



Assistance Dogs UK

A voluntary coalition of assistance dog organisations

ADUK responses – CMA remedies paper

● **Question 1: We welcome comments regarding our current thinking on the routes to implementing the potential remedies set out in this working paper.**

ADUK supports the CMA's approach to trial information remedies before full implementation, recognising pilot programs can help identify potential challenges and ensure that the remedies effectively address the needs of all assistance dogs' handlers and assistance dog organisations. It is vital, however, that the trial stage is accessible and inclusive of disabled people who rely on highly trained assistance dogs, to ensure the system works for all.

● **Question 2: We invite comments on whether these (or others) are appropriate information remedies whose implementation should be the subject of trials. We also invite comments on the criteria we might employ to assess the effects of trialled measures. Please explain your views.**

We believe that the proposed information remedies are appropriate and should be trialled. However, also feel it is important to emphasise that while displaying prices will generate a level of competition, it is not a direct measure to control prices and prevent inflation of costs – unlike a cap on profit margins, which would address this issue head on. Assessment criteria should include accessibility. Information should be available in formats accessible to all people, and disabled people should be involved in any trial stages to ensure remedies are accessible to all. A wide range of disabled people who rely on highly trained assistance dogs should be included. The trial should not be considered a success if disabled people are a) not able to access the trial, b) are disadvantaged by the trial.

● **Question 3: Does the standardised price list cover the main services that a pet owner is likely to need? Are there other routine or referral services or treatments which should be covered on the list? Please explain your views.**

The standardised price list does cover many of the main services that a pet owner is likely to need, but there are some key areas missing that should be included for clarity and transparency. These include:

- *2. Prescription, dispensing and administration: Repeat prescription fees, which are a common cost for pets with long-term conditions and can add up over time.*

Where possible, assistance dog partnerships should be exempt from any prescription costs.

- *3. Medications and chronic conditions: Chronic medication management, particularly for conditions like Cushing's and epilepsy or seizures, which require ongoing treatment and monitoring.*
- *4. Surgeries and treatments: Procedures such as laparoscopic spays and chemical castration should be given options, which are increasingly common choices for pet owners due to the less invasive nature.*
- *Diagnostics, including full blood panels and pre-anaesthetic blood tests, which are often recommended but not always clearly priced upfront.*
- *Specialist referrals or investigations, especially in cases like extended epilepsy diagnostics, where owners may face complex treatment journeys.*

Including these services would help owners make better-informed decisions and reduce the risk of unexpected costs.

● Question 4: Do you think that the 'information to be provided' for each service set out in Appendix A: Proposal for information to be provided in standardised price list is feasible to provide? Are there other types of information that would be helpful to include? Please explain your views.

ADUK cannot comment on the feasibility, however, if such a price list is published, we feel it would be helpful to include an indication of any potential unexpected or additional costs, particularly following surgeries. For example, while a standard surgery fee might be quoted, owners should be clearly informed about possible extras such as pain relief, post-operative complications, or further consultations. Ideally, the standard price should cover post-operative check-ups as part of the package, or this should be made explicit if not included. This would help manage expectations and improve trust between clients and practices.

● Question 5: Do you agree with the factors by which we propose FOPs and referral providers should be required to publish separate prices for? Which categories of animal characteristics would be most appropriate to aid comparability and reflect variation in costs? Please explain your views.

ADUK supports the most feasible method that brings transparency to assistance dog handlers/organisations. All proposed factors are suitable and reasonable in our view. ADUK would welcome a category of discounted or waived costs for assistance dogs.

● Question 6: How should price ranges or 'starting from' prices be calculated to balance covering the full range of prices that could be charged with what many or most pet owners might reasonably pay? Please explain your views.

ADUK will not respond to this question.

● Question 7: Do you think that the standardised price list described in Appendix A: Proposal for information to be provided in standardised price list would be valuable to pet owners? Please explain your views.

Yes, this would be valuable to assistance dog handlers and organisations, however, should not be restrictive on assistance dog care. It's essential that handlers/organisations are offered alternative treatment options - not just the most expensive option, or an option because it is included in the price list.

No care should be focused solely on a pricing perspective - it must be a welfare-based discussion between vet and handler/organisation. Giving them written price info about options is not adequate.

● Question 8: Do you think that it is proportionate for FOPs and referral providers to provide prices for each service in the standardised price list? Please explain your views.

ADUK believes this would be beneficial but cannot comment on the feasibility. However, it seems reasonable that a matrix could be devised to manage this process.

● Question 9: Could the standardised price list have any detrimental consequences for pet owners and if so, what are they? Please explain your views.

If an assistance dog needs a treatment beyond the list, it should not be restricted to those shared, and prices should be made available as soon as possible.

● Question 10: Could the standardised price list have any detrimental consequences for FOPs and referral providers? Are you aware of many practices which do not have a website? Would any impacts vary across different types or sizes of FOP or referral provider? Please explain your views.

ADUK will not respond to this question.

● Question 11: What quality measures could be published in order to support pet owners to make choices? Please explain your views.

ADUK will not respond to this question.

● Question 12: What information should be displayed on a price comparison site and how? We are particularly interested in views in relation to composite price measures and medicine prices.

ADUK supports the proposed changes as they lead to greater transparency to the assistance dog handler/organisation. Reviews help to inform consumer choice and hold providers to account. However, it is worth noting the cost is the concern so reviews should be focused on the experience of consumers costs, how accurate quoted prices are etc, and less on individual veterinary staff.

Composite price measures are welcome and will provide much greater transparency, but this should be very clear that other costs may be incurred with complications or specific unexpected conditions. We welcome the idea of a more complex break down, as this would provide the most transparency to assistance dog handlers/organisations when comparing care prices for their assistance dog. Where a practice offers reductions or waivers for assistance dogs, this should be included on the composite price measures.

A comparison of online pharmacy prices is a further welcome suggestion – increasing the awareness of the costings will give assistance dog handlers/organisations transparency when selecting the medicines and will encourage veterinary practices to be more competitive. Veterinary practices should not be able to force consumers to one brand of prescription and should focus on the active ingredient to allow this flexibility.

● Question 13: How could a price comparison website be designed and publicised to maximise use and usefulness to pet owners? Please explain your views.

ADUK has no preference on the route chosen for the design of the website, provided it is fully accessible, and people with a range of disabilities, impairments or health conditions advise and trial the development of the consumer interface. It must also be monitored, and compliance with the CMAs conclusions be enforced.

Charitable organisations such as ADUK can also share this within our networks to our members and their clients, as well as linking to it on our website and social media outlets to share with our members and their clients.

● Question 14: What do you think would be more effective in addressing our concerns - (a) a single price comparison website operated by the RCVS or a commissioned third party or (b) an open data solution whereby third parties could access the information and offer alternative tools and websites? Why?

ADUK has no preference, provided the website is accessible, transparent and monitored.

● Question 15: What are the main administrative and technical challenges on FOPs and referral providers in these remedy options? How could they be resolved or reduced?

ADUK will not respond to this question.

● Question 16: Please comment on the feasibility of FOPs and referral centres providing price info for different animal characteristics (such as type, age, and weight). Please explain any specific challenges you consider may arise.

ADUK will not respond to this question.

● Question 17: Where it is appropriate for prices to vary (eg due to bundling or complexity), how should the price information be presented? Please explain your views.

Information should be presented as clearly as possible with most common package breakdown and clearly marked as to what the most common extras may be and why they may occur. It should be presented in an accessible format, so the reach is inclusive.

● Question 18: What do you consider to be the best means of funding the design, creation and ongoing maintenance of a comparison website? Please explain your views.

ADUK will not respond to this question.

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

● Question 19: What would be the impact on vet business of this remedy option? Would the impact change across different types or sizes of business? Please explain your views.

ADUK will not respond to this question.

● Question 20: How could this remedy affect the coverage of a typical pet plan? Please explain your views.

ADUK will not respond to this question.

● Question 21: What are the main administrative and technical challenges on FOPs and referral providers with these remedy options? How could they be resolved or reduced?

ADUK will not respond to this question.

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

● Question 22: What is the feasibility and value of remedies that would support FOP vets to give pet owners a meaningful choice of referral provider? Please explain your views.

ADUK cannot comment on the feasibility, however the increase transparency of remedies that would support FOP vets to give assistance dog handlers/organisations a meaningful choice is significant. The option of the drop-down system seems suitable for allowing time and space to select the best option. Assistance dog handlers/organisations should always be made aware if their choice is time sensitive due to the welfare of the dog.

● Question 23: Are there any consequences which may be detrimental and if so, what are they?

ADUK will not respond to this question.

● Question 24: What do you consider are likely to be the main administrative, technical and administrative challenges on referral providers in this remedy? Would it apply equally to different practices? How could these challenges be reduced?

ADUK will not respond to this question.

● Question 25: If you are replying as a FOP owner or referral provider, it would be helpful to have responses specific to your business as well as any general replies you would like to make.

ADUK will not respond to this question.

● Question 26: What information on referral providers that is directly provided to pet owners would effectively support their choice of referral options? Please explain your views.

Alongside the same compulsory information as provided by FOP vets, referrals should provide information about their pricing structure including areas such as prescription charges or ongoing prescription following the referral. There should also be information provided on the options of alternative referral providers to increase competition. Waiting times and availability, as well as visiting times should also be clear. Furthermore, it would be reasonable to add the location on the referrals to enable assistance dog handlers/organisations to consider the distance they'd have to travel which would impact their costs. This is particularly important for disabled people who rely on highly trained assistance dogs, as the referral centre must be suitable for them to access, e.g. via public transport, and be accessible on arrival. It should also be made clear whether direct claims for insurance are accessible through the referral provider.

● Question 27: If a mandatory requirement is introduced on vet businesses to ensure that pet owners are given a greater degree of information in some circumstances, should there be a minimum threshold for it to apply (for example, where any of the treatments exceed: £250, £500, or £1,000)? Please explain your views.

No, there should be no minimum cost. Assistance dog handlers/organisations should be able to access information at all levels and the matter should be treated with equal regard no matter the reason for the vet's intervention.

● Question 28: If a requirement is introduced on vet businesses to ensure that pet owners are offered a period of 'thinking time' before deciding on the purchase of certain treatments or services, how long should it be, should it vary depending on certain factors (and if so, what are those factors), and should pet owners be able to waive it? Please explain your views.

It is important that time is provided to think, particularly in the case of assistance dogs, as handlers may need to contact and speak with the organisation who supplied their assistance dog, which may retain ownership. It should be made clear what the expiry for the quote will be before a handler/organisation leaves the consultation, to enable them time to process without risking price changes.

● Question 29: Should this remedy not apply in some circumstances, such as where immediate treatment is necessary to protect the health of the pet and the time taken to provide written information would adversely affect this? Please explain your views.

The animal's welfare should always be a priority, so there should be provisions to ensure the animal is not in distress during any agreed waiting period. ADUK largely agrees with the exceptions, however, does emphasise that all options should be presented to the handler/organisation before an emergency decision is made. This should not be at the expense of the pet's welfare, so every effort should be made to ensure the dog is comfortable before such a thinking time is given.

● Question 30: What is the scale of the potential burden on vets of having to keep a record of treatment options offered to each pet owner? How could any burden be minimised?

ADUK will not respond to this question.

● Question 31: What are the advantages and disadvantages of using treatment consent forms to obtain the pet owner's acknowledgement that they have been provided with a range of suitable treatment options or an explanation why only one option is feasible or appropriate? Could there be any unintended consequences?

ADUK will not respond to this question.

● Question 32: What would be the impact on vet businesses of this remedy option? Would any impacts vary across different types or sizes of business? What are the options for mitigating against negative impacts to deliver an effective but proportionate remedy?

ADUK will not respond to this question.

● Question 33: Are there any barriers to, or challenges around, the provision of written information including prices in advance which have not been outlined above? Please explain your views.

All information should be provided in an accessible format, or available to request in an accessible format.

● Question 34: How would training on any specific topics help to address our concerns? If so, what topics should be covered and in what form to be as impactful as possible?

ADUK will not respond to this question.

● Question 35: What criteria should be used to determine the number of different treatment, service or referral options which should be given to pet owners in advance and in writing? Please explain your views.

Assistance dog handlers/organisations should be presented with the most likely pathways for the assistance dog.

Assuming the website above goes ahead, this would be an important tool that should be shared with the pet owners. Where someone is unable to access the internet, there should be the option for the vets to provide them printed information of their request.

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

● Question 36: Are there any specific business activities which should be prohibited which would not be covered by a prohibition of business practices which limit or constrain choice? If so, should a body, such as the RCVS, be given a greater role in identifying business practices which are prohibited and updating them over time? Please explain your views.

There should be a maximum profit margin to ensure mark-ups by veterinary practices are not excessive and exploitative. Veterinary Practices should be required to prescribe active ingredients rather than branded medicines, where suitable. Veterinary practices should be able to advise handlers/organisations of all options, for OOH, Crematoriums and should be able to provide these and not be retrained to one chain. This would

provide the opportunity for vets to exercise their clinical freedom whilst not feeling they are restricting handlers/organisations.

● Question 37: How should compliance with this potential remedy be monitored and enforced? In particular, would it be sufficient for FOPs to carry out internal audits of their business practices and self-certify their compliance? Should the audits be carried out by an independent firm? Should a body, such as the RCVS, be given responsibility for monitoring compliance? Please explain your views.

ADUK cannot respond to this question, however, is clear it is vital this is monitored independently (not just by self-declaration) and managed to ensure compliance. It may be suitable for a reporting or whistleblowing system to be put in place to support compliance.

● Question 38: Should there be greater monitoring of LVGs' compliance with this potential remedy due to the likelihood of their business practices which are rolled-out across their sites having an impact on the choices offered to a greater number of pet owners compared with other FOPs' business practices? Please explain your views.

There should be an independent watchdog to monitor practice across all providers.

● Question 39: Should business practices be defined broadly to include any internal guidance which may have an influence on the choices offered to pet owners, even if it is not established in a business system or process? Please explain your views.

Yes, assistance dog handlers/organisations should be given the upmost transparency and therefore it is important all information is accessible regardless of whether it is currently a system.

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

● Question 40: We would welcome views as to whether medicines administered by the vet should be excluded from mandatory prescriptions and, if so, how this should be framed.

Where a medicine must be administered by a vet, it is reasonable that this should be purchased by the practice. However, the practice should be able to purchase the cheapest example of the drug, based on active ingredient, not drug name. No inflated cost should be accepted and passed along to the assistance dog handler/organisation.

● Question 41: Do these written prescription remedies present challenges that we have not considered? If so, how might they be best addressed?

ADUK will not respond to this question.

Prescriptions

● Question 42: How might the written prescription process be best improved so that it is secure, low cost, and fast? Please explain your views.

ADUK feels option C is the most reasonable proposal but believes this should go further extending free prescription charges for Assistance dogs.

● Question 43: What transitional period is needed to deliver the written prescription remedies we have outlined? Please explain your views.

ADUK will not respond to this question.

● Question 44: What price information should be communicated on a prescription form? Please explain your views.

Option B or Option C as set out in point 4.50. It must be noted that if option B is selected it is important to ensure the comparable price is not selected to be higher where lower prices are available. The inclusion of a QR code would be important as access to the information in an easy way is essential. It may be worth considering a hybrid of B & C where assistance dog handlers can ask for more information at the practice for accessibility reasons.

● Question 45: What should be included in what the vet tells the customer when giving them a prescription form? Please explain your views.

Customers should be made aware that they have the option to buy the prescription from them and can be made aware of the cost of that. They should also be made aware this is something that can be purchased elsewhere with directory on how to do so.

● Question 46: Do you have views on the feasibility and implementation cost of each of the three options? Please explain your views.

ADUK cannot comment on the feasibility but believes implementation should be monitored to ensure that prices are not handed down to customers by a sudden hike in appointment fees.

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

● Question 47: How could generic prescribing be delivered and what information would be needed on a prescription? Please explain your views.

As referenced in point 4.48, ADUK supports the identification of the active ingredient, and could reference examples. ADUK supports the view that practitioners should not prescribe by a single brand unless there is clinical reason.

● Question 48: Can the remedies proposed be achieved under the VMD prescription options currently available to vets or would changes to prescribing rules be required? Please explain your views.

ADUK will not respond to this question.

● Question 49: Are there any potential unintended consequences which we should consider? Please explain your views.

ADUK will not respond to this question.

● Question 50: Are there specific veterinary medicine types or categories which could particularly benefit from generic prescribing (for example, where there is a high degree of clinical equivalence between existing medicines)? Please explain your views.

ADUK will not respond to this question.

● Question 51: Would any exemptions be needed to mandatory generic prescribing? Please explain your views.

ADUK will not respond to this question.

● Question 52: Would any changes to medicine certification/the approval processes be required? Please explain your views.

ADUK will not respond to this question.

● Question 53: How should medicine manufacturers be required to make information available to easily identify functionally equivalent substitutes? If so, how could such a requirement be implemented?

Option B in paragraph 4.86 seems to be a reasonable offer, requiring transparency is essential for assistance dog handlers/organisations to make informed decisions.

● Question 54: How could any e-prescription solution best facilitate either (i) generic prescribing or (ii) the referencing of multiple branded/named medicines. Please explain your views.

ADUK will not respond to this question.

Remedy 10: Prescription price controls

● Question 55: Do you agree that a prescription price control would be required to help ensure that customers are not discouraged from acquiring their medicines from alternative providers? Please explain why you do or do not agree.

ADUK supports this action, and feels that prescription fees for assistance dogs should be removed. Therefore supporting point C in paragraph 4.96.

● Question 56: Are there any unintended consequences which we should take into consideration? Please explain your views.

ADUK will not respond to this question.

● Question 57: What approach to setting a prescription fee price cap would be least burdensome while being effective in achieving its aim of facilitating competition in the provision of medicines? If we were to decide to impose a cost based price control for prescriptions, we need to fully understand the costs involved with prescribing and dispensing activities. We are seeking to understand:

ADUK supports point C, although recognises that this could be specific to assistance dogs only whilst a different remedy may be used for pet dogs.

● Question 58: What are the costs of writing a prescription, once the vet has decided on the appropriate medicine?

ADUK will not respond to this question.

● Question 59: What are the costs of dispensing a medicine in FOP, once the medicine has been selected by the vet (i.e. in effect after they have made their prescribing decision)?

ADUK will not respond to this question.

158 Remedy 11: Interim medicines price controls

● Question 60: What is the most appropriate price control option for limiting further price increases and how long should any restrictions apply for? Please explain your views.

ADUK would need more detail to select one of these methods but would support a cap on profit margins around the price a medicine was purchased by, by the practice, and the resale price to the assistance dog handler/organisation.

● Question 61: If we aim to use a price control to reduce overall medicine prices, what would be an appropriate percentage price reduction? Please explain your views.

ADUK will not respond to this question.

● Question 62: What should be the scope of any price control? Is it appropriate to limit the price control to the top 100 prescription medicines? Please explain your views.

Price controls should be universal so no matter the rarity of a case, the assistance handler/organisation is able to benefit from the controls.

● Question 63: How should any price control be monitored and enforced in an effective and proportionate manner? Please explain your views.

ADUK will not respond to this question.

Implementation of remedies 7 – 11

● Question 64: We welcome any views on our preferred system design, or details of an alternative that might effectively meet our objectives. Please explain your views.

The system proposal for a single e-prescription portal seems sensible, and an important step in transparency and ensuring assistance dog handlers/organisation have options to chose how to fulfil their prescription.

● Question 65: What do you consider to be the best means of funding the design, creation and ongoing maintenance of an e-prescription portal and price comparison tool? Please explain your views.

ADUK will not respond to this question.

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

● Question 66: What would be an appropriate restriction on notice periods for the termination of an out of hours contract by a FOP to help address barriers to FOPs switching out of hours providers? Please explain your views.

ADUK will not respond to this question.

● Question 67: What would be an appropriate limit on any early termination fee (including basis of calculation) in circumstances where a FOP seeks to terminate a contract with an out of hours provider? Please explain your views.

ADUK will not respond to this question.

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

● Question 68: Do you agree that the additional transparency on the difference in fees between fees for communal and individual cremations could helpfully be supplemented with revisions to the RCVS Code and its associated guidance? Please explain your views.

Yes, it is important that there is compassionate transparency. Where there is organisational support for the end of an assistance dog's life, more support would be given to help handlers make the best choice for them.

Remedy 14: A price control on cremations

● Question 69: If a price control on cremations is required, should this apply to all FOPs or only a subset? What factors should inform which FOPs any such price control should apply to?

A price control should be in place where providers are limiting the availability of cremation services to assistance dog owners/handlers. Where they can, FOPs should provide a variety of cremation providers and options.

● Question 70: What is the optimal form, level and scope of any price control to address the concerns we have identified? Please explain your views.

ADUK will not respond to this question.

● Question 71: For how long should a price control on cremations be in place? Please explain your views.

A price control should remain in place in the longer term to limit profit margins to prevent extortionate mark ups whilst assistance dog handlers/organisations and managing the loss of their dog.

● Question 72: If a longer-term price control is deemed necessary, which regulatory body would be best placed to review and revise such a longer term price control? Please explain your views. Remedy 15: Regulatory requirements on vet businesses

ADUK will not respond to this question.

A regulatory framework which protects consumers and promotes competition

● Question 73: Would regulating vet businesses as we have described, and for the reasons we have outlined, be an effective and proportionate way to address our emerging concerns? Please explain your views.

ADUK believes this is proportionate in relation to the reasons outlined. The breakdown in the sector has come from the changing nature of veterinary services, with increasing 'private' investment and interventions.

Remedy 16: Developing new quality measures

● Question 74: Are there any opportunities or challenges relating to defining and measuring quality which we have not identified but should take account of? Please explain your views.

ADUK will not respond to this question.

● Question 75: Would an enhanced PSS or similar scheme of the kind we have described support consumers' decision-making and drive competition between vet businesses on the basis of quality? Please explain your views.

ADUK believes that this would be a solid basis to increase competition, as veterinary businesses will have the opportunity to prove their value to their clients.

● Question 76: How could any enhancements be designed so that the scheme reflects the quality of services offered by different types of vet businesses and does not unduly discriminate between them? Please explain your views.

ADUK will not respond to this question.

● Question 77: Are there any other options which we should consider?

ADUK will not respond to this question.

Remedy 17: A consumer and competition duty

● Question 78: Should any recommendations we make to government include that a reformed statutory regulatory framework include a consumer and competition duty on the regulator? Please explain your views.

It would be reasonable to include a consumer and competition duty, to ensure any framework stays relevant and flexible enough to maintain transparency across the sector offering both veterinary practices and assistance dog handlers/owners the best service.

● Question 79: If so, how should that duty be framed? Please explain your views.

ADUK will not respond to this question.

160 Remedy 18: Effective and proportionate compliance monitoring

● Question 80: Would the monitoring mechanisms we have described be effective in helping to protect consumers and promote competition? Please explain your views.

ADUK believes these mechanisms would go a significant way to help protect consumers and promote competition. It would ensure more compliance and tackle operators who are not functioning in reasonable and fair ways for welfare and consumer interests.

● Question 81: How should the monitoring mechanisms be designed in order to be proportionate? Please explain your views.

ADUK will not respond to this question.

● Question 82: What are the likely benefits, costs and burdens of these monitoring mechanisms? Please explain your views.

The benefits would be an increase in consumer confidence, as assistance dog handlers/organisations would be able to trust that the systems they are accessing are monitored and therefore always acting within the best interests of the animals, not prioritising profits at the risk of welfare/ exploiting vulnerable consumers. However, ADUK does recognise this will come at an expense.

● Question 83: How could any costs and burdens you identify in your response be mitigated and who should bear them? Please explain your views.

ADUK will not respond to this question.

Remedy 19: Effective and proportionate enforcement

● Question 84: Should the regulator have powers to issue warning and improvement notices to individuals and firms, and to impose fines on them, and to impose conditions on, or suspend or remove, firms' rights to operate (as well as individuals' rights to practise)? Please explain your views.

ADUK believes this would be reasonable. A monitoring and compliance system is not effective without consequences.

● Question 85: Are there any benefits or challenges, or unintended consequences, that we have not identified if the regulator was given these powers? Please explain your views.

Effective and proportionate enforcement is essential in the veterinary sector to ensure compliance with welfare standards and professional responsibilities. Monitoring should be consistent, transparent, and adequately resourced, with clear accountability across all areas of practice.

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

● Question 86: Should we impose a mandatory process for in-house complaints handling? Please explain your views.

It seems reasonable to impose a mandatory process for in-house complaints handling, to increase transparency and services to assistance dog handlers/organisations it is right that system for dealing with complaints are rigorous and useable.

● Question 87: If so, what form should it take? Please explain your views.

ADUK will not respond to this question.

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

● Question 88: Would it be appropriate to mandate vet businesses to participate in mediation (which could be the VCMS)? Please explain your views.

ADUK feels this would be appropriate, as it provides more security for assistance dog handlers/organisations should an issue arise. With this enforceability, it provides further motivation for practices to ensure things do not go wrong in the first instance.

● Question 89: How might mandatory participation in the VCMS operate in practice and are there any adverse or undesirable consequences to which such a requirement could lead?

ADUK will not respond to this question.

● Question 90: How might any adverse or undesirable consequences be mitigated?

ADUK will not respond to this question.

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

● Question 91: What form should any requirements to publicise and promote the VCMS (or a scheme of mediation) take?

If VCMS becomes mandatory, it seems reasonable to input the requirements in paragraph 6.97, to communicate clearly with clients and that this should be baked into any complaints policy of the practice and shared within their complaints forum.

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

● Question 92: How should the regulatory framework be reformed so that appropriate use is made of complaints data to improve the quality of services provided?

ADUK agrees that data from complaints should be used to improve the quality of service provided, and supports a recommendation that data should be used in this way.

Remedy 24: Supplementing mediation with a form of binding adjudication

● Question 93: What are the potential benefits and challenges of introducing a form of adjudication into the sector?

Adjudication could support consumer rights, meaning that where a grievance is raised by an assistance dog handler/organisation, there is a duty for this to be addressed by the practice.

● Question 94: How could such a scheme be designed? How might it build upon the existing VCMS?

ADUK will not respond to this question.

● Question 95: Could it work on a voluntary basis or would it need to be statutory? Please explain your views.

As discussed within the previous section, this would likely need to be statutory to compel engagement from the veterinary practice.

Remedy 25: The establishment of a veterinary ombudsman

- Question 96: What are the potential benefits and challenges of establishing a veterinary ombudsman?

An ombudsman would streamline the practice of raising complaint or grievance, giving the consumer an independent third party they can engage with directly, which could also monitor trends and concerns across the sector.

- Question 97: How could a veterinary ombudsman scheme be designed?

ADUK will not respond to this question.

- Question 98: Could such a scheme work on a voluntary basis or would it need to be statutory? Please explain your views.

As with previous suggestions for monitoring and compliance, this would need to be statutory to ensure engagement.

Remedies 26 – 28: Effective use of veterinary nurses

- Question 99: What could be done now, under existing legislation, by the RCVS or others, to clarify the scope of Schedule 3 to the VSA?

ADUK will not respond to this question.

- Question 100: What benefits could arise from more effective utilisation of vet nurses under Schedule 3 to the VSA, in particular for the veterinary profession, vet businesses, pet owners, and animal welfare? Might this result in any unintended consequences?

ADUK will not respond to this question.

- Question 101: What benefits could arise from expansion of the vet nurse's role under reformed legislation, in particular for the veterinary profession, vet businesses, pet owners, and animal welfare? Might this result in any unintended consequences?

ADUK will not respond to this question.

- Question 102: Do you agree with our outline assessment of the costs and benefits of a reformed system of regulation? Please explain your views.

ADUK agrees with the outline assessment of this. It is reasonable to assume that costs would be incurred and there would be a need to spread this. ADUK also agrees that once systems are in place, this would be able to balance and not cause a disproportionate hike.

- Question 103: How should we develop or amend that assessment?

ADUK will not respond to this question.

● Question 104: How could we assess the costs and benefits of alternative reforms to the regulatory framework?

ADUK will not respond to this question.

● Question 105: How should any reformed system of regulation be funded (and should there be separate forms of funding for, for example, different matters such as general regulatory functions, the PSS (or an enhanced scheme) and complaints-handling)?

ADUK will not respond to this question.