

# Competition Market Authority Investigation into the Supply of Veterinary Services for Household Pets

## 1. About Dogs Trust

Dogs Trust is the UK's largest dog welfare charity and normally cares for around 14,000 dogs across its network of 21 rehoming centres in the UK and one in Dublin. Since Dogs Trust was founded in 1891 (formerly National Canine Defence League), we have always campaigned on dog welfare issues.

## 2. Executive

## Summary

- Dogs Trust primarily provides veterinary services to the dogs within our care but, under certain circumstances, our rehoming centre veterinary facilities will be used for owned dogs. Our veterinary facilities are not accessible to the general public however we do fall within the CMA's definition of a veterinary business and would need to comply with recommendations 2a, 2b, 2c and 3, which we explore in more detail below.
- We also have concerns that encouraging owners to compare prices could lead to a lack of continuity of care for their pets, particularly in managing long-term conditions and could have significant welfare implications.
- While we welcome the aim to improve transparency for pet owners, we would urge that any communications highlight the importance of the relationship between owner and veterinary professional when managing their pet's ongoing medical condition/s.
- Dogs Trust often cannot match the prices listed by commercial pharmacies, despite being a large organisation. Under the suggested requirements to advise owners that they could source their medication elsewhere, Dogs Trust could now be in a position where adopters on our supported schemes do so, and Dogs Trust covers this cost. This would not only reduce our purchase volumes and therefore reduce our discounts, it would increase the administration burden for our teams in processing invoices to reimburse individual owners.
- Dogs Trust would need to consult the trustees and executive board to consider whether it is an appropriate use of charitable donations on resolving pet owners' complaints via mediation, in view of our current thorough complaints process.
- Dogs Trust welcomes the suggestion to review the outdated legislation governing veterinary professions and to expand this to include regulation of veterinary businesses. We do, however, have some concern regarding the costs associated with regulatory reform, which we explore below.

## 3. Supply of Veterinary Services for Household Pets

As a dog welfare charity, caring for around 14,000 dogs per year, Dogs Trust works closely with the veterinary services market to help manage the welfare of dogs in our care, as well as owned dogs who we support through our outreach schemes, post-adoption support funds and emergency fund.

While we rely heavily on local first opinion practices to provide an experienced Veterinary Surgeon and use of their clinic facilities, Dogs Trust also employs Registered Veterinary Nurses at each of our 21 UK rehoming centres. There is also a central support team consisting of 12 Veterinary Surgeons and 8 Registered Veterinary Nurses.

Dogs Trust has actively participated throughout the CMA's review to consider any recommendations that might place additional pressure on veterinary and animal welfare charities in the UK. As a sector that is already under increased pressure from rising costs alongside increased demand for our services, we hope our feedback helps to identify any unintended consequences for ourselves and other organisations and for the welfare of the animals and their owners who rely on us.

### **3.1. Veterinary Business definition**

Considering the CMA's definition of a veterinary business:

*"A person (any entity whether they are a legal person like a company, in a joint venture or partnership, or an individual) carrying on a business that comprises the retail provision of one or more Veterinary Services to pet owners for their household pets."*

Each of our 21 rehoming centres has a registered veterinary surgery accredited by the RCVS Practice Standards Scheme on site. Dogs Trust primarily provides veterinary services to the dogs within our care but, under certain circumstances, our rehoming centre veterinary facilities will be used for owned dogs. These might be adopted dogs returning for treatment or surgery such as vaccination or neutering where the service is provided free of charge, or dogs belonging to staff members who can access the facilities at a reduced cost. Our veterinary facilities are not accessible to the general public however we do fall within the CMA's definition of a veterinary business and will therefore be required to comply with the following recommendations:

*2a - Requirement to publish basic service information including out-of-hours (OOH) provision, staff qualifications and accreditations on websites and in premises*

*2b. Requirement to publish a list of prices for standard services on websites and in premises*

*2c. Requirement to publish prices for parasiticide (ie flea, tick and worming) medicine products on websites and in premises, along with a link to a list of approved online pharmacies*

*3. Requirement to provide the information set out in remedies 2a-d above plus ownership and basic practice information directly to the RCVS; an undertaking from the RCVS to collect the information set out above, make it publicly available on its Find a Vet platform, enhance the platform's functionality and share data with approved third parties*

Dogs Trust relies on our local associated veterinary practices to provide out of hours cover for our dogs – this could be within their own practice or they may outsource to a dedicated provider. In addition, the majority of our rehoming centres do not have an employed Veterinary Surgeon. It would be misleading for us to publish the qualifications of our central veterinary team who provide remote support, or those of the members of the associated veterinary practice who are not employed by Dogs Trust, we would therefore be restricted to listing Registered Veterinary Nurse/s as the sole employees.

As mentioned, specific services are provided to adopters of Dogs Trust dogs free of charge but are included within the adoption fee they pay. We commit to all dogs being fully vaccinated and neutered while in our care but, where this is not possible, they can return for treatment. Considering the defined services list, Dogs Trust undertakes many of these within our

veterinary clinics. Producing and displaying a price list and particularly making this publicly available via the RCVS Find a Vet platform, even if indicative costs are included, could lead any member of the general public to wrongly believe they could bring their dog to our veterinary clinics for treatment.

We would ask for consideration of this point to ensure Dogs Trust is not misleading members of the public by displaying the services we provide.

We have also previously expressed concern that, encouraging owners to compare prices could lead to a lack of continuity of care for their pets which is crucial, particularly in managing long-term conditions and could have significant welfare implications. The emphasis would be on the pet owner to understand that they should disclose to their new practice if their pet is already under the treatment of another clinician to prevent any potential duplication or detrimental treatment interactions. While we welcome the aim to improve transparency for pet owners, we would urge that any communications highlight the importance of the relationship between owner and veterinary professional when managing their pet's ongoing medical condition/s.

### **3.2. Prescriptions and online pharmacies**

*7. Requirement to make pet owners aware they can get a prescription and buy medicines online more cheaply through standardised notices in waiting rooms and by including standardised messages in a range of communications. Vets would need to tell pet owners about written prescriptions in consultations. Undertaking from the RCVS to produce and distribute standardised notices and information about the written prescription process and for it to host a copy of literature on its website.*

Dogs Trust established an in-house pharmacy in 2019 to supply medication, at a reduced cost to the charity, to adopters whose dogs had medical issues at the point of rehoming and were eligible for support with the associated costs. While we are a large organisation, with the medication volumes we purchase giving us strength in our buying power which affords us significant reductions, we often cannot match the prices listed by commercial online pharmacies. Under the suggested requirements to advise owners that they could source their medication elsewhere, Dogs Trust could now be in a position where adopters on our supported schemes do so, and Dogs Trust covers this cost. This would not only reduce our purchase volumes and therefore reduce our discounts, it would increase the administration burden for our teams in processing invoices to reimburse individual owners.

### **3.3. Complaints procedure**

*15. Requirement to engage in mediation in good faith where the pet owner's complaint is not resolved in-house and the pet owner wishes to take the complaint to mediation*

Dogs Trust has a robust and publicly available complaints process for resolving any concerns across the organization, including our veterinary services. While complaints regarding our veterinary provision are low, for reasons stated above these are not publicly available in most cases, should any reach the proposed mediation service Dogs Trust would likely be charged a fee for this. In commercial businesses, if someone takes a case to the Financial Ombudsman

there is a charge regardless of the outcome. Dogs Trust would need to consult the trustees and executive board to consider whether this is an appropriate use of charitable donations, particularly in view of our current thorough complaints process.

#### **3.4. Regulation and costs**

*17. A recommendation to government to establish a replacement statutory regime for the regulation of veterinary services for household pets, including: regulating veterinary businesses and the practices they own; regulating the professional conduct of vets and vet nurses; robust and effective monitoring and enforcement; an effective complaints and redress system; statutory duties to promote competition and further the interests of pet-owners; and an independent and effective veterinary regulator.*

Dogs Trust welcomes the suggestion to review the outdated legislation governing the veterinary professions and to expand this to include regulation of veterinary businesses. We do however have some concern regarding the costs associated with regulatory reform. Dogs Trust veterinary practices adhere to the voluntary RCVS Practice Standards Scheme and your estimate of £330 per practice per year, in addition to this would be a significant increased cost for our organisation and other animal welfare charities. In addition, the cost to support a mediation service and an increase to professional fees for veterinary surgeons and registered veterinary nurses appears to be likely, placing further financial strain on veterinary and animal welfare charities.