



RCVS

Royal College of Veterinary Surgeons

Review of the Veterinary Surgeons Act

A consultation on the future regulation
of the veterinary profession

February 2003

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Dear Colleague

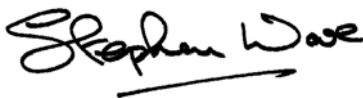
We are consulting members on one of the most important issues to face the veterinary profession in recent years. This paper seeks your views on a range of important questions about the future of the Royal College of Veterinary Surgeons and the way in which the veterinary profession regulates itself. The main issues concern:-

- the composition of the RCVS Council;
- the arrangements for the supervision of professional conduct;
- the definition of veterinary surgery (which determines what lay people may do and what is reserved to a veterinary surgeon);
- the financing of the activities carried out by the College under the Royal Charter; and
- the regulation of veterinary nurses and other paraprofessionals.

These are crucial issues which concern the future of veterinary medicine as a self-regulating profession.

Most of the College's activities are carried out under the Veterinary Surgeons Act 1966. The Act is out of date, and the Government is expected to introduce new legislation within the next two or three years. The profession needs to be prepared for any introduction and decide what improvements it wants in the statutory framework. A new Act will also provide an opportunity to make changes in the light of the recommendations of the RCVS Education Strategy Steering Group.

The RCVS Council has not yet taken a view on what changes would be desirable. Before doing so it wishes to hear what the profession thinks. We would welcome comments from individual veterinary surgeons and from veterinary organisations on any of the issues raised in the paper, and in particular on the questions which are listed in the annex.



J S Ware BVM&S MRCVS
President

Please send your response by **4 April 2003**, preferably by e-mail (consultation@rcvs.org.uk). This paper, including the questions in the annex, can be downloaded from the RCVS website, www.rcvs.org.uk. Alternatively write to Jeff Gill, External Affairs Department, Royal College of Veterinary Surgeons, Belgravia House, 62-64 Horseferry Road, London SW1P 2AF (telephone 020 7202 0735, e-mail j.gill@rcvs.org.uk).

REVIEW OF THE VETERINARY SURGEONS ACT

Introduction

1. Most of the powers and duties of the Royal College of Veterinary Surgeons are derived from the Veterinary Surgeons Act 1966. The Act is out of date in many respects. It fixes the composition of the RCVS Council, with no flexibility to make changes in order, for example, to increase lay representation. The Preliminary Investigation and Disciplinary Committees need greater independence and more flexible powers to supervise professional conduct. The provisions of the Act on registration entitle the holder of an approved veterinary qualification to be registered forthwith and thereafter to give any treatment to animals of any species, with no requirement to keep their knowledge and skills up to date. There is no power for RCVS to regulate the conduct of veterinary nurses and other veterinary paraprofessionals. For these and other reasons a new framework is needed, preferably with scope for revision over the years in response to changing views and needs.
2. The Government has brought about major changes in the regulation of virtually all of the other professions in response to changing social expectations, insisting on more effective and transparent mechanisms for protecting the interests of the public. It is now the turn of the veterinary profession to come under the spotlight. The Department for Environment, Food and Rural Affairs (DEFRA) is expected to consult this year on proposals to modernise the Act, as was indicated by Lord Whitty in an answer to a parliamentary question on 30 July 2002. DEFRA has also indicated the intention to introduce new legislation at the first opportunity which probably arises from 2004 onwards. The Department has a particular interest in removing obstacles to the fuller use of paraprofessionals.
3. RCVS has not yet taken a view on changes which would be desirable in the Act and wishes to hear the views of the profession. This note builds on preliminary work by an RCVS Working Party and on a policy paper, A Broader Strategic Vision, adopted by the RCVS Council in November 2000. The note also takes account of recent legal advice on the implications of the Human Rights Act 1998 for the regulation of professional conduct.
4. Comments are invited by **4 April 2002** from individual members and veterinary organisations on any of the issues raised in this paper. A number of questions are raised in the course of the discussion and also listed in the annex, but respondents are welcome to offer views on matters which are not covered by specific questions.

The composition of the RCVS Council and electoral arrangements

5. The regulatory body of any self-governing profession has to combine two roles. Self-regulation means that it represents the profession's own values and standards and takes steps to ensure that individual members observe them. The regulatory body must also, however, act as the guardian of the wider public interest, whether or not this coincides with the immediate interests of individual members of the profession. In the case of RCVS this wider role means considering the interests of clients, patients, veterinary surgeons and the public at large.
6. The Government has called for the self-regulatory bodies for the clinical professions in the human health field to be smaller, with much greater patient and public representation in

their membership, to have faster, more transparent procedures, and to develop meaningful accountability to the public.

7. The RCVS Council currently consists of 40 people:
 - 24 elected by the members for a term of four years, with an election each year to fill six places;
 - four appointed by the Government. Normally one is the Chief Veterinary Officer and the other three are lay members (ie have no veterinary qualification);
 - two appointed by each of the six UK universities with veterinary schools.
8. There are a number of factors to take into account in deciding how many members the governing body of an organisation should have. The Council of RCVS needs to include people representing a range of experience and points of view, and there need to be enough members to share the Committee workload. On the other hand, it can be easier for a small Council to develop a collective identity, conduct coherent debates and make rapid decisions. If, as envisaged (see below), the Council representation on Disciplinary Committee is considerably reduced there seems to be no need for a Council with more than 30 members. There is also no reason why people who are not Council members should not be members of committees and sub-committees.
9. Council includes lay members who help it consider issues from points of view other than those of the profession, but the lay representation is small when set against the constitutions being adopted by other professional bodies. The current Government thinking seems to favour around 50% lay members. The Architects Registration Board set up in 1997 has 7 architects and 8 lay members. The accountants have had to accept 60% lay membership of their new regulatory body. Following new legislation the Council of the General Medical Council will be reduced in size from 104 members to 35 and lay membership increased from 25% to 40%. The Health Professions Council which now regulates the activities of twelve health care professions other than medicine and nursing consists of 12 lay members and 12 professionals plus a President.
10. Because of the dual roles operated by the College under the Charter and Statute - see paragraph 44 below - there is a good case for arguing that RCVS Council need consist of no more than 25% lay persons, provided some members of Disciplinary Committee are appointed/elected from outside of Council.
11. At the moment lay members are appointed to the RCVS Council by the Government. Other options would be for Council to select lay members for itself, or set up a free-standing selection panel, or for relevant organisations to have power to nominate representatives.
12. At the moment, two thirds of the members other than those appointed by the Government are elected, while a third are appointed by the universities which have veterinary schools. If Council is to be smaller, more transparent and democratic it may be appropriate to reduce the representation of the veterinary schools. There might be a single nominee from the universities collectively, or alternatively one each. Academic members would no doubt continue to seek election to Council as now, and might also be appointed to the Education and Specialisation & Further Education Committees without being members of Council (as they are already appointed to specialist boards).

13. RCVS regulates the training of veterinary nurses, acting through the Veterinary Nurses Council. Two members of the RCVS Council might be elected by veterinary nurses from their number.
14. Turning to electoral arrangements, the system of rolling elections to Council, with six places being filled each year, serves to give continuity. It could also be said to discourage dramatic innovation. The arrangement reflects the fact that the elections are fought by individuals, not political parties. By contrast the House of Commons is elected en bloc, but general elections are mainly about which party should form the next Government rather than the merits of individual candidates.
15. The electoral system for Council members could be changed to ensure a balance of professional interests or geographical distribution, with electoral constituencies based on type of work or geographical area. Currently 62% of members eligible to vote reside in England, 20% overseas, 10% in Scotland, 4.2% in Wales and 3.5% in Northern Ireland.
16. Currently the Officers of RCVS are elected by the Council rather than the profession. This follows the parliamentary model, where voters elect MPs but do not decide who are to be the Prime Minister and other members of the Government. An alternative would be for the profession to elect the RCVS Officers direct, on the analogy of the election of the President of the United States. On this approach Officers and Council would need to have defined powers and functions, since the Officers would not necessarily command the support of the Council.
17. Under the present arrangement, where Council elects the Officers, there can be difficulty when a Council member elected to be an Officer is not successful in a subsequent Council election. This might be remedied by providing for Council members elected to serve as Officers to have an extended term on Council, in the interests of continuity. This might, however, be thought to be inappropriate or even undemocratic.
18. The Officers are elected for a year at a time. There are arguments for a longer term of office, say three or four years.
19. The Officers other than the Registrar are not expected to work full-time for the College. They may receive compensation for loss of earnings, within limits, but are not paid for their services. The present Officers do not seek any change in this arrangement for themselves, but in principle it is open for debate.

Questions

- (1) What proportion of Council seats should be allocated to non-veterinarians? 25%, more than 25%, or less than 25%?**
- (2) Should organisations representing animal owners, eg the National Farmers Union or the Kennel Club, have a right to nominate members to Council? If so, which organisations?**
- (3) Should the six UK universities with veterinary schools nominate members to Council? If so, should the university representation be one from each university, or one to represent all?**

(4) Should regional elections for Council members be considered, eg with veterinary surgeons resident in the four countries of the UK and overseas voting separately?

Education

20. Council has a duty to supervise pre-registration veterinary training in the UK and may appoint visitors to report on courses of study and examinations for degrees recognised by the Privy Council. There is a rolling programme of formal visitations by teams including experts from the UK, EU and overseas. Visits are made every 7-10 years followed by a report to Council and the Privy Council. A follow-up meeting is normally held two years later to monitor progress made with the recommendations of the original report. The College can also accredit overseas qualifications (outside the EU) and does this by way of visitations or recognition of other countries' accreditation arrangements (eg in Australia and New Zealand via the Australasian Veterinary Boards Council Inc and in North America via the American Veterinary Medical Association). It is not envisaged that there is a need for change in the current arrangements and the College should, therefore, continue to be responsible for overseeing and accrediting the qualifications which are recognised for registration purposes.
21. The present Act takes the simple line that anyone who holds a recognised veterinary degree is entitled to be licensed forthwith to practise veterinary medicine and surgery in respect of any species and for life, without restrictions and with no requirement to keep up to date. The RCVS Education Strategy Steering Group (ESSG) has formulated, in consultation with the profession, a draft strategy which has important implications for registration. Proposals from the ESSG include a post-graduation professional training programme (PTP) followed by licensure to work in a specific area of practice, mandatory CPD, and periodic revalidation. The need for periodic revalidation of professional competence has now been accepted within the health professions and schemes are currently underway.
22. The Act entitles the holders of Commonwealth or foreign veterinary degrees which are not recognised in the UK to be registered, provided RCVS is satisfied that they have the requisite skill and knowledge to practise in the UK. Currently they are required to take the RCVS membership examination for this purpose. It is difficult, however, to test practical skills in an examination of reasonable length. If the proposed professional training programme is adopted for UK graduates, there could be advantage in requiring the holders of non-recognised overseas degrees to undergo a similar training programme, in addition to or perhaps instead of taking the membership examination. Before being admitted to the training programme they would be subject to an initial assessment, which would look for evidence of fitness to practise and language skills.
23. There is a need to regularise the Specialist list and create a regulated Specialist Register so that the use of the "Specialist" title can be better controlled. A new Bill presents an opportunity to seek the power to maintain a formal Register of RCVS Specialists.
24. This paper does not pose any particular questions on the educational remit of RCVS in view of the debate which has already taken place on the ESSG proposals, but comments on any aspect of the subject are invited.

Supervision of professional conduct

25. At present the Act requires the Council to set up a Preliminary Investigation Committee and a Disciplinary Committee. The Preliminary Investigation Committee must carry out a preliminary investigation of every case where it is alleged that a member is liable to be removed or suspended from the Register and decide whether it should be taken further. Disciplinary Committee considers cases referred to it by the Preliminary Investigation Committee and may direct the removal of a member's name from the Register, or the suspension of the member's registration for a specified period, if:
 - the member is convicted of a criminal offence which in the Committee's opinion makes him or her unfit to practise veterinary surgery;
 - the member is judged by the Committee to have been guilty of disgraceful conduct in any professional respect; or
 - the person's name has been entered on the Register by fraud.
26. The disciplinary jurisdiction is specifically concerned with behaviour and fitness to practise. Veterinary surgeons are also subject to the general law relating to contract, negligence and employment, and many of the complaints which come to RCVS concern those areas.
27. Currently all the members of the two Committees must be members of the RCVS Council, and their opinions and values are likely to be broadly representative of those of Council members generally. This is one model of self-regulation: the RCVS Council, a majority of whose members are elected by the profession and which predominantly consists of veterinary surgeons, not only advises them on their conduct but, through its Committees, sits in judgment when misconduct is alleged.
28. An alternative would be for the RCVS Council to confine itself to setting the framework of rules and advice, leaving alleged infringements to be considered by an independent tribunal. Such a tribunal might include veterinary members, able to draw on their own professional knowledge and experience, or the tribunal might consist of non-veterinary members but hear the evidence of expert veterinary witnesses when appropriate. On this model the profession might still be considered self-regulating in that the RCVS Council continued to set the standards, but the question whether a member had failed to observe them would be decided independently.
29. There are grounds for moving some way in the direction of an independent tribunal. The Human Rights Act 1998 requires public authorities to observe the European Convention on Human Rights. Article 6(1) of the Convention says "In the determination of his civil rights and obligations or of any criminal charge against him, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law."
30. In a number of cases the courts have considered what this implies for the disciplinary committees of professional bodies, and RCVS has taken legal advice on whether changes to its legislation are needed in the light of the Convention. Briefly, the answer is that the rules governing the operation of the Preliminary Investigation and Disciplinary Committees already measure up well against the new law in a number of respects, but that some improvements are called for.

31. The main changes recommended by the College's legal advisors to make the system more transparent and independent are:
- no-one should serve on both the Preliminary Investigation and Disciplinary Committees at the same time, even in relation to different cases, and it would also be desirable to exclude members of Advisory Committee. This would formalise existing practice;
 - someone who has served as a member of the Preliminary Investigation Committee should not move on to Disciplinary Committee without a break. This too would formalise existing practice;
 - the President or a Vice-President should not serve as Chairman or Vice-Chairman of the Preliminary Investigation Committee; indeed, it may be better for them not to be members of the Committee;
 - membership of both Committees should be open to people who are not members of RCVS Council;
 - members of RCVS Council should be in a minority on Disciplinary Committee, or perhaps not be members of it at all;
 - Disciplinary Committee should include a significant number of lay members, though not necessarily forming a majority;
 - the RCVS Council should not, as now, select the members of Disciplinary Committee (and probably not of the Preliminary Investigation Committee either). Instead there should be an open and transparent appointment process, open to outside scrutiny and following the principles of equal opportunity and selection based on merit. The members should be appointed for at least three years and not be removed save in exceptional circumstances.
32. Such changes would make the Preliminary Investigation and Disciplinary Committees even more independent of each other and of Council than they are now. The three bodies would have quite distinct functions:
- RCVS Council/Advisory Committee would set standards for members;
 - the Preliminary Investigation Committee would consider allegations that a member had fallen short of those standards;
 - Disciplinary Committee would adjudicate where the Preliminary Investigation Committee decided that there was a case to answer.
33. In order to reinforce its independence and impartiality the Preliminary Investigation Committee could have a membership of twelve (five lay and seven veterinary) and a quorum of five, so that two panels could divide the workload between them if necessary. It would be necessary to ensure that the lay/ veterinary balance on each panel was fair, eg two lay and three veterinary.

34. It would similarly be helpful if the Disciplinary Committee had power to work through two panels in parallel. Each might consist of five members, two being veterinary members of Council, one a veterinary surgeon (probably elected) who was not a member of Council, and two lay persons. The chairman would not be one of the Council members.
35. The formal disciplinary powers of RCVS only allow it to deal with misconduct after it has happened. The Guide to Professional Conduct gives advice, but there is no power for RCVS to make binding rules for conduct. These days a professional regulator is expected to take positive steps to promote good behaviour by laying down rules and monitoring compliance with them. If, moreover, Disciplinary Committee becomes more independent of Council, or wholly independent of it, the RCVS guidance on professional conduct will need to be given formal status in order to ensure that regard is had to it in disciplinary proceedings. As well as the Guide the RCVS might also have power to make conduct rules, the breach of which would almost certainly result in disciplinary proceedings. RCVS ought also perhaps to have power to issue guidance on which criminal offences should be seen as rendering a member unfit to practise.
36. RCVS has only limited powers to dispose of cases where misconduct is alleged or proved. The Preliminary Investigation Committee can only decide whether or not to refer a case on, and the only penalties which Disciplinary Committee may impose are removal or suspension from the Register. It would be desirable to have more flexible powers to deal with misconduct or failure to meet adequate standards, perhaps including the following:
- for very serious allegations only, powers to suspend members during investigations and pending a disciplinary hearing. This would clearly raise difficult issues;
 - power for the Preliminary Investigation Committee to give formal advice or to administer a formal warning by agreement (like a police caution), instead of referring the case to the Disciplinary Committee;
 - power for the Disciplinary Committee to levy fines; formally to rebuke or admonish; to require an apology to be given; to impose conditions, e.g. requiring an individual to be re-trained or receive health care/support, or a practice to rectify deficiencies; to order costs; to order that professional fees should be waived, reduced or refunded; perhaps to award compensation.
37. It is for consideration whether the period, currently ten months, which must elapse before an application for the restoration of a name to the Register should be lengthened. For the medical profession it has been suggested that the period should be five years. There might also be power to restore subject to conditions, for instance requiring supervision of specified activities.
38. The existing arrangement for appeals against removal or suspension from the Register works satisfactorily, but the Privy Council may wish to be relieved of this function when a legislative opportunity is available. All the other professions which traditionally came within the jurisdiction of the Privy Council's Judicial Committee have now made other arrangements for their appeals. The simplest course would be to provide, as they have, for appeals to the Courts.

Questions

- (5) **Should the Preliminary Investigation Committee have powers:**
 - a. **for very serious allegations only, to suspend members during investigations and pending a disciplinary hearing;**
 - b. **to issue a formal warning, by agreement, instead of referring the case to the Disciplinary Committee?**
- (6) **Should the Disciplinary Committee have the wider powers of disposal suggested?**
- (7) **Should a longer period than ten months elapse following the removal of a name from the Register before an application may be made for it to be restored?**

Resolution of disputes on matters other than conduct

- 39. RCVS is often approached by clients who are in dispute with their veterinary surgeon, but not over a matter which raises any question over the veterinary surgeon's conduct or competence (for instance a dispute over fees). It might be desirable for RCVS to be able to refer disputants to adjudication, arbitration or mediation services.

Regulation of veterinary services

- 40. At the moment RCVS regulates individual veterinary surgeons only. There have been many changes in the operation of practice in recent years. Practices are generally much bigger and many are multi-site or a part of a large group. More recently, the advent of corporate owned or large partnership practices has meant in some cases that boards of directors or partners may be making decisions that circumscribe or conflict with the clinical judgement of individual veterinary surgeons. Furthermore veterinary nurses, receptionists and practice managers have increased considerably in number and importance in the day to day running of practice, and some veterinary nurses are partners in practices. RCVS Council has agreed that in future it should have the power to regulate the delivery of veterinary services whether by companies, practices or other organisations and teams of practitioners as well as by individual veterinary surgeons.
- 41. This would mean setting and auditing the standards for clinical practice, for facilities, premises and procedures, and for the ethical conduct of veterinary and other staff. Practices, whether incorporated or not, might be required to appoint a "compliance officer" or named veterinary surgeon who might be held personally responsible in disciplinary proceedings, and RCVS might have powers to monitor premises, standards and compliance with the Guide and conduct rules. The RCVS has set up a Working Party to consider the whole aspect of practice standards. The intention is to set the minimum standards required for all practice and then by adding modules of increasing standards be able to incorporate BSAVA approved, VN training practices and veterinary hospitals into one system.

Scope of acts of veterinary surgery

42. Veterinary surgeons currently have a monopoly, in that the Act prohibits anyone else (with various exceptions) from practising veterinary surgery. The Act says this "means the art and science of veterinary surgery and medicine and, without prejudice to the generality of the foregoing, shall be taken to include—
- (a) the diagnosis of diseases in, and injuries to, animals including tests performed on animals for diagnostic purposes;
 - (b) the giving of advice based upon such diagnosis;
 - (c) the medical or surgical treatment of animals; and
 - (d) the performance of surgical operations on animals."
43. It is for consideration whether any change is needed in this definition, or in the related definition of "animals". The Act says simply that "animals" includes birds and reptiles, but leaves it unclear what else is covered. There is particular doubt about fish, which are expressly included in the definition of animals in the Medicines Act 1968 but not in the Veterinary Surgeons Act. It would seem right for any new legislation to apply to all animals that regularly enter the human food chain or are kept for commercial or sporting purposes or as companion animals.

Questions

- (8) Should the Act apply to all animals, including fish, that regularly enter the human food chain or are kept for commercial or sporting purposes or as companion animals?**
- (9) Can the definition of "veterinary surgery" in the current Act be improved?**

The Royal College function

44. The RCVS was not brought into being by an Act of Parliament but by a Royal Charter of 1848 which has been largely replaced by one of 1967. The Charters do not lay down the role of the College, but they give certain powers and, by giving RCVS an existence independent of the Act, enable it to be more than just the statutory regulator of the profession. In human medicine the General Medical Council carries out the regulatory functions while the Royal Colleges promote the advancement of learning in their specialties and are able to speak for the professional consensus in their particular areas.
45. RCVS performs the Royal College function to the extent that it awards postgraduate veterinary qualifications and distinctions and qualifications for veterinary nurses and helps to support the RCVS Library & Information Service, all under Charter powers. RCVS cannot, however, take on a fuller Charter role because it has no staple source of income for the purpose. The only fees which can be raised under the Charter are specific to Certificates, Diplomas, Fellowships and applications for specialist recognition, and money raised from registration and retention fees can only be used for the functions carried out by RCVS under the Act.

46. The non-statutory activities of the College could be funded more satisfactorily by separating membership of the College from the licence to practise. There could then be a membership fee to cover the cost of Royal College activities and a separate licence fee, to be paid only by practising members, covering the cost of the statutory functions. This would have the advantage that retired members and others who did not need to be licensed to practise could continue to play a full part in the work of the College without having to pay a statutory retention fee.

Question

(10) Should membership of the College be separated from the licence to practise, with separate membership and registration fees?

Regulation of veterinary nurses and other paraprofessionals

47. RCVS awards qualifications to veterinary nurses but has no power to regulate their conduct. This is seen as a deficiency within the Veterinary Nursing scheme and a voluntary scheme of self-regulation is in preparation. The new Veterinary Nurses Council will wish to consider whether veterinary nurses should ultimately be subject to full regulation by RCVS, or alternatively set up their own regulatory arrangements.
48. Other paraprofessional groups are much smaller than the veterinary nurses, but similar issues will arise in relation to them. The Royal Charter already gives RCVS power to award qualifications for veterinary paraprofessionals, but it would be helpful if there were also power to regulate the conduct of groups of paraprofessionals who preferred to come under the oversight of RCVS rather than making other arrangements. Council has already expressed the view that RCVS should provide this umbrella jurisdiction.
49. In 2000 RCVS adopted the aim of increasing the range of tasks which veterinary surgeons could safely delegate to appropriately trained and regulated paraprofessionals. Veterinary surgeons should be free to delegate to paraprofessionals holding qualifications recognised by RCVS from time to time, so that appropriate training and qualifications can be developed without the need for repeated changes in the law.

Questions

(11) Should the veterinary nursing scheme continue to be administered by RCVS?

(12) Should RCVS seek power to regulate the conduct of veterinary nurses and other paraprofessionals who may from time to time become recognised?

RCVS
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QUESTIONS

Views are invited on the issues raised in this paper, and in particular on the following questions:

- (1) What proportion of Council seats should be allocated to non-veterinarians? 25%, more than 25%, or less than 25%?
- (2) Should organisations representing animal owners, eg the National Farmers Union or the Kennel Club, have a right to nominate members to Council? If so, which organisations?
- (3) Should the six UK universities with veterinary schools nominate members to Council? If so, should the university representation be one from each university, or one to represent all?
- (4) Should regional elections for Council members be considered, eg with veterinary surgeons resident in the four countries of the UK and overseas voting separately?
- (5) Should the Preliminary Investigation Committee have powers:
 - a. for very serious allegations only, to suspend members during investigations and pending a disciplinary hearing;
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- (6) Should the Disciplinary Committee have the wider powers of disposal suggested?
- (7) Should a longer period than ten months elapse following the removal of a name from the Register before an application may be made for it to be restored?
- (8) Should the Act apply to all animals, including fish, that regularly enter the human food chain or are kept for commercial or sporting purposes or as companion animals?
- (9) Can the definition of "veterinary surgery" in the current Act be improved?
- (10) Should membership of the College be separated from the licence to practise, with separate membership and registration fees?
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