

Blue Cross Response to CMA Marketing Remedies May 2025



Who we are

Blue Cross is a charitable organisation seeing pets belonging to people on means-tested benefits. Within the population of those seeking our help, 70% are eligible for free-of-charge treatment including medication, investigation, and surgery following the payment of a £10 consultation fee. The remainder are eligible for the same service at a subsidised cost.

To extend our reach we have our Veterinary Care Fund which offers awards of up to £300 to support veterinary care of patients at private practices whose owners are unable to afford essential welfare or life-saving treatment.

Additionally Blue Cross rehomes dogs, cats, small pets and horses through its rehoming centres and advice units. We mostly use private veterinary services local to our centres for veterinary care of our rehoming population.

In our setting, cost is a significant consideration both in terms of the use of our own funds and the acknowledgement of the limited funds of those pet owners eligible for our subsidised service who contribute to the costs of their pet's care. Additionally, central to our decision-making is the welfare of the pet and their owner.

At Blue Cross we welcome the CMA's continued focus on the veterinary sector and share the goal of making care more affordable and accessible for pet owners. Every day we see the impact of rising costs, from pets being handed over to our rehoming services to growing numbers of referrals to our hospitals because owners simply can't afford treatment. Our Veterinary Care Fund has expanded from 23 to over 1,600 practices in just two years, which shows the scale of need.

We welcome the opportunity to respond to the Remedies Working Paper published by the CMA 1st May 2025 and have endeavoured to do so in detail where Blue Cross has specific knowledge and experience.

Summary of our response

Whilst supportive of the goals of the remedies, we are concerned that some proposed measures risk increasing pressure on an already overstretched veterinary workforce. The problems the CMA investigation has correctly highlighted are problems with the veterinary industry as a whole. However, the proposed remedies seem disproportionately focussed on the profession over the industry.

Vets face unique challenges—treating multiple diverse species across a wide range of disciplines, keeping pace with medical advances, meeting rising client expectations, and managing fear of complaints—all amid soaring demand. With suicide rates three to four times higher than the general population and high levels of anxiety and depression, further strain without improved support, risks more vets leaving the profession, worsening workforce shortages and compromising animal welfare.

We are concerned that many of the proposed remedies will involve increased amounts of time, both administrative and professional. The impact will be disproportionately greater for smaller independent practices and charities compared to the larger veterinary groups. Additionally, it is hard to see how the proposed measures will improve animal welfare.

Given the costs of implementing the remedies are likely to be borne by veterinary practices the added costs will ultimately be passed on to pet owners. Therefore, the most straightforward and least costly measures should be sought to achieve a more balanced and fairer marketplace.

Blue Cross Response to CMA Marketing Remedies May 2025



We support greater transparency across the board, particularly when it comes to pricing for commonly accessed services, medicines and cremation options. Owners deserve clear and honest information when making decisions, especially at emotionally difficult times. But we don't believe that price caps or rigid fee structures are the solution. Veterinary businesses need the freedom to operate sustainably.

Many of the suggested measures, such as price transparency and clear complaints processes, are already included in the RCVS Code of Professional Conduct. The investigation rightly highlights that these standards are not always consistently upheld, however existing regulation should form the basis of any remedies imposed. It is important that any measures introduced do not compromise vets professional sworn commitment to uphold animal welfare, which in some instances is at odds with consumer wishes and demands.

Since many practices are now owned by non-vets, we support exploring regulation at the business level. How this is implemented will need careful thought, but what matters is that reforms help ensure veterinary care remains accessible, affordable and of high quality.

One area of real potential is the role of registered veterinary nurses. They are highly skilled professionals who are often underutilised. Strengthening their legal recognition and expanding their clinical duties could improve access to treatment and make veterinary care more affordable for owners without compromising standards.

It is concerning that the CMA considers a location-based analysis of Large Veterinary Group (LVG)-owned practices sufficient to assess their impact on competition. The initial report highlighted the rapid expansion of these groups—now owning over 60% of practices, along with related services like pharmacies, labs, referral centres, and crematoria—as a key concern. This level of market concentration warrants further closer examination.

We believe that tailoring care to the specific context of the pet and owner—including financial considerations—is key to addressing the profession's challenges. Offering pragmatic care often demands greater skill and judgment than simply applying 'gold standard' treatments. However, recommending these options can carry a feeling of heightened risk of criticism or blame if outcomes are poor.

At Blue Cross, it's vital our clinicians can confidently provide consistent, pragmatic care to pets and their owners. To support this, we've developed a clearly defined scope of service and clinical guidelines that are evidence-based, welfare-focused, and cost-effective—built on thorough research and discussion. A similar, collaboratively developed resource endorsed by the RCVS could benefit the wider profession, offering vets and clients alike greater confidence in choosing a pragmatic, welfare-driven approach.

As an animal welfare charity, we believe the primary focus of any reform must be to protect and improve access to veterinary care for all pets. Any remedies must be introduced with care and with a deep understanding of how veterinary services operate in reality. If done well, they have the potential to support pet owners, relieve pressure on the profession and, most importantly, safeguard the health and welfare of the nation's pets.

In the following pages we have responded to the individual remedies. We have given overarching responses to each remedy rather than answering every question individually as there was a significant degree of overlap in our answers.

We feel the time period (less than four weeks) was a little short to fully respond to proposals of this breadth and depth.

Blue Cross Response to CMA Marketing Remedies May 2025



Helping pet owners choose FOPs, referral providers and treatments that are right for them and their pet

Remedy 1: Require FOPs and referral providers to publish information for pet owners

Questions 3-11

Standardised pricelists for practice websites

We support greater transparency of pricing which may include standardised pricelists.

However, inclusion of the right services on a standardised pricelist is not without challenge.

- Clients will generally find it easiest to compare prices for straightforward services such as consultations, vaccinations, or neutering.
- A potential risk of listing only basic services is that some practices may use these as "loss leaders"—offering them at low prices to attract clients, while charging significantly more for other services.
- Once services become more complex requiring clinical judgement and choices from both the vet and the owner, for example management of chronic diseases such as diabetes, it becomes much harder to provide clear, comparable pricing. It may only be possible to give guide prices and practices may be caught between appearing competitive and giving a realistic indication of cost.
- For more advanced procedures a pricelist should include some indication of the skills of the person performing the procedure to give more depth to the value of the service.
- It is important that price listings do not discourage clients from seeking help creating a situation where animal welfare is at risk.
- Displaying prices for specific treatments should not replace the value of an initial consultation, which provides an opportunity to discuss options tailored to the client's circumstances and financial situation (contextualised care).
- It is important to make provision for pet owners who will not be able to access standardised pricelists via the internet.
- It is important that all practices offer affordable euthanasia options.

Despite these challenges, price transparency for basic and essential services could be beneficial in both increasing competition and helping lower the cost of routine veterinary care, benefiting animal welfare.

Some of the services included on the standardised price list suggested by the CMA are vague eg 'Nasal Investigation', 'Heart Murmur', 'Epilepsy Investigation'. There are a wide variety of different ways a practice could approach providing a price for these services, making true comparison difficult for the pet owner.

We agree that it is important for a practice to publish information about practice ownership and the complaints handling process.

Measurements of quality are difficult to define and may have unintended consequences (see answer under Remedy 16). However additional measures which may be helpful for pet owners to decide whether a FOP meets their needs could include:

Blue Cross Response to CMA Marketing Remedies May 2025



- Numbers of vets and veterinary nurses
- Consultation length
- Availability of hospitalisation onsite
- Where out of hours care takes place
- Further qualifications held by members of staff
- PSS membership
- Membership of schemes such as Cat Friendly and Dog Friendly schemes
- Relationships with referral practices

There would need to be an understanding that many of these features will significantly affect the cost of the care delivered.

Since developing meaningful measures of quality is difficult, we would support the creation of a guide for pet owners (RCVS endorsed) on how to choose a veterinary practice (including what influences the cost of the service) and negotiate choice in the treatment of their pet.

It is essential that the enquiry develops a thorough understanding of how prices are calculated across different types of veterinary practices. Without this insight, there is a risk that some of the proposed remedies could have unintended consequences. For example, to keep a range of services affordable, practices often apply disproportionate mark-ups to some individual services. If restrictions are placed on how these services are priced or delivered, the associated costs may simply be shifted to other areas.

Remedy 2: Create a comparison website supporting pet owners to compare the offerings of different FOPs and referral providers

Questions 12-18

We are cautious about the idea of a national comparison website, which may oversimplify how pet owners choose their vet. These relationships are built on trust, not just price. Owners already use reviews, personal recommendations and their own experiences to guide their choices, and with better pricing transparency, those tools could be even more meaningful. There is a risk that owners may choose to have one condition managed at one practice and another at a different practice based on price comparisons. This could be detrimental to overall patient care and welfare.

Introducing a price comparison website for veterinary services would create a significant administrative burden for practices and could disadvantage smaller, independent clinics compared to larger, multi-site corporate groups.

Any costs incurred in the creation of the site are likely to ultimately increase the price of treatment for pet owners.

It is important to ensure that any comparison would include not only price, but the measures of level of service included in the previous answer.

As mentioned in the previous answer, it may be more helpful to create an RCVS endorsed guide for pet owners on how to choose a veterinary practice.

A way of accessing information would need to be considered for those pet owners with limited access or ability to use technology.

Blue Cross Response to CMA Marketing Remedies May 2025



Remedy 3: Require FOPs to publish information about pet care plans and minimise friction to cancel or switch

Questions 19-21

Pet care plans that include professional services can offer pet owners financial security and help them budget for treatment. We agree that clear information on what these plans cover is important.

However, we are concerned that requiring annual usage summaries and pay-as-you-go comparisons would create a significant administrative burden. With transparent pricing for both plans and individual services, owners should be able to evaluate the value of a plan themselves.

Remedy 4: Provide FOP vets with information relating to referral providers

Questions 22-26

Blue Cross is a first opinion charity provider. The pet owners we serve have limited resources to attend referral practice, however in some cases there is a need to discuss referral as an option and occasionally a referral will be made.

At Blue Cross, we maintain relationships with several nearby referral providers and usually offer referrals to these practices. We are also happy to refer clients to a practice of their own choosing.

Expecting FOP vets to stay up to date with the full range of referral services and providers—at a level deep enough to guide client decision-making—is unrealistic. This level of knowledge is difficult to maintain and may exceed what can reasonably be discussed within the time constraints of a standard consultation.

A more practical solution may be to publish a recognised guide—potentially endorsed by the RCVS—that helps pet owners understand how to choose a referral practice. Combined with the publication of key information on referral practices' websites, this could give owners the tools they need to make an informed choice at their own pace.

A system to enable a search for referral practices offering a particular service, as proposed in the remedy may be helpful. However, both the set-up costs and the administrative work in keeping it updated must be kept to a minimum to avoid increasing service costs for clients.

Remedy 5: Provision of clear and accurate information about different treatments, services and referral options in advance and in writing

Questions 27-35

Providing written information (to the level of detail suggested) on treatment options would be very time-consuming and would contain a significant degree of uncertainty in many cases. For example, the results of diagnostic tests and how a patient responds to a course of treatment cannot be determined in advance and yet will have a very significant impact on the outcome and overall cost.

While some content could be standardised, much of it would need to be tailored to the specific needs of each pet and their owner's individual circumstances.

Vets are already required to maintain accurate and timely records of all consultations, diagnostic work, procedures, and advice given. Even meeting these existing obligations can be challenging within the limited time available for each appointment.

Blue Cross Response to CMA Marketing Remedies May 2025



There is potential for technologies such as voice-activated notetaking and AI to assist in generating written guidance. However, not all professionals may be comfortable using these tools, and smaller practices may lack the resources to invest in such systems.

Any additional tasks that require a vet's professional time will inevitably increase costs for the pet owner.

It is also difficult to define a fixed number of treatment options that must be presented, as this will depend heavily on the nature of each case. In some situations, there may be only one or two viable options.

Allowing pet owners time to consider the treatment options proposed is important and within reason, most vets will do this. However, setting a definitive period of 'thinking time' which should always be allowed will not be achievable for all cases. Available time for decision-making is often dictated by the diagnosis, the condition of the animal, the treatment proposed, and the availability of the practice to proceed with the service.

Introducing a financial threshold—above which written information must be provided—could reduce the frequency of this requirement. However, such thresholds may not be meaningful to pet owners, as the perceived financial impact will vary greatly depending on individual circumstances.

Remedy 6: Prohibition of business practices which limit or constrain the choices offered to pet owners

Questions 36-39

Veterinary care should be led by what is in the best interests of the animal and tailored to the circumstances of the owner. While practices need to be financially sustainable, pressuring clinicians to meet revenue goals risks overtreatment, undermines trust and can lead to inefficiencies in care.

If some practices are limiting veterinary surgeons' clinical freedom in advising pet owners on the full range of treatment options, we agree that this would be non-compliant with the RCVS Code of Professional Conduct. This is an example of where regulation of veterinary businesses as well as individual vets is necessary.

Many practices—including organisations such as Blue Cross—develop clinical guidelines to support veterinary decision-making. These guidelines summarise treatment options and supporting evidence in an accessible format, offering a helpful resource for vets to make informed recommendations tailored to each situation.

Importantly, these are guidelines, not rigid protocols. They are intended to aid, not restrict, clinical judgment and should not prevent discussion of all reasonable options, including those not available at the practice.

Although the importance of the provision of independent and impartial advice is already addressed in the RCVS Code of Conduct, the RCVS may wish to highlight this principle more prominently and promote ongoing awareness among vets and practice owners.

To reinforce compliance, the following measures could be considered:

- Requiring vets to reaffirm their commitment to giving independent and impartial advice during annual registration.
- Requiring practices to commit to upholding this principle as part of their registration.
- Including the importance of clinical freedom as a discussion point during practice inspections, particularly with business owners and practice managers.

Blue Cross Response to CMA Marketing Remedies May 2025



Increasing price competition in the medicines market

Remedy 7: Changes to how consumers are informed about and offered prescriptions

Questions 40-43

Whilst we agree that it is important for clients to be made aware that they can have a prescription for medication as an alternative to purchasing at the practice, we have significant concerns around the proposal of mandatory prescriptions for the following reasons.

Reduction of in-practice pharmacy provision:

- Stock ordering and management, plus the training and staffing in-practice dispensaries is a significant cost for a practice.
- If mandatory prescriptions are introduced, in-practice provision may be reduced to what is essential for immediate care.
- As such mandatory prescriptions may reduce options for pet owners and create additional barriers for clients trying to obtain medications.

Impact on compliance and owner behaviour

- The vet has no visibility that the pet owner has sourced the medication.
- If the process of obtaining treatment becomes too time-consuming, expensive, or confusing, some pet owners may simply opt out— not pursuing the recommended treatment at all.
- This raises a significant compliance concern. Under the Animal Welfare Act, owners have a legal responsibility to ensure appropriate care for their animals. Veterinarians depend on owner compliance to uphold animal welfare standards, and any added hurdles risk undermining this.

Increase in time to obtain medications:

Timely access to medications is critical for animal welfare, particularly in conditions requiring:

- Pain relief
- Antibiotic treatments
- Management of chronic conditions, such as diabetes

Using internet pharmacies may delay treatment due to delivery times, which can extend to up to two weeks. This delay can negatively impact welfare by:

- Prolonging discomfort or illness
- Increasing the risk of complications
- Reducing the effectiveness of treatment

Cost Inequity: Smaller practices and charities are less likely to benefit from the bulk discounts available to online pharmacies and LVGs.

Lack of Wholesaler Competition: Vet practices face more limited options and often higher prices when purchasing medications through wholesalers, in comparison to online pharmacies.

Owner Burden: Expecting owners to research and source medications themselves adds a barrier to care. Many clients take time off work to visit the vet and a prescription may require additional time and be a disadvantage to receiving all necessary treatment in one visit.

Charitable settings such as Blue Cross provide medications at much reduced costs to animal owners, the mandatory provision of a prescription will be an unhelpful and time-consuming step resulting in increased costs to the pet owner.

Blue Cross Response to CMA Marketing Remedies May 2025



Fraud is of significant concern. A system that enables vets to send prescriptions directly to a chosen pharmacy/supplier would help prevent fraud. However, owners may not know their pharmacy of choice until after doing research, as the consultation document acknowledges, leading to a further delay in obtaining medication and starting treatment.

Digital Exclusion: Not all clients or clinics have reliable internet access.

Access for Vulnerable Populations: Individuals of no fixed address may face difficulties obtaining medications through online pharmacies.

With respect to a price cap on prescription fees:

Issuing a prescription involves legal certification by a veterinary surgeon, which is a core professional duty. This responsibility is significant, and errors can have serious consequences for a vet's professional standing and livelihood.

Therefore, if mandatory prescriptions are introduced, fees must reflect the legal and professional burden involved in certifying these documents.

With respect to speed and cost-efficiency:

This could be improved through intelligent IT systems. However, these must accommodate the diverse range of practice management software currently used, ensuring compatibility. The cost vs benefit of such systems should be explored.

With respect to transitional periods for introduction of measures:

- If the offer of a prescription became mandatory with a price cap on prescription fees was introduced; this could be implemented relatively quickly, as it aligns more closely with current practice.
- If the provision of prescriptions became mandatory in all but exceptional cases with a price cap on prescription fees (option of choice by the CMA) is introduced; this will require a longer period of implementation which may involve the following:
 - Adjusting pricing structures in vet practices to maintain sustainability in the face of reduced medication selling.
 - Reducing pharmacy capability in practices if unable to compete with online pharmacies.
 - Supporting owners in navigating the split between receiving veterinary advice and obtaining medication elsewhere.

Any transition must include ongoing monitoring for welfare impact, ensuring changes continue to support the best outcomes for animal patients.

Remedy 8: Transparency of medicine prices so pet owners can compare between FOPs and other suppliers

Questions 44-46

Regarding the question of what price information should be included on the prescription form: In our view, the prescription form should include only the information necessary to prescribe the medication. This is a professional communication between a veterinary surgeon and a suitably qualified person (e.g., a vet, pharmacist, or SQP – Suitably Qualified Person).

To support transparency separately providing a link to a trusted price comparison site (of VMD approved pharmacies) could be valuable for clients, helping them understand their options for

Blue Cross Response to CMA Marketing Remedies May 2025



obtaining the medication elsewhere. There remains the question of who would pay for, manage and keep such a site updated; medication prices and availability vary on a very regular basis.

Regarding the question of what information vets should give pet owners when giving them the prescription:

While it is acceptable to inform clients that there are various options for fulfilling the prescription (e.g., online or local pharmacies), it is not the vet's professional responsibility to guide them through the marketplace or provide price comparisons.

The discussion between vet and client should remain focussed on the welfare of the animal and the safe use of the prescribed medication. This includes:

- How to administer the medication
- How to handle or store it safely
- The expected duration of treatment
- How to assess whether the treatment is working

Additional Concerns About Prescription Process Changes

Technical and Digital Barriers

- Transitioning to IT-based prescription systems could deter some clients and vets, particularly those with limited digital access.
- Implementing features like QR codes for individual products will require significant development:
 - Practice management systems must support dynamic coding, accounting for frequent product changes in wholesaler inventories.
 - Relies on stable internet connections for both practices and clients.
 - Vulnerable groups, such as people with no fixed address, may be excluded from digital processes.

Welfare Implications

- While these changes may improve information transfer and price transparency, they do not directly improve animal welfare.
- For charity clients, additional steps, delays, or costs associated with digital prescriptions could actually reduce access to timely care.
- Requiring clients to search for online pharmacies or compare prices adds another layer of complexity to accessing treatment, especially for those already facing financial or digital barriers.

Remedy 9: Requirement for generic prescribing (with limited exceptions) to increase inter brand competition for medicine sales

Questions 47-54

We support the use of generic information on written prescriptions as an effective way to manage medication costs and stock supply issues, ultimately improving access to veterinary medicines.

However, the decision about whether to prescribe by generic ingredient or medication brand should remain the veterinary professional's decision as they bear the responsibility for prescribing.

Situations Requiring Branded Products

While generic prescribing could be the norm, there are cases where specifying a branded product is clinically necessary. For example:

Blue Cross Response to CMA Marketing Remedies May 2025



- When a follow-up medication must align with a previous injectable formulation, and the data sheet supports safety and efficacy only for a specific branded product
- When a different concentration or formulation of the same active ingredient might lead to variation in clinical outcomes
- Where a specific product must be used due to patient intolerance or adverse reactions to alternatives

Remedy 10: Prescription price controls

Questions 55-59

We can understand that prescription charges should not be used to discourage pet owners from acquiring their medicines from alternative providers, however we are cautious about the introduction of price capping of prescription charges. The following points should be taken into account in deciding whether this is an appropriate action:

Currently, the low volume of prescriptions relative to total caseload allows vets to manage the time and effort involved in issuing them. However, if prescriptions became mandatory and numbers increase significantly:

- More time will be needed for writing accurate prescriptions which may reduce time to spend with patients.
- For pets on multiple medications the time involved could be significant

Prescription fees need to reflect the true professional input and legal responsibility involved. Issuing a prescription is not a simple administrative task. It involves legal certification, which only veterinary surgeons are qualified to perform. Errors in this process carry serious consequences.

We would not support capping of prescription charges at existing levels as this would give considerable advantage to those practices currently charging the most.

Prohibition on charging for prescriptions, even temporarily will force practices to transfer those costs elsewhere, most likely onto the cost of a consultation.

Dispensing Costs vs. Prescription Costs

The cost of writing a prescription primarily reflects the vet's time and professional accountability. However, dispensing medication within a practice involves a wider range of responsibilities and costs, including:

- Ordering and receiving stock
- Adequate temperature-controlled storage of medications
- Purchase of suitable containers for dispensing
- Handling by trained personnel
- Counting and labelling of doses
- Providing advice to the owner on safe and effective use

When clients choose to fulfil prescriptions elsewhere, they lose access to this in-person support, potentially resulting in misunderstanding or misuse of the medication.

As stated earlier, where mandatory prescriptions result in a significant fall in demand for medicines dispensed from the practice (practices are rarely able to secure the same economies of scale as online pharmacies when purchasing medications), they may cease to offer them for all but the most immediate of needs. This would reduce options for those clients who would prefer the convenience of purchasing from the practice.

Blue Cross Response to CMA Marketing Remedies May 2025



Remedy 11: Interim medicines price controls

Questions 60-63

Introducing price controls of medication would be likely to significantly disadvantage smaller practices with lower buying power and may shift costs elsewhere. A closer look at the supply chain, how it affects the competitive position of veterinary practices and how the playing field could be levelled would be of more benefit.

Pricing of medications in veterinary practices

The pricing of medications in veterinary practices is largely determined by the practice's operating model and the price at which they are able to buy them from the wholesaler.

Larger buying groups, such as internet pharmacies, can undercut the wholesale costs of medications, making it harder for smaller veterinary practices to compete.

Limiting price control to the top 100 medications

Creating a list of the top 100 prescription medications presents several challenges:

- Selection criteria; should the list be based on volume or cost?
- Who will decide which medications to include?
- Who will maintain and update the list as new medications enter the market?

These questions need to be addressed for the system to be practical and effective.

Implementation of remedies 7 – 11

Questions 64-65

Cost Transparency and Online Pharmacies

We agree that medication costs should be transparent, and pet owners should have the option to obtain medications from internet pharmacies.

Making the offer of a prescription mandatory would help raise awareness amongst owners, but a full discussion of the different pricing options is difficult to achieve within an average 15-minute consultation, especially when the goal is to ensure animal welfare.

We have previously discussed the potential impact of capping prescription fees and driving more business to online pharmacies

Use of an e-prescription portal and price comparison tool

Whilst a price comparison tool could be beneficial for pet owners, certain groups of pet owners, such as those who cannot buy online or who have no fixed abode, may be disadvantaged by this system. Additionally, the constant changes in medication costs and supply issues affecting availability would result in significant resources to keep it up to date.

An e-prescription portal has the same challenges for those pet owners without internet access and could be challenging to set up such that it can manage fluctuations in medication prices and availability and integrate with multiple practice management systems. It's crucial that any new system be secure, simple, and accessible to all pet owners.

The CMA report suggests the Royal College of Veterinary Surgeons (RCVS) could manage an e-prescription portal and price comparison tool. However, RCVS is a regulatory body and it may be more appropriate for the VMD to manage a single, centralised website for cost-related information on medications. Managing this could require significant funding. Whatever the source of the funding, it is likely that ultimately it will result in higher medication prices or higher professional fees.

Increasing competition in outsourced OOH care and tackling high mark-ups in the price of cremations

Remedy 12: Restrictions on certain clauses in contracts with third-party out of hours care providers

Questions 66-67

Out of hours (OOH) care remains a significant concern. With fewer vets choosing to work unsociable shifts, many owners have limited options when their pet is in urgent need. These are moments of crisis when there is often no choice but to pay high costs. We support any efforts to improve access and affordability, but this challenge cannot be solved without addressing the broader staffing pressures in the profession.

Blue Cross is a charity providing its own OOH care. Whilst being able to acknowledge the significant challenges and costs associated with providing this service, we are not well placed to answer the questions in this section. It is important that any restrictions imposed do not deter new OOH providers entering the market and unintentionally reduce competition.

Remedy 13: Transparency on the differences between fees for communal and individual cremations

Question 68

We support increased transparency on fees for communal and individual cremations as in other areas of veterinary pricing.

Remedy 14: A price control on cremations

Questions 69-72

Suggesting that the RCVS undertakes a review and revision of prices in this area does not currently sit within their scope. The CMA has the opportunity to investigate the market for its breadth and competition of costs.

The ownership of pet cremation services is in many cases, part of corporate veterinary portfolios, which may limit competition within the sector. To ensure fair practices, it would be valuable to scrutinise the prices charged to veterinary practices.

This issue is closely linked to euthanasia costs, and has important welfare implications

The decision to euthanase a pet is a highly emotional one for owners. Most pet owners are typically unaware of the costs involved as they approach this difficult decision.

High euthanasia costs (especially where cremation costs are included) may act as a barrier for some owners, potentially leading to suffering for pets whose owners cannot afford the procedure. This issue underscores the importance of examining the financial accessibility of euthanasia services to prevent unnecessary animal suffering.

A regulatory framework which protects consumers and promotes competition

Remedy 15: Regulatory requirements on vet businesses

Question 73

We agree that veterinary businesses as entities should be monitored and regulated, ensuring they are accountable for decisions taken which impact customer services and animal welfare. Where businesses impose pressures on individual vets through targets, pricing guidelines, clinical protocols, and KPIs vets, especially those new to the profession or lacking confidence, may feel compelled to "sell" services or consistently recommend only the "gold standard" of care, regardless of the client's context or needs.

Whilst vets should always be responsible for the clinical decisions they take, operating in some environments has created a feeling of bearing all the responsibility with none of the control. This has contributed to stress within the profession, possibly leading some to leave the profession.

Remedy 16 - Developing new quality measures

Questions 74-77

We agree that developing means for pet owners to differentiate practices when looking for a FOP, however it may be more helpful to frame this as finding the most suitable practice rather than 'best quality'.

Any quality measures should be introduced carefully and with consideration of the following points

Challenges in measuring quality

- Quality is difficult to accurately measure and communicate to pet owners in a meaningful way, particularly certain key factors that directly affect clients such as accessibility and affordability of care. Elements like contextualised care are inherently nuanced and do not lend themselves well to standardised measurement or benchmarking.

Risks of a Public Quality Rating System

- If a quality award system is introduced and made public there is a risk that this could place undue pressure on veterinary practices and therefore professional staff to perform in a certain way. This may introduce conflict for vets whose primary responsibility is to the welfare of the animals under their care, affecting mental health and ultimately risking adversely affecting the quality of care delivered. It is worth reviewing the impact of the Ofsted system and school league tables on schools, where it has resulted in administrative burdens for teaching staff, mental health impacts and moved teaching to a model aimed at prioritising examination results.
- With the increasing level of specialisation and postgraduate qualification among general practice vets, there is a risk that the majority of practices may eventually qualify for a high-quality rating. This could dilute the meaning of such ratings, making the system ineffective or redundant over time. A further move towards additional qualifications and specialisation is unlikely to support the delivery of contextualised care across the profession.
- The Practice Standards Scheme (PSS) helps practices define the level of service they are able to offer, however this does not necessarily translate to quality. Meeting Core Standards is

Blue Cross Response to CMA Marketing Remedies May 2025



already a legal requirement for all UK practices. However, enhancing and adapting this scheme may be the most cost-effective solution.

Encouraging a Spectrum of Care

- Vets should be encouraged to offer a spectrum of care options to suit a wide range of client needs and financial situations. Quality frameworks should reflect and support this flexibility, rather than pushing practices toward a specific level of care.

Limitations of Traditional Comparison Metrics

- Comparing veterinary practices solely on facilities, equipment, vet qualifications, and the range of services offered may not lead to a truly meaningful or fair assessment of quality. A small practice that delivers contextualised care with a focus on welfare and what both pet and owner can manage, may be an excellent choice for many. However, defined quality measures may risk undervaluing such a service.

Need for Broader, More Inclusive Metrics

- A more balanced and comprehensive evaluation would include a wider set of parameters such as:
 - Client satisfaction levels
 - Accessibility, including opening hours, emergency care provision, and languages spoken by staff
 - Affordability and the spectrum of care options offered
 - In-house patient care standards, particularly out-of-hours (OOH) care
 - Staff turnover rates and satisfaction, which can reflect practice culture and sustainability
- Including these broader measures would offer a more holistic view of the service provided and would be a fairer reflection of quality. This could encourage practices to focus not only on clinical excellence but also on client experience, inclusivity, and workforce wellbeing.

Remedy 17: A consumer and competition duty

Questions 78-79

Veterinary surgeons are professionally obligated to prioritise the welfare of animals in their care above almost everything else. On occasion this conflicts with the wishes of the client. A duty to protect consumers and promote competition may at times be at odds with this professional obligation. As the regulator of veterinary professional standards, the RCVS would not seem best placed to oversee such duties.

Remedy 18: Effective and proportionate compliance monitoring

Questions 80-83

- Monitoring of compliance to the regulatory framework could offer benefits to both the profession and the public.
- Using self-audit and inspection would be a balanced solution. A hybrid model combining self-auditing and declarations of compliance, alongside external inspections, could be the most effective and proportionate approach. This allows practices to demonstrate accountability while ensuring independent oversight where needed.
- Introducing a system for recording and reporting complaints would significantly enhance transparency and help build public trust. It would also create opportunities for learning, continuous improvement, and the identification of systemic issues across the sector.

Blue Cross Response to CMA Marketing Remedies May 2025



- While monitoring systems may offer clear benefits, careful consideration must be given to the time and resources required to implement and maintain them. In a busy veterinary practice setting, the additional administrative burden could translate into higher operational costs, which may ultimately be passed on to the consumer.
- Similarly, establishing an organisation to oversee compliance and inspections would require significant investment. It must be clearly defined who will fund and be responsible for this, the government, an independent consumer body, or the veterinary profession itself. There is a risk that vets could face higher registration fees, which will again likely be passed on to the consumer, but also may impact sustainability.
- While a system for recording and reporting complaints can enhance transparency and public trust, it must be approached with care and sensitivity. Publishing raw complaint data without appropriate context could have unintended consequences, such as damaging morale and affecting the mental wellbeing and resilience of veterinary professionals. Any reporting system should ensure that data is anonymised, includes contextual information, and is used constructively, to support learning and improvement, rather than to assign blame or fuel reputational harm.
- As an alternative, a voluntary scheme could be developed, where practices choose to opt in and pay a membership or participation fee. In return, they would be assessed and, if compliant, awarded a recognised status or accreditation, similar to the existing “Dog-Friendly Clinic” designation. This status could be considered a mark of transparency and quality, encouraging consumer trust without mandating increased costs across the entire sector. It would also allow practices to adopt the scheme at a pace that suits their resources and priorities.

Remedy 19: Effective and proportionate enforcement

Question 84-85

Moving toward a model where businesses share responsibility with individual veterinarians, particularly in the context of complaints or litigation, could have a positive impact on the profession.

This approach would ensure that companies are held accountable for the guidelines, performance targets, and commercial pressures they impose on their staff. Shared responsibility would create a more balanced system where organisational policies are also scrutinised and regulated, not just the clinical decisions of individual vets.

Clear legal frameworks and professional guidance would be needed to define boundaries of responsibility, ensuring that vets are protected from disproportionate consequences, while still holding individuals and organisations appropriately accountable. This balance is essential to maintaining professional autonomy and encouraging open, non-punitive cultures within practices.

Giving the regulator additional powers would need to come with an appeals process which could be costly.

Remedy 20: Requirements on vet businesses for effective in-house complaints handling

Questions 86-87

Blue Cross Response to CMA Marketing Remedies May 2025



RCVS already imposes a duty to respond. This duty needs to be extended to businesses who employ vets as they have more control and visibility of complaints.

A clear, consistent process for handling consumer complaints—including guidance on how they should be managed at the local level and when escalation is appropriate—could be helpful. Such a framework would help build public trust and demonstrate the profession's commitment to transparency and accountability.

However, it's important that this process is proportionate and not overly burdensome in terms of time, administration, or cost. If too complex, it could negatively impact the value and affordability of services, especially for smaller independent practices that may lack the resources to manage additional administrative tasks. Any system introduced must be scalable, efficient, and fair to practices of all sizes.

Most complaints arise from a lack of or poor communication. So, in addition to finding a consistent reliable complaints process, improving communication training for undergraduate vets should be considered to try and reduce the volume.

Consultation questions: Remedy 21: Requirement for vet businesses to participate in the VCMS

Questions 88-90

VCMS have a lot of experience and high levels of success. In our view it would be reasonable to mandate vet businesses to participate in mediation. This process should however not be an alternative to an internal complaints process and should only be accessed when this has been exhausted.

A mandatory consistent and structured approach to complaint resolution, including referral to an Alternate Dispute Resolution (ADR) such as VCMS process, would help to increase consumer confidence in the veterinary profession. It would demonstrate a clear commitment to fairness and accountability and ensure that clients know what to expect when raising concerns.

Careful consideration must be given to the time and resources required to manage such a process—particularly for smaller, independent practices that may struggle to absorb the associated administrative burden

Claims of professional misconduct should be referred to the RCVS rather than handled by an ADR.

Remedy 22: Requirement for vet businesses to raise awareness of the VCMS

Question 91

The previously suggested requirements such as clearly signposting complaint procedures on the practice website, displayed in the waiting room and incorporating them into the practice's SOPs are reasonable and practical. These measures would help ensure clients are aware of how to raise concerns, while also embedding consistency and accountability into routine practice operations.

Remedy 23: Use of complaints insights and data to improve standards

Question 92

Blue Cross Response to CMA Marketing Remedies May 2025



The Code of Conduct and Practice Standards Scheme both have requirements for handling client complaints. Expanding these regulations to include internal audit and reflection on complaints could be the most efficient way of using complaints insights to improve standards.

The collection and analysis of complaint data by the RCVS could be valuable, both for monitoring trends and for encouraging self-reflection and continuous improvement across the profession. If used constructively, this data could help identify systemic issues, promote best practice, and support evidence-based policy decisions. There would need to be consideration of how this could be done without increasing the administrative burden on practices.

We would be concerned about using this data to benchmark practices due to the diversity of practice types. For example, complaints arising from the death of a patient are inevitably going to be higher in a dedicated OOH facility, and higher in a practice that provides its own OOH cover than one that refers all emergency and OOH work elsewhere.

Remedy 24: Supplementing mediation with a form of binding adjudication

Questions 93-95

Introducing a formal adjudication process for complaints could provide benefits in offering clarity to both clients and veterinary teams about how concerns will be handled.

The implementation of such a scheme could incur substantial costs, potentially affecting consumers. It would be essential to determine how the system integrates with the current legal framework. An appeals mechanism would also be necessary. Additionally, the adjudication process might need to operate independently from the mediation process and should involve both experienced vets and lay people.

If implemented on a voluntary basis, there could be low take up. However, participation could serve as a positive marketing tool, reinforcing trust and quality assurance in the eyes of the public, much like other voluntary accreditation schemes.

A binding process would need to be trusted by both the profession and the public to avoid negative impacts on the delivery of veterinary care such as the practice of defensive medicine.

Remedy 25: Establishment of a veterinary ombudsman

Question 96-98

We are unclear how the establishment of a Veterinary Ombudsman would provide any benefit over a binding adjudication process.

With either of these options, it is important that significant veterinary expertise is included (alongside lay representation) in the judgements made. There would need to be clarity on the type of complaints a veterinary ombudsman or binding adjudication process could deal with. For example it may handle service complaints, complaints of veterinary negligence may still need to follow the exiting legal process and complaints of veterinary misconduct being managed by the RCVS as the regulator of the profession.

It is important the process is trusted by both pet owners and vet practices. If decisions are not trusted by the practices and vets, it may lead to an increase in 'paying off' clients to avoid escalation, encouraging a claims culture amongst clients and ultimately lowering confidence in the profession.

It would need to be established how a veterinary ombudsman would be funded.

Effective use of veterinary nurses

Remedy 26: Protection of the vet nurses title

Question 99-101

We fully support the recognition of the title veterinary nurse. Registered Veterinary Nurses (RVNs) are highly trained individuals who are currently unable to contribute fully to the profession, reducing the benefits listed below.

Providing further guidance and clarity around what constitutes Schedule 3 procedures is important in increasing confidence in RVNs, but also among vets and practices regarding the appropriate delegation of tasks, ensuring they are working to their full potential while remaining within the bounds of the law.

One practical step would be to expand the existing case studies on the RCVS website to include a wider range of examples, clarifying both what veterinary nurses are and are not permitted to do.

Enhancing the use of Registered Veterinary Nurses (RVNs) under Schedule 3 and expansion of the role could bring significant benefits across multiple areas of the profession:

- For Nurses:
 - Improved morale and job satisfaction
 - Greater professional fulfilment through meaningful clinical involvement
 - Increased likelihood of longer career retention within the profession
- For Vets:
 - Greater confidence to delegate appropriately
 - More efficient use of time, allowing vets to focus on complex cases or other tasks only vets themselves can do
- For the Public:
 - Increased trust in the veterinary team as a whole
 - Better understanding of the high standard of care RVNs are trained to deliver
 - Potential for reduced costs through better use of resources
- For Animal Welfare:
 - No compromise to standards; RVNs are well-trained and fully capable of carrying out Schedule 3 procedures
 - More efficient care delivery, supporting increased accessibility

With proper support and guidance, fully utilising the skills of RVNs could strengthen the profession, support sustainability, and enhance the overall client and patient experience.

Proportionality

Questions 102-105

A significant concern surrounding reformed regulation, is the potential cost burden on individual vets and businesses, which could ultimately be passed on to clients. While larger practices may be better

Blue Cross Response to CMA Marketing Remedies May 2025



positioned to absorb the increased administrative time and costs, smaller practices may struggle, potentially leading to increased operational expenses.

Given the existing regulatory framework including complaints handling (RCVS Code of Conduct, PSS, VCMS) has elements of many of the proposed remedies already in place, a logical and economical approach would be to strengthen, enforce and monitor these before introducing additional costly systems.

Any changes should be evaluated for their likely impact on animal welfare and wellbeing of the profession as well as consumer satisfaction.

In our view, increased guidance and confidence in the delivery of contextualised care (by both the profession and pet owners) would be one of the most effective ways of addressing many of the problems the profession is currently facing as well as increasing accessibility to care and improving the animal welfare.