burrows before she took steps to end the claim. The Committee

concluded that Miss Burrows had put her own interests ahead of those of the public and undermined the trust that underpins the relationship with insurers.

18. The full decision on sanction can be found here: [Burrows, Nicola Jade, Decision on Sanction - Professionals \(rcvs.org.uk\)](https://rcvs.org.uk/decisions/Burrows-Nicola-Jade-Decision-on-Sanction-Professionals)

David Chalkley

19. Between Monday 12 and Thursday 21 May, the Committee met to hear the Inquiry into Mr Chalkley.

20. The Inquiry was in relation to three charges against him. The charges were in relation to intradermal Comparative Tuberculin (ICT) tests which he undertook at a farm on 5 March 2018 and 8 March 2018. It is alleged that he had failed to identify all or at least some of the animals tested. It was also alleged that Mr Chalkley had certified that he had carried out ICT tests on 279 at the farm and recorded the results on the accompanying paperwork but had, in fact, not adequately identified some or all of the 279 animals and had fabricated the skin thickness measurements recorded for some of them. In addition, the charge alleged that Mr Chalkley's conduct was dishonest, misleading and risked undermining government testing procedures designed to promote public health. The final allegation against Mr Chalkley was that between 1 June 2011 and 1 September 2018, he had received payment of approximately £20,000 for ICT tests when, as a result of his conduct in relation to ICT tests at the farm, he was not entitled to such payment.

21. At the outset of the hearing, Mr Chalkley admitted the first charge. In that he had not on 5 March 2018 and 8 March 2018 adequately identified some of the animals. On the third day of the hearing, during his evidence to the Committee, he admitted that his certification of the ICT testing was therefore misleading. He denied the rest of the charges including that his conduct had been dishonest and that it had risked undermining government testing procedures designed to promote public health.

22. In considering the charges against Mr Chalkley, the Committee heard that discrepancies regarding the tests that were carried out on the farm in March 2018 were originally raised by the Animal and Plant Health Agency (APHA), on whose behalf Mr Chalkley carried out ICT testing in his capacity as an Official Veterinarian.

23. When Mr Chalkley gave evidence during the hearing, he explained that he had taken over TB testing for the farm in 2008 and that working conditions on the farm had been difficult throughout the whole period 2008 to 2018. He stated that due to the harsh weather conditions of early 2018, TB testing was difficult, and that the farmer needed to complete the test by March 2018 to avoid a financial penalty.

24. Mr Chalkley explained that one of the reasons for there being limited time available for him to carry out the test within the time required by the farmer was that he was due to provide veterinary cover at the Cheltenham races the following week and he was unable to find anyone else to cover the tests. Mr Chalkley also explained that during the tests on 5 and 8 March there had been limited farmhands available to assist in processing the cattle through the tests.

25. In the course of being asked questions by counsel for the RCVS, Mr Chalkley accepted that he had failed to identify some 45% of the animals he had injected on 5 March 2018 and had, in respect of each of the skin thickness measurements for those animals, randomly chosen a

figure that he believed would be appropriate based on the breed, age and sex of the animal. The APHA guidelines state that specific measurements should be made and recorded for each individual animal using callipers.

26. Mr Chalkley said that he could not remember seeing the “pop-up” declaration which appeared when submitting the results to the APHA online and had never read it. He stated that he was not aware that he was making a declaration. However, he accepted that as an Official Veterinarian he was confirming that he had carried out the test properly. While he agreed that he knew that the test contained inaccuracies, he did not accept that he was being dishonest when he submitted the results.
27. Having considered all the evidence put forward by the RCVS and Mr Chalkley in his own defence, the Committee found that Mr Chalkley had acted dishonestly in deliberately choosing not to take the measurements on 5 March and had instead submitted fabricated alternatives, and so risked undermining public health by failing to carry out his duties as an OV.
28. The Committee also concluded that Mr Chalkley had been acting dishonestly, as he knew that he was submitting the test results as if they were the authentic outcome of a properly conducted test when in reality, they were no such thing. The Committee did not accept Mr Chalkley’s evidence that he was unaware of the declaration which accompanied the submission of the test outcome. The Committee therefore found both the first and second charges proved.
29. In respect of the third charge the Committee found that this was not proven noting that the RCVS had not disproved Mr Chalkley’s explanation regarding his reasons for returning the £20,000 in fees he had received for carrying out TB testing at the farm from the APHA since 2011.
30. The Committee then went on to consider whether the first two charges, both of which had been found proven, amounted to serious professional misconduct, either individually or cumulatively.
31. *“The Committee was prepared to accept that the respondent considered the risk arising from his actions as negligible. Nonetheless, in the Committee’s assessment a real risk existed due to the respondent’s actions and it was precisely the risk which the authorised testing procedure was designed to negate. The simple fact is the respondent could not be sure that each animal he assessed on 8 March 2018 had also been seen by him on 5 March 2018.*
32. *“However, the wider point with which the Committee was concerned related to the importance of any member of the profession or public being able to rely absolutely on the integrity of veterinary certification. Those parts of the Code and supporting guidance [concerning certification]... were unequivocal. It was very difficult to conceive of circumstances in which it could ever be justifiable to certify the outcome of a test which had not, in fact, been conducted in a way which was demonstrably valid and reliable. Such conduct was bound to be regarded as disgraceful by members of the profession and the general public.*
33. *“For these reasons, the Committee has come to the conclusion that the respondent’s conduct in relation to the facts found proved was disgraceful conduct in a professional respect.”*

34. The Committee heard oral evidence in mitigation, including from a former colleague who had worked with him in practice since 2006, as well as receiving a large number of written testimonials from various sources that attested to his honesty, integrity, willingness to help others, and charitable work in support of animal welfare.
35. Mr Chalkley's counsel, in mitigation, highlighted his long and previously unblemished career, and characterised the conduct as an inexcusable but explicable error of judgement that was entirely isolated and out-of-character. Mr Chalkley's counsel added that he had not done anything that he thought was seriously wrong, and there was no evidence that any harm had been done and that any risk to public health was not serious.
36. The Committee accepted that the conduct was isolated and out-of-character and that, furthermore, Mr Chalkley had made early and frank admissions to the APHA and that he had displayed a degree of insight, although the Committee was less confident that he truly understood the seriousness of the potential consequences of his dishonest conduct.
37. The Committee took into account the aggravating factors, including Mr Chalkley's breach of trust of his position as an OV, the undermining of the integrity of veterinary certification, dishonesty and the potential public health impacts of his conduct.
38. *"The Committee considered that, having regard to the mitigating features which it had identified, a suspension order would be sufficient to send to the profession and the public a clear signal about the importance to be attached to accurate certification. The Committee considered that in the particular circumstances of this case, a period of three months suspension would be sufficient to achieve this objective."*
39. The Committee's full decision can be found here: [Chalkley, David, Decision - Professionals \(rcvs.org.uk\)](https://rcvs.org.uk)

Henry Eccles

40. On Wednesday 26 and Thursday 27 May, the Committee met to hear the resumption of the Inquiry into Mr Eccles.
41. In November 2018, Mr Eccles first appeared before the Committee where he admitted a number of clinical failings, including regarding his diagnosis of the cat, the keeping of accurate and detailed clinical records, giving the animal appropriate treatment, surgery and care, and failing to provide the cat's owners with adequate information on the cat's care upon discharge.
42. Mr Eccles admitted both charges against him, and the Committee found him guilty of serious professional misconduct. The Committee made the choice to postpone its decision on sanction on the condition that Mr Eccles agreed to abide by a set of undertakings in the interim. These undertakings included: the preparation of a personal development plan; the enrolment of his practice in the RCVS Practice Standards Scheme; the appointment of a veterinary mentor; the completion of additional training and CPD; and his agreement to pay any costs of complying with the undertakings, including the appointment of and work undertaken by the appointed mentor.
43. At the resumed hearing in May, the Committee considered whether Mr Eccles successfully complied with the undertakings he had agreed to in 2018.

44. The Committee received evidence from Mr Eccles confirming that he had complied with all the original undertakings. It also considered some further undertakings that Mr Eccles had agreed to in October 2020 when his reconvened hearing was postponed due to the coronavirus pandemic. These further undertakings included: confirming his compliance with the personal development plan he had drawn up in 2019; his practice achieving the Core Standards accreditation level within the Practice Standards Scheme (this was achieved in April 2021); continuing to meet with his veterinary mentor; and undertaking additional CPD – all of which were found to be completed.
45. The Committee also heard evidence from both the veterinary mentor and Mr Eccles himself. In his evidence, Mr Eccles apologised to the owners of the cat for the care he had provided, admitting that he had let them and himself down by not having sufficient knowledge to recognise the cat's needs and to provide him with a sufficient level of care. He also confirmed he was continuing to make improvements to his practice and that he had enjoyed the process of being mentored.
46. Having taken all the evidence into account, the Committee considered its sanction for the original admitted charges from November 2018. In the end, the Committee considered that a reprimand and warning as to future conduct was the most appropriate and proportionate sanction.

Laura Benson RVN

47. Between Monday 14 and Thursday 17 June, the Committee met to hear the Inquiry into Laura Benson RVN, which involved six charges against her.
48. The charges were in related to her conduct in which she took items from her veterinary practice without paying for them and for asking a colleague to dishonestly input one of her pet's clinical details against the records of another one of her pets, which was also registered at the practice.
49. At the outset of the hearing, Ms Benson admitted to charges 1,2,3,4 and 6 of the allegations and the Committee accepted these admissions. The Committee considered evidence from Ms Benson's colleagues including witness statements, written testimonial and clinical records for her animals.
50. When asked about taking items from the practice, Ms Benson explained that she did not intend to take items without paying for them and that she had not realised how much she had taken. She also explained that she had paid back in full what she owed to the practice. The Committee considered that Ms Benson's conduct had involved a degree of premeditation as she had repeatedly taken items over an extended period. They also considered that there had been a potential risk of injury to animals resulting from Ms Benson's request to incorrectly write up her animal's veterinary records.
51. The defence attested that no actual harm had come to any animal because of Ms Benson's actions and that she previously had an unblemished career in veterinary nursing. She had also admitted most of the charges against her and paid for the items she had taken in full.
52. The Committee found Ms Benson guilty of serious professional misconduct and in deciding on sanction, the Committee considered all the evidence before it and the submissions from both parties. The Committee decided that a nine-month suspension from the Register was the

most appropriate sanction and was one that best took the public, and Ms Benson's, interest into account.

53. The Committee stated in its decision that *"the Committee accepted that Ms Benson had developing insight in making her admissions and we give her credit for her long unblemished career. She admitted to a large part of the allegation, expressed remorse for her actions and has repaid the practice. We have also heard a number of positive testimonials which spoke positively of Ms Benson's recent conduct"*

54. The Committee's full decision on finding of facts and misconduct can be found here: [Decision on Facts and on Disgraceful Conduct in a Professional Respect - Professionals \(rcvs.org.uk\)](https://rcvs.org.uk/Decision-on-Facts-and-on-Disgraceful-Conduct-in-a-Professional-Respect-Professionals)

55. When making its decision sanction, the Committee considered all matters and concluded that the appropriate and proportionate sanction, was to suspend Ms Benson's registration for nine months.

56. The full decision on sanction can be found here: [Decision on Sanction, Benson, Laura - Professionals \(rcvs.org.uk\)](https://rcvs.org.uk/Decision-on-Sanction-Benson-Laura-Professionals)

Louise Henry

57. Between Monday 21 and Tuesday 22 June, the Committee met to hear the Inquiry into Dr Louise Marie Henry.

58. The charge against her was in relation to her conduct in which wrote a letter on behalf of a client that dishonestly claimed that a pregnant ewe had died whilst in transit to a veterinary practice where she was employed, when in fact she had euthanised the ewe at the practice following a caesarean section.

59. The full charge can be found here: [Henry, Louise, Charges - Professionals \(rcvs.org.uk\)](https://rcvs.org.uk/Henry-Louise-Charges-Professionals)

60. The Committee heard that the ewe was lambing and brought to the practice by a client. Dr Henry was on-call at the time and advised a Caesarean section. The client agreed and Dr Henry delivered two live lambs and one dead lamb. Dr Henry was concerned about the welfare of the ewe post-surgery because of the risk of peritonitis and advised that the ewe should be euthanised. The client agreed to the ewe being euthanised and then asked Dr Henry to write a letter in which it was stated that the ewe had died in transit on route to the practice. Dr Henry agreed to write the letter in which she falsely certified that the ewe had died in transit. The letter was written on practice letterheaded paper, the letter was addressed "To whom it may concern" and was signed "Louise Henry MRCVS".

61. The letter relating to charge 1 came to light on 29 January when the practice director found the letter about the ewe's cause of death in an insurance file. The practice arranged an investigatory meeting with Dr Henry where she admitted that writing the letter was an error of judgement. When asked about her conduct, Dr Henry explained that the client had subsequently been dissatisfied with the letter she had written and asked her to change it. She refused to amend the letter and told him that it was wrong of her to have written it in the first place and that she regretted having done so.

62. Dr Henry told the Committee that she valued integrity very highly and that she was deeply ashamed that she had been prepared to write the dishonest letter. The Committee heard several testimonials from people who had worked with or studied alongside Dr Henry, who all

attested to her skill as a veterinary surgeon and that they had no concerns about her integrity and honesty. She self-reported her actions from January to the RCVS and from the outset admitted the facts of the charge. During the hearing, Dr Henry submitted that her action of dishonest false certification amounted to disgraceful conduct in a professional respect.

63. The Committee stated that *“in this case, the aggravating features were limited and the mitigating factors extensive. There was no premeditated dishonesty or financial gain involved, there was no actual harm or risk of harm to an animal or human and this was a single incident in an otherwise unblemished 13-year career. The Committee found that the shame and remorse expressed by Dr Henry were entirely genuine. Her conduct on this occasion was entirely untypical of her practise”*

64. After careful consideration, the Committee concluded that the substantial mitigating features permitted it to take the somewhat unusual course of issuing a reprimand in a case involving dishonesty. In taking this course, the Committee attached significant weight not only to the isolated nature of the event but also to the genuine insight shown by Dr Henry and the lasting impact this event has had upon her. In the Committee's assessment, a reasonable and fully informed member of the public would, in this particular case, regard a reprimand as a sanction which protected the public interest in the profession and upheld its standards.

65. The full decision can be found here: [Henry, Louise, Decision on Finding of Facts, Disgraceful Conduct and Sanction - Professionals \(rcvs.org.uk\)](https://rcvs.org.uk/decisions/Henry-Louise-Decision-on-Finding-of-Facts-Disgraceful-Conduct-and-Sanction-Professionals)

Sue Dyson

66. The hearing in relation to the conduct of Sue Dyson took place between 12 to 13 November 2020 and then 28 June to 9 July 2021. The allegations against her concerned her conduct in late 2018, relating to a chain of dishonest statements and actions, including fabricating a letter from a fictitious Home Office Inspector, in order to have her research.

67. At the outset of the hearing, Dr Dyson admitted that she had written and sent the letter and that its contents were misleading and risked undermining a Government system designed to promote animal welfare and research ethics, but denied that her actions in doing so had been dishonest, claiming she had amnesia. Dr Dyson also denied that she had made dishonest and misleading remarks to colleagues in meetings and correspondence leading up to the letter being sent.

68. The Disciplinary Committee heard that in 2018, Dr Dyson was employed as Head of Clinical Orthopaedics at the Animal Health Trust (AHT). Having previously been given the go-ahead by the AHT's Clinical Research Ethics Committee for her research project 'Influence of rider: horse body weight ratios on equine welfare and performance – a pilot study', Dr Dyson completed the project in autumn 2018 and proposed to publish the results in the *Journal of Veterinary Behaviour: Clinical Applications and Research*.

69. After peer-reviewing the project paper at the request of Journal Editor Karen Overall, Dr Matthew Parker, a Senior Lecturer in Behavioural Pharmacology at the University of Portsmouth, was concerned by the lack of a Home Office licence and asked for details of the licence or an explanation of why the project didn't need one, and for the paper to be re-submitted.

70. In reply, Dr Dyson then emailed Ms Overall stating: “We have a former Home Office Inspector on our AHT Ethical Committee and two current licence holders (Named Veterinary Surgeons) who are fully conversant with the current legislation... I also sought informal advice from a current Inspector. All were fully aware of the protocols to be employed and gave me assurance that in their opinion Home Office approval would not be required”. Ms Overall then asked Dr Dyson to obtain a letter from the Home Office to support this position.
71. On 24 December 2018, Dr Dyson sent Ms Overall a letter purportedly from a Home Office Inspector called Dr Butler who, she explained, had advised her during the planning phase of the project. In the letter, the fictitious Dr Butler confirmed that their advice was sought for the project and that in their opinion, a Home Office Licence was not required.
72. Ms Overall then sent the ‘Dr Butler letter’ to Dr Parker for further review, who decided to contact Dr Martin Whiting, Head of Operations at the Home Office Animals in Science Regulation Unit (ASRU) to ask if he knew of Dr Butler.
73. Dr Whiting subsequently confirmed that the Home Office had no record of employing a Dr Butler as an Inspector and that they were in the process of making further inquiries into the matter.
74. After Dr Whiting’s response was forward to Dr Dyson, she replied to him stating that she thought the studies’ procedures did not meet the criteria for the Animals (Scientific Procedures) Act (ASPA), but that this was questioned by peer reviewers. She said that her decision to send Dr Butler’s letter was one that she would ‘eternally regret’ and that she was ‘an inherently honest person’. She explained that she was under a huge amount of pressure in her personal and professional life and that she was ‘fully aware that [she] acted completely inappropriately and she requested the incident be overlooked’.
75. On 1 March 2019, Dr Dyson sent a letter to William Reynolds, Head of the Home Office ASRU, in which she expressed remorse for writing the ‘Dr Butler letter’. Mr Reynolds subsequently raised a concern with the RCVS about Dr Dyson’s alleged behaviour.
76. Dr Jane Downes, who chaired the Disciplinary Committee, and spoke on its behalf, said: “The Committee heard from Dr Dyson that she had no recollection of several events detailed in the charge, including writing the letter from Dr Butler and sending the email to Ms Overall which contained Dr Butler’s letter. She accepted that the letter was dishonest and that it should not have been sent. However, she also claimed that, as she could not remember writing the letter, she did not act dishonestly.
77. The Committee heard testimonials from several witnesses who held Dr Dyson in high regard, including colleagues from the AHT, who attested to her integrity. However, there were many dubious claims made by Dr Dyson throughout the hearing, including that the Home Office Inspector that she referenced as ‘my friendly inspector’ was someone who could have given informed consent to a project as Dr Dyson confirmed that she had met the individual briefly, around two and a half years ago at a drinks reception.
78. In reaching its decisions, the Committee considered Dr Dyson’s previously impeccable character, the written and verbal testimonies from witnesses. They also considered that during the hearing, Dr Dyson explained that at the time she fabricated the letter, she was under a lot of work and personal pressures, including managing a workload amidst

colleagues' resigning or going on maternity leave and it being the anniversary of her dog having to be humanely destroyed. However, it did not accept Dr Dyson's claims that she had amnesia at this time, and considered that she had not owned up to her wrongdoing until it was discovered. Although Dr Dyson maintained her actions were not pre-meditated, the Committee considered that, in the case of the forged letter, a certain amount of planning and careful thought was involved. The Committee believed that Dr Dyson knew what she was doing at the time, but acknowledged she may subsequently have blanked out what she did.

79. The Committee found all but one of the allegations proved and confirmed that it "was satisfied that the writing and sending of that letter was the culmination of a course of dishonest conduct."

80. The Committee found that Dr Dyson's conduct had breached parts of the RCVS Code of Conduct and amounted to serious professional misconduct.

81. Dr Downes continued: "The Committee determined that it was important that a clear message be sent that this sort of behaviour is wholly inappropriate and [was] not to be tolerated. It brings discredit upon Dr Dyson and discredit upon the profession. For whatever reason, Dr Dyson chose not to respond to Ms Overall's email on 30 November 2018 in an honest and straightforward way. Instead, she lied about the makeup of the AHT Ethical Committee in order to cloak her response with authority. She also lied about having received advice from a current Inspector for the same reason.

82. "In the Committee's view, she made a conscious decision to provide a dishonest response. She no doubt believed that would be the end of the matter. When that did not work, she lied further in the email to her co-author, Andrew Hemmings, claiming to have a letter from her friendly Inspector. When that too did not work, she impersonated a Home Office Inspector in creating the 'Dr Butler letter'. She then added a false declaration to the manuscript, which she subsequently submitted to the Journal along with an email containing yet further lies.

83. "That was all done in a blatant and wilful attempt to deceive Ms Overall... into believing the contents of the correspondence to be true, that confirmation a Home Office Licence was not required had been obtained and all was therefore well with the submitted manuscript.

84. "There was no rush, or urgency to have the paper published and the actions were not done in a moment of panic. No doubt she had not planned the entire course of events in advance, but instead reacted to each new obstacle that came her way, but her overall course of dishonest conduct spanned over three weeks.

85. The Committee was well aware of the impact and ramifications for Dr Dyson of any decision to remove her from the Register but had to weigh her interests with those of the public. In doing so it took account of the context and circumstances of the case, all matters of personal mitigation, as detailed above, Dr Dyson's undoubted distinguished international career and reputation and the need to act proportionally.

86. The Committee concluded that *"for all the reasons given above, the Committee was of the view that the need to uphold proper standards of conduct within the veterinary profession, together with the public interest in maintaining confidence in the profession of veterinary surgeons, meant that a period of suspension would not be sufficient and that the only*

appropriate and proportionate sanction in all the circumstances of this case was that of removal from the Register.”

87.The full decision can be found here: [Dyson, Sue, Decision of Finding of Facts, Disgraceful Conduct in a Professional Respect and Sanction - Professionals \(rcvs.org.uk\)](https://rcvs.org.uk/Conduct-in-a-Professional-Respect-and-Sanction-Professionals)

Laura Padron Vega

88.On 21 July, the Committee met to hear the resumption in Ms Padron Vega’s application for restoration. The original application was held on 8 and 9 December 2020.

89.In December 2018, Ms Padron Vega was removed from the Register following an investigation into her actions whilst working as an Official Veterinarian (OV).

90.At the original restoration application hearing in 2020, the Committee decided that Ms Padron Vega’s application should be adjourned for six months to allow her to prove to the Committee that it was appropriate to restore her name to the Register. The basis for this decision was that the Committee had concerns about her keeping up-to-date with the knowledge and skills needed to return to practice, in particular in the area that she had suggested she wished to work in.

91.At the most recent hearing, Ms Padron Vega sought to address the concerns that the Committee had raised about her professional development.

92.In addition to the documentation she provided in her original restoration hearing, which included positive testimonials from colleagues, she provided evidence of her continuing professional development (CPD) since that last hearing.

93.This included a letter from her previous employer, who confirmed she had more recently worked for them as a Certification Support Officer from February to March 2021, where they received positive feedback on her conduct.

94.The documentation also included a letter from another practice confirming that Ms Padron Vega had been offered a position of employment with them, and a separate letter from practice veterinary surgeon, Dr Khan MRCVS, confirming that he would be her mentor.

95.Dr Khan also confirmed that she had been coming to the practice for work experience and he considered her to have good working knowledge of current medicines used within the practice. He further outlined in his letter what CPD support the practice would be providing for Ms Padron Vega as part of her employment with them.

96.An additional piece of evidence was a testimonial from Dr Max Rutana MRCVS, who worked with Ms Padron Vega from September to November 2018. He confirmed that Ms Padron Vega had worked unsupervised for a period of three weeks, and that he found her clinical notes during this period to be satisfactory and they received no complaints about her conduct from clients.

97.Ms Padron Vega also submitted CPD documentation which confirmed she has taken a Certification Support Officers’ course and examination in mid-December 2020.

98. In response to questions from the Committee about her small animal practice experience and how long she had been shadowing Dr Khan for, Ms Padron Vega explained that she had completed 80 hours of shadowing with Dr Khan and that in her future employment under his mentorship, he would be available to support her. She also explained that her job offer was evidence that she would continue to be trained in the relevant area of veterinary work.
99. Dr Khan who provided reassurance of Ms Padron Vega's continued professional development with his practice and the ongoing supervision that she would be under. He explained that the supervision would last at least three months.
100. The Committee concluded that Ms Padron Vega accepted the findings of dishonesty that were made against her at the original Inquiry hearing.
101. In her Reflective Statement, Ms Padron Vega acknowledged that veterinarians have a professional responsibility to ensure the integrity of veterinary certification, that she is now aware that when signing documents as a veterinary surgeon they need to be approached with care and accuracy.
102. The Committee concluded that they were confident that Ms Padron Vega is unlikely to repeat the conduct which resulted in her removal from the Register.
103. Consequently, the Committee decided that she should be restored to the Register.
104. The full decision can be found here: [Padron Vega, Laura, Decision of the Disciplinary Committee on the Application of the Applicant for Restoration to the Register - Professionals \(rcvs.org.uk\)](https://www.rcvs.org.uk/disciplinary-panels/decisions/2021/09/padron-vega-laura-decision-of-the-disciplinary-committee-on-the-application-of-the-applicant-for-restoration-to-the-register-professionals)

Upcoming DC's

1. There are 2 Inquiry's that have been listed to take place:
 - 15-19 November 2021
 - 10-28 January 2022
2. There are 2 other Inquiry's to be listed and the Clerk is currently working to list these as soon as possible.



Summary	
Meeting	Practice Standards Group
Date	15 April 2021
Title	Minutes of meeting
Summary	Minutes of the Practice Standards Group meeting held on Thursday 15 th April 2021.
Author	Amanda Radford PSS Officer a.radford@rcvs.org.uk / 0207 202 0753

Classifications		
Document	Classification ¹	Rationales ²
Minutes	Unclassified	N/A

PRACTICE STANDARDS GROUP

Minutes of the meeting held 15th April 2021.

Members

Mandisa Greene	Chair & RCVS Council
Adam Mugford	BAVECC
Andrew Parker / Anna Judson*	SPVS
Louise Northway	BVNA
Tim Mair	BEVA
Mark McLaren	Lay member
Krista Arnold	BSAVA
Daniella Dos Santos	BVA
Martin Smith	BVHA
Andrea Jeffery*	RCVS VN Council
Stuart Saunders	VMG
Nicky Bowden	BCVA

In attendance

Lisa Price	RCVS Head of Standards
Lily Lipman	RCVS Senior PSS Manager
David Ashcroft	PSS Lead Assessor
Laurence Clegg	RCVS Senior PSS Officer
Eleanor Ferguson	RCVS Registrar
Amanda Radford	RCVS PSS Officer

*Denotes absence

Welcome and introductions

1. The Chair welcomed Nicky Bowden to the group as the new BCVA representative and welcomed back Louise Northway (BVNA).

Apologies for absence

2. Apologies were received from Andrea Jeffrey (VN Council) and Anna Judson (SPVS).

Declarations of interest

3. None

Minutes and actions of previous meeting

4. The minutes of the previous meeting were approved.
5. It was noted that a limited number of Core and Legislative edits had been released in April, with the rest due to follow by the end of May.
6. Regarding the action for the Senior PSS Officer to investigate the implementation of the use of questionnaires for practices to fill out when joining and leaving the Scheme, the Senior PSS Officer and Senior PSS Manager have met with the Head of Insight and Engagement to discuss surveys for the Scheme in general. The Head of Insight and Engagement has advised that rather than having a questionnaire for leavers, we would just need to record the reasons for leaving. It was also advised that multiple surveys could be utilised throughout the assessment process to collect the most relevant data at the appropriate stage. The Senior PSS Officer and Senior PSS Manager are due to review the content of the general survey to establish what data should be captured, and they will then discuss this further with the Head of Insight and Engagement.
7. Regarding the action for the Chair to respond to a request from ICC/ISFM to be represented at PSG the Chair has written to them informing them of PSG's decision to maintain its membership but offering the opportunity for the group to feedback to PSG on particular topics as and when relevant. So far there has been no feedback.
8. The Chair confirmed that all other actions from the last meeting had been completed.

PSS Update

a. Membership and Awards and Top 10 Deficient Requirements

Memberships

9. The Senior PSS Officer explained there were 3,711 practice premises in the Scheme in total as of 25 March 2021, up from 3,699 at the last meeting of PSG in January 2021. This was a net increase of 12 between those that had joined and those practices that had left. It was explained that 38 practices had joined the scheme and 26 had left. The practices had all left due to site closure.
10. The Senior PSS Officer stated that the species breakdown of membership included a comparison between PSS and non-PSS practices. The figures showed that for Small Animal, Farm, and mixed practices the majority are PSS members. However, for Equine practices there are more non-members, and it was suggested that the Group might therefore want to address this.
11. It was explained that GPSA level was the most accredited level for practices with the increase being in proportion to increases in membership figures. There was a decrease in Core level, but this was seen as being due to more practice premises receiving upgrades to GP accreditation.

Action: The Senior Manager and Senior Officer to look at how to approach this discrepancy with Equine practices

Awards

12. The Senior PSS Officer discussed that as of 25 March 2021 there were 279 premises that have gained 443 Awards, an increase of 6 premises with awards from the last meeting of PSG in January 2021. It was explained that the increase in premises with Awards during this time where no awards activity is being undertaken was due to processing of the data for awards assessments held before the pandemic.
13. The Senior PSS Officer explained there had been increases in most individual Awards, only the Small Animal ESC had seen a decrease, and this was due to the closure of some premises within a national out of hours provider.

PSS feedback survey results

14. The Senior PSS Officer updated the meeting with regards to surveys/questionnaires. A small sample size had been used with the 12 responses received. Feedback was very positive with the assessor team and officer team rated highly. The customer satisfaction score from the survey is also above average. Results showed practices mainly join PSS to use the framework to improve the running of the practices.
15. The Group queried what the response rate for the survey was and the Senior Officer stated that around 200 practices were sent the survey, so the response was around 5%. The Head of Insight and Engagement had advised that a response rate of 10% was good, and the Group was advised that under normal circumstances (pre-covid) our response rate was closer to this.

16. The PSS Team confirmed that work was underway to review and update the PSS survey, in collaboration with the Head of Insight and Engagement.

Top 10 deficiencies

17. The Group was advised that for the medicines assessment deficiencies there was a comparison of the data collected for January-March 2021 to that for October-December 2020. All assessments during these periods were carried out remotely. With Small Animal there had been an increase in deficiencies for the following medicine requirements:

- 10.1.2, a record of the premises and other places where medicines are stored/kept must be available
- 10.1.4 Medicines must not be available for self service except those with AVM-GSL category. Medicines must be stored in areas not accessible to the public
- 10.1.21 Veterinary medicinal products must be supplied in appropriate containers

but a decrease in:

- 10.1.24 Medicines must be used in accordance with the legislation commonly referred to as the Cascade
- 10.1.25 Consent for products supplied under the Cascade is required
- 10.1.26 A suspected adverse event or lack of efficacy to a veterinary medicine must be reported promptly to the VMD and/or manufacturer.

In general, it was shown that the deficiencies arising were mainly associated with obtaining documents prior to assessment.

b. Standards Update

18. The Head of Standards provided an update on the COVID guidance to the profession following the lifting of some COVID restrictions. It was explained that with the easing of the lockdown from 12 April 2021 the temporary guidance had moved away from the flow charts in the Covid FAQ's on the RCVS website. As practices were starting to return to normal, vets are being asked to use their professional judgement on what work they can carry out and are advised to adhere to government guidance on social distancing etc., however, if this was to prove difficult then they should carry on providing remote services i.e. remote prescribing.
19. The Group was informed that a document collating information looking at common medicines pitfalls was put to the Standards Committee to consider. The document was approved and has been added as

an FAQ section within Chapter 4 of the Code of Conduct. It was also published on the RCVS website. The document will also be used by PSS assessors for sending to practices ahead of PSS assessments.

20. The Standards Committee has met twice since the last PSG meeting and Council met in January, shortly after the meeting of PSG in January. Council has agreed the ESC Equine Accreditation, RVNs as assessors and the change in the PSS Rules regarding timing of an initial medicines assessment to be within 12 months of acquisition.

c. Practice Standards and sustainability

21. The Senior PSS Officer informed the Group that the last Environment and Sustainability Working Party meeting (a working party for the Advancement of the Professions Committee (APC)) was held on 2 March 2021 and discussed how PSS could be used as a tool to improve sustainability in the profession.
22. The Group were informed that the main focus of the Environment and Sustainability Working Party was on what capacity PSS could measure sustainability, whether as an Award or as a requirement. Discussions are ongoing regarding who should advise on this and it is likely a proposal will be brought to the next PSG meeting to utilise PSG members' expertise. The Environment and Sustainability Working Party had been reminded that two new requirements were included in the new version of the Standards; one of these at GP level requires the practice to have a sustainability policy, and the other at Awards level requires the practice to measure waste reduction.

Action: Senior PSS Officer to send round the two new sustainability requirements to the Group

d. Lead Assessor update

23. The Group was informed that the assessors were well into the process of catching up on outstanding assessments and should be fully caught up by May 2021. It was confirmed that over 500 remote assessments have now been completed in the last three months.
24. The Lead Assessor advised that there are currently 22 assessors with three proposing to step down later in the year. The PSS team will therefore review the capacity and expertise requirements of the Scheme and begin an appropriate recruitment plan.
25. As part of its quality assurance measures, the VMD have shadowed one remote assessment with at least two more to follow.
26. The Lead Assessor informed the Group that there had been assessor training this week where they critically reviewed current assessments, with a view to improving consistency in the assessment experience for the practices. The training day also included a mental health talk from Lisa Quigley of Mind Matters and from PSS Assessor Richard Killen on Vet Life.
27. The Lead Assessor stated that he was delivering a webinar and drafting an article on the new version of the Standards for BSAVA Companion publication. He also stated that on a personal note the last three

months had been very interesting and rewarding. The PSS team were thanked for their help and support.

Remote Assessment Plan

28. The Group was reminded that the discussions here were confidential.
29. The Group were informed that the Head of Standards, Lead Assessor and Senior PSS Manager had spoken to the VMD regarding the plan for PSS assessments. There had been discussions on the differences in the relationships PSS and VMD had with practices, given that PSS is a voluntary scheme. It was recognised that RCVS in-person assessments were longer than the VMD's medicines inspections and often held in enclosed spaces, which increased Covid transmission risk.
30. The Senior PSS Manager stated that there were no plans to carry out a 'hard start' with in-person assessments and plans would obviously be informed by the Government guidance. The first in-person assessments will be routine and allocated from July 2021. With the usual 3-month notification period this will result in the first actual in-person assessments being carried out in October 2021 at the earliest. The next RCVS/VMD meeting on this matter is scheduled for 26th April 2021.
31. The Group were informed that there was no immediate pressure from the VMD to return to in-person assessments and the intention was to seek input from the Major Employer's Group (MEG) / Federation of Independent Veterinary Practices (FIVP) on any practice issues that may require further consideration during the transition from remote to in-person assessments. It was clarified that this would not be a formal consultation on the decision to resume in-person assessments and the decision on the format of assessments rests with PSG.
32. The Group discussed the suggestion of asking for volunteers to be the first practices to have in-person assessments stating that the return to in-person assessments might impact heavily on smaller practices with fewer resources and questioned whether there was time in the timeframe to do this. It was suggested that perhaps there should be a combination of assessments, some remote and some in-person a 'hybrid' format.
33. It was suggested to the Group by the Registrar that with the return to in-person assessments there would be the opportunity to learn lessons and there will be scope to retain some elements of the remote assessment process that had worked well. On this point, the Lead Assessor also commented that there had been feedback from the assessor team about the assessment process being made more efficient with some additional documentation being uploaded pre-assessment, and there was a desire to maintain this with in-person assessments.

Action: The PSS team to consider what, if any, elements of the remote assessment format should be retained once the Scheme returns to in-person visits, and to revert back to PSG for further discussion.

34. The Group was asked to vote on:

- To agree to the continuation of the remote routine assessment format until October 2021
- To agree that should the government roadmap allow, the return to in-person assessment allocations should begin in July 2021, with the usual 3-month preparatory period given
- To consult with MEG and FIVP on the proposal for returning to routine in-person assessments; and
- To agree the resumption of high-risk in-person assessments from April 2021.

35. All members of the Group voted for each point unanimously.

Matters for Decision

a. Timeframe for launch of edits to Practice Standards

36. The Senior PSS Officer reminded the Group of the revised timeframes for the launch of the new version of Practice Standards that had been agreed at the January 2021 meeting. The new version of Practice Standards had been pending for two years now since March 2019 and had originally been due for release in June 2020 but was delayed due to the coronavirus pandemic.
37. The Group was asked to confirm the release of the edits in May 2021 in line with the Government roadmap when restrictions are relaxed further. This would be with a view to assessing the new version of the Practice Standards in line with the return to in-person assessments in October 2021, therefore giving practices sufficient time to adapt.

Decision: The Group agreed that the full version of the edits were to be released in May 2021 in line with Government roadmap, with a view to the new Practice Standards being assessed from October 2021 in line with the return to in-person assessments.

Action: Senior PSS Officer to deliver the project to publish the new version of the edits in May 2021.

b. Quality Assurance of remotely assessed new and upgraded accreditations

38. The Senior PSS Manager stated that this decision had come from the previous PSG meeting when queries were raised relating to the adequacy of remote assessments for initial applications and upgrades. PSG had agreed that there should be additional checks.
39. The Group were informed that the Senior PSS Manager and Lead Assessor had discussed the introduction of enhanced spot checks which could be amalgamated into the usual spot check system and carried out within 18 months of the remote assessment. It was explained that the format would be as practical as possible, with some documentation required beforehand so that on the day more time could be spent interacting with the practice team. The spot check would not repeat the process of the remote assessment. It was confirmed that practices would be given more than the 48-hour notice that was usually given for a spot check as there would be some preparation required.

40. The Group was advised that as the enhanced spot check would fall under the usual quality assurance process for the Scheme, all practices that had had initial assessments or upgrades since October 2020 would be included, rather than only those to which the need for an additional quality check had been communicated.

Decision: The Group agreed to the introduction of enhanced spot checks within 18 months of a remote assessment being carried out

c. Awards Assessments

41. The Group was reminded that Awards assessments had originally been suspended as it was felt they did not lend easily to a remote format. So as not to put pressure on the practices during lockdown it was decided to suspend and extend the awards for 12 months. The 12 months expired in March 2021 and the Group were asked to agree a 6-month extension to the original 12-month extension for awards re-assessment dates, to coincide broadly with the current planned return to in-person assessments in October 2021.

Decision: The Group approved to extend the Awards re-assessment dates by a further six months

Action: Senior Manager to notify IT of this extension so that the practice records can be updated

d. Radiation Protection Adviser (RPA) Requirement

42. The Lead Assessor informed the Group that practices are increasingly struggling to meet the requirement 5.2.6 of the Small Animal Diagnostic Imaging (GP) Module. Although not a legal requirement, this requirement states that practices must be visited by an RPA every four years to check equipment with the understanding that they also check new equipment and any equipment that has moved premises on an ad hoc basis. Currently these checks are being carried out remotely or in the form of self-certification, a process started pre COVID, and RPAs have generally reduced the number of in-person visits. Practices have therefore been stating they are finding it difficult to get RPAs to visit as often as the requirement states.
43. The Lead Assessor stated he had sought the opinions of consultant RPAs on this matter, and they supported removing the requirement.
44. The Group discussed the requirement and the need for keeping or changing it. Concerns were raised about removing the requirement altogether, particularly for Equine practices who report that the HSE are interested in investigating radiography in particular. radiation safety. It was agreed that more background information is needed from BEVA as to what concerns the HSE may have regarding radiology and any difficulties equine practices may have in this regard..

45. The Chair confirmed that the requirement should be kept but there could be guidance put in place stating that if a practice could not obtain the required evidence, then evidence from the RPA stating they will not be visiting should be sufficient, allowing for more flexibility. The Registrar agreed that we would need evidence confirming that the RPA was not visiting.

Decision: The Group decided to keep requirement 5.2.6 in the Standards but it was agreed that the PSS assessor team could accept statements from RPAs advising that they would not visit practices as evidence for this requirement in the meantime.

Action: The Lead Assessor to gather further information, including contacting HSE if needed, and to bring this back to the Group at the next meeting.

Matters arising

46. There were no matters arising.

Risk and equality register

47. It was raised that the discussions on the return to in-person assessments and those around the RPA requirement could be a risk to the Scheme and should therefore be added to the PSS Risk Register.

Any other business

48. The Group were informed that following the cancellation of the virtual Awards ceremony, which had been arranged for December 2020 in place of an in-person ceremony, the RCVS had produced some resources to recognise and celebrate the practices that were due to receive their Awards. This included a congratulatory video from the Chair, a listing of the practices on the RCVS website, and complimentary promotional materials.
49. The Group was updated on an ongoing problem with a number of practices having overdue evidence for their assessments. It was suggested to the Group that more actions needed to be available to the PSS team and the Review Group to address this. It was suggested that perhaps the VMD model should be followed where the re-assessment cycle is reduced, or we could look at reducing a practices accreditation level. The Senior PSS Manager stated that we were not yet at the stage to present a paper to the Group but the PSS team would gather further information and bring this matter back to the Group at a later date.

Action: Senior PSS Manager to look at outstanding evidence statistics and bring back to Group at the next meeting

50. The BAVECC Representative reminded everyone that the language around PDP was changing with its replacement by vetGDP and that this would need to be reflected in the new version of the Standards.

Action: Senior Officer to update the PDP wording in the new version of the Standards to refer to vetGDP instead.

Next Meetings

- 16th August 2021
- 18th October 2021

Summary	
Meeting	Standards Committee
Date	13 September 2021
Title	Practice Standards Scheme Update
Summary	A summary of the changes to the Practice Standards Scheme ("PSS")
Decisions required	None
Attachments	Annex A – April 2021 PSG Minutes
Author	Lily Lipman Senior Manager Practice Standards Scheme L.lipman@rcvs.org.uk /020 7202 0756

Classifications		
Document	Classification ¹	Rationales ²
Paper	Unclassified	
Annex A	Unclassified	

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

PSS assessments

1. The remote PSS assessment format has been utilised since October 2020. There have now been in the region of 1,300 completed remote assessments since then. This schedule has enabled the PSS team to catch up with all overdue assessments accrued due to the pandemic and we are now back to the usual monthly allocation amounts.
2. The PSS team have sought, and been provided, permission from the VMD to continue remote assessments until the in-person October allocations.

Awards

3. All practices with awards were granted extensions to the duration of their awards to October 2021, as the awards do not lend themselves to the remote assessment format. From this point forwards the usual four-year interim period will apply once again.

Membership

4. As of 29th July 2021, there were 3,793 practices in the Scheme in total (including candidates), up from 3,711 as of the last meeting of PSG in April 2021. This represents 68.01% of all eligible RVPPs (5,577 total eligible veterinary practice premises; up from 67.25% as of the April 2021 meeting).
5. The Committee is advised that this is a net increase between practices joining and leaving the Scheme. In total, 125 premises joined the Scheme during this period, and 43 premises left the Scheme. 39 of the premises that left were due to closures of the premises and one was due to change of ownership of the premises. The other three were withdrawal requests.

Edits

6. PSG agreed the publication of the new version of the PSS Standards was to be completed in May 2021. This was to give practices due time to absorb the coming changes in time for implementation of the new version of the standards in the October allocations. As yet, there have been no major items for feedback or clarification requests from the professions. It is expected that more feedback will be provided from the assessor team and practices after the roll out of the new edits in October, which will be taken to PSG for discussion as appropriate.

Previous PSG Meetings

7. PSG met on 15th April 2021 and 16th August 2021. Minutes for the April meeting may be found at Annex A, with the minutes for the August meeting to be ratified at PSG's next meeting.