



Our vision for a thriving veterinary sector

July 2026

CP 1615

E03636453
978-1-5286-6306-9



Government of the United Kingdom

Our vision for a thriving veterinary sector

Presented to Parliament by the Secretary of State for Environment, Food & Rural Affairs by Command of His Majesty

July 2026

Including the government response to the recent consultation on reform of the Veterinary Surgeons Act, and to the Competition and Markets Authority market investigation into veterinary services for household pets

CP 1615

We are responsible for improving and protecting the environment. We aim to grow a green economy and sustain thriving rural communities. We also support our world-leading food, farming and fishing industries.

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ISBN 978-1-5286-6306-9

E03636453 07/26

Printed on paper containing 40% recycled fibre content minimum

Printed in the UK by HH Associates Ltd. on behalf of the Controller of His Majesty's Stationery Office

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Ministerial foreword



**Baroness Hayman of
Ullock,
Minister for Animal
Welfare and Biosecurity**

I am deeply committed to ensuring that we have a thriving veterinary sector. One that properly supports the professionals who dedicate their lives to caring for animals and upholds the highest standards of animal welfare. It should also protect consumers, and fully support a strong and growing economy. I have seen first-hand the professionalism, skill, and commitment of those working across the veterinary field. I believe they deserve a framework that recognises their contribution and helps them to flourish.

Veterinary professionals play an indispensable role in our society. They care for beloved pets, protect livestock and food security, safeguard public health and biosecurity and enable international trade. Their work touches all of our lives. To continue delivering this vital contribution, they need a modern, fair, and effective regulatory system that reflects the realities of today's veterinary practice and supports a sustainable workforce. This is not achievable under the current Veterinary Surgeons Act 1966 (VSA). After carefully considering all 6,219 responses to the consultation on reform of the VSA it is clear that many of you share this view.

A strong and proportionate regulatory framework is also central to maintaining public trust. It helps ensure that animal welfare is always prioritised and that consumers can have confidence in the veterinary services they rely on. At the same time, regulation must allow businesses to innovate, compete fairly, and grow. It must support a sector that is resilient, forward-looking, and responsive to change.

Getting this right matters.

We want to enable a veterinary sector that is well-regulated, sustainable, and trusted. We can then support the professionals at its heart, continue to deliver strong outcomes for animals and their owners, and unlock wider economic benefits. It is not just about reforming legislation. It is about backing a sector that makes a real difference to people's lives and to the whole country.

I would like to thank everyone who took the time to engage with the consultation. Your contributions have been invaluable in shaping our understanding and informing the next stage of policy development.

I would also like to extend my thanks to the Competition and Markets Authority (CMA) for its market investigation into veterinary services for household pets. Its findings and recommendations reinforce the case for reform and complement the work set out here.

I also welcome the Environment, Food and Rural Affairs Committee's report, [A sustainable veterinary workforce](#), published on 3 June 2026. The Government will respond to this in due course.

This White Paper outlines the government's next steps to support a thriving, modern veterinary sector through reform of the VSA. These reforms will contribute to this government's mission to rebuild Britain. A new Act, brought forward as Parliamentary time allows, will ensure that all veterinary professionals and businesses providing veterinary and animal healthcare services operate within a robust, proportionate regulatory framework. This will strengthen animal welfare and increase public trust in veterinary services. By addressing competition concerns identified by the CMA, it will also help support innovation, choice, and economic growth.

A handwritten signature in black ink, appearing to read 'Suella Brabman', written in a cursive style.

Baroness Hayman of Ullock, Minister for Animal Welfare and Biosecurity

Chief Veterinary Officers (CVOs) foreword

As Chief Veterinary Officers of the UK, Northern Ireland, Scotland, and Wales, and leaders of Government Veterinary Services (GVS), we are proud members of the veterinary profession. We recognise how vital it is that the veterinary sector, and professionals within it, are supported to thrive.

Our sector has evolved significantly over the course of our careers and will continue to do so. Advancements in scientific understanding and technology enable veterinary professionals to provide comprehensive and integrated care. This will continue to evolve with new developments in the future.

We have also seen a move away from the traditional veterinary surgeon-owned and run veterinary practices. Large corporates now own and manage more practices. Against this backdrop, it is essential that legislation evolves too. We can then deliver the best of veterinary care while also protecting and supporting consumers.

The introduction of new legislation will represent a substantial change for many veterinary professionals. It fundamentally changes how we as individuals, and those we work with and work for, are regulated and held to account. Change can be daunting, but we believe change can improve transparency and accountability. We also believe change will improve support for:

- the veterinary professionals
- veterinary and animal healthcare businesses
- the public
- the animals we care for

Welcoming more veterinary professions into the veterinary regulatory framework aims to enhance animal welfare and strengthen public confidence. We anticipate that extending regulation will make it clearer what each profession is allowed to do.

For this legislation to succeed, government will need to strike the right balance between regulatory clarity and flexibility. The legal framework must be robust and adaptable enough to meet the evolving needs of the veterinary sector, both now and in the future. A significant part of this comes down to increasing the flexibility awarded to the regulator. This will ensure they can make appropriate decisions, within the right governance framework, without requiring continual legislative change. The government will achieve this through greater Parliamentary and independent oversight of the regulator and its activities. Other governance changes will improve clarity for veterinary professionals, regarding the role and responsibilities of the regulator. This will help build and maintain a strong level of trust between them.

The veterinary profession has had an unsettled time in recent years, but we are excited for the future. A future where modern, fit for purpose legislation will support the entire veterinary team, the animals we care for and the myriad of roles we do.

Professor Christine Middlemiss CB (UK Chief Veterinary Officer)

Brian Dooher (Chief Veterinary Officer for Northern Ireland)

Sheila Voas (Chief Veterinary Officer for Scotland)

Richard Irvine (Chief Veterinary Officer for Wales)

Executive summary

The government's vision is that the health and welfare of animals and public health are central to everything the veterinary sector does. We also want to ensure consumers are empowered with the information they need to make informed choices. The paper sets out proposals to change the regulatory system to deliver this vision.

We have created the proposals following the recent consultation on reform of the Veterinary Surgeons Act 1966 (VSA) and from the recommendations of the Competition and Markets Authority's (CMA's) market investigation into veterinary services for household pets.

We received 6,219 responses to the consultation, which was open between 28 January and 25 March 2026. The majority of responses were submitted online (6,034), with a smaller number received via email (184) and post (1). Alongside the consultation, we also conducted three workshops (attended by 45 participants), four focus groups (26 participants) and 20 in-depth interviews. These activities included a range of stakeholders from across the veterinary sector, such as regulatory bodies, veterinary professionals, allied professionals, animal welfare organisations and business owners, as well as members of the public including animal owners (covering household pets, equine owners and farmers).

The CMA's market investigation lasted nearly 2 years, with its initial consultation receiving 56,000 responses. This investigation has demonstrated the huge amount of interest and strength of feeling about the veterinary market for household pets from both professionals and consumers.

Individual veterinary professionals demonstrate incredible professionalism and compassion. The current legislative structure lacks flexibility with regards to what activities different professionals can complete. This hampers the sector reaching its full potential. We can only achieve our vision for the veterinary sector by delivering new primary legislation. This proposed legislation will provide the foundation to ensure the veterinary sector functions in a way that benefits animals, professionals, the public, and the wider economy.

Our reforms cover 4 broad areas:

- regulation of all veterinary professionals
- regulation of all veterinary and animal healthcare businesses
- support for consumers
- structures and governance of the regulator

These measures will uphold our high standards of animal welfare, support consumers, and ensure that veterinary professionals remain a trusted part of this vital sector. Greater oversight will increase public confidence in those who care for their animals.

The veterinary workforce has been struggling with recruitment and retention for the past few years, increasing pressure on those who remain. These veterinary professionals have a significant role to play in keeping the UK public safe, through the food supply chain and disease outbreak mitigations and actions. Enabling other licensed professionals to complete activities that are currently reserved only for veterinary surgeons will have a positive impact on animal health and welfare, public health, food security, and biosecurity. For example, veterinary work supports public health in line with a One Health approach - veterinary professionals implement biosecurity measures and vaccination programmes to help prevent disease outbreaks, which can also reduce the need for antibiotics and other interventions that can harm the environment.

The regulator will determine which activities each profession can complete and will regularly review them to ensure they remain up to date. This will replace the current system, which is not fit for purpose and is failing to serve the veterinary professions and animals.

Statutory regulation of veterinary professionals should include, and protect titles for, all professionals within the sector. All professionals in this space will have to apply for a licence to practise to carry out specific veterinary and animal healthcare activities.

Regulation of professionals under a reformed Act will also include an updated fitness to practise scheme, based on “current impairment” rather than past misconduct. Under the new process, the regulator will consider whether a licensed professional currently poses a risk to animal welfare and public health, rather than just reviewing past actions. The introduction of different types of licences will remove barriers that currently prevent people with disabilities from entering the veterinary professions as well as continuing to facilitate emergency workforce needs.

The introduction of regulation of veterinary and animal healthcare businesses will ensure that providers of veterinary services meet standards across the sector. These standards will relate to clinical expectations, staffing requirements, and transparency. The regulator will have powers to support the monitoring and enforcement of these standards. These powers include gathering information, gaining entry for inspections, and issuing sanctions where businesses are not compliant. Government and the regulator will regularly review business requirements to ensure they remain fit for purpose.

The regulation of businesses will also enable the introduction of consumer duties, helping to tackle the “consumer detriment” identified by the CMA. This will increase transparency and ensure that consumers have the relevant information available to them to make informed decisions about the care of their animals. Additionally, it will introduce standards around handling complaints, as well as a means of binding redress for consumers.

As the regulation of veterinary professionals and businesses change, it is vital that the governance structure and processes of the regulator adapt to meet the new requirements. The Royal College of Veterinary Surgeons (RCVS) is unique in that it currently carries out both regulatory and professional leadership activities. They do this under both the VSA

and their own Royal Charter. This has led to confusion for both the public and the profession about the RCVS' role and purpose. By streamlining the regulatory landscape and increasing the transparency of the activities the RCVS undertakes, we will increase clarity around and trust in the regulator. In line with reviews of the regulation of professionals and businesses, the regulator's model will be regularly reviewed by government to ensure it remains appropriate.

To further align the regulator with current norms and best practice, a new Act will increase Parliamentary and independent scrutiny of the regulator's activities. This will ensure that it continues to protect the public, maintain animal welfare, and uphold trust in the veterinary professions.

This government is committed to ensuring regulation is conducted at the right level and is not overly burdensome on businesses and other organisations. We have balanced this with areas where there is a clear need for regulation. This policy has been developed alongside the Regulation Directorate and conforms to the government's [Regulatory Action Plan](#).

Reforming the VSA, as Parliamentary time allows, is fundamental to ensuring a thriving veterinary sector. A thriving sector that enhances animal welfare, supports professionals, builds trust for consumers, and grows the UK economy.

The need for legislative reform

Background

The UK veterinary profession is one of the oldest in the world. The first English-speaking veterinary school, the Royal Veterinary College, London, opened in 1791 to treat ill working horses. In 1844, the Royal College of Veterinary Surgeons (RCVS) was created, becoming the statutory regulator under the first Veterinary Surgeons Act in 1881. This has since been replaced a few times, with the latest iteration, the Veterinary Surgeons Act 1966 (VSA), still being the main legislation governing the sector today.

Secondary legislation has updated and supplemented the VSA on a number of occasions over the intervening years. However, there is a practical limit to what the VSA can achieve through this approach due to the limitations of the Act itself. There have been calls for reforms of the VSA for decades due to:

- changes in best practice for regulating professionals
- introduction of new members of the veterinary team
- changes in practice ownership
- concerns from the public about transparency
- lack of flexibility of the current legislation

The longer the VSA has remained unchanged, the more urgent those reforms have become. We are now at a stage where failure to reform could have real implications for animal welfare, as well as veterinary professionals and consumers. The government is immensely proud of the work of veterinary professionals within the UK. We recognise how vital it is to ensure that the legislation supports these professionals, especially given the pressures many of them face.

In addition, the public and government are concerned about the cost of living, particularly in the last few years. This is largely due to the impacts of the Covid-19 pandemic, and the conflicts in Ukraine and the Middle East. It is more imperative than ever that government is doing everything it can to support the public with their finances. The CMA's investigation highlighted the difficult truths about above inflation fee raises for veterinary services for household pets; again, highlighting the need for change now.

In 2025, a report from the Committee of Public Accounts noted concerns about the UK's resilience to threats from animal disease. This report particularly noted the difficulties with recruiting and retaining veterinary professionals to undertake surveillance and biosecurity work. There are currently many activities that only veterinary surgeons can do, which increases the pressure on them. Reforming the VSA will enable other licensed professionals from within the veterinary team to undertake additional work. This will help ensure that veterinary surgeons are available to complete the work that only they should carry out.

A recent consultation and separate CMA investigation has also shaped our approach to legislative reform in depth.

Consultation

During 2025, Defra ran a co-design process with our main veterinary stakeholders. This included Government Veterinary Services (GVS), the RCVS, the British Veterinary Association (BVA), the British Veterinary Nursing Association (BVNA), and the Veterinary Schools Council. The discussions informed a public consultation on potential reforms to the VSA.. The consultation was launched by Defra with the support and consent of the Devolved Governments in Scotland, Wales, and Northern Ireland. It ran from 28 January 2026 until 25 March 2026 and received a total of 6,219 responses. The majority of responses were submitted online (6,034), with a smaller number received via email (184) and post (1). Alongside the consultation, there were three workshops (attended by 45 participants), four focus groups (26 participants) and 20 in-depth interviews. These activities included a range of stakeholders from across the veterinary sector, such as regulatory bodies, veterinary professionals, allied professionals, animal welfare organisations and business owners, as well as members of the public including animal owners (covering household pets, equine owners and farmers). This qualitative data was reviewed and analysed to aid further development of the policy.

Data from the consultation responses can be seen on our consultation site [here](#).

CMA

Following concerns raised by the public and an initial review, the CMA launched a market investigation into veterinary services for household pets on 23 May 2024. This investigation highlighted the limitations of the current VSA and the impact this is having on competition within the sector, and therefore on consumers. The CMA published the final report from this investigation on 24 March 2026 and clearly recommends that government reforms the VSA.

Full details of the recommendations and government's response to them can be found in Annex I.

Vision for the veterinary sector

Our vision for the veterinary sector is that the health and welfare of animals and public health are placed at the heart of everything the veterinary sector does. At the same time, we want to ensure consumers are empowered with the information they need to make informed choices.

The veterinary professions have consistently demonstrated that they are caring, highly skilled, and deeply committed. They care for millions of pets and companion animals every day. They have been central to the national response in times of crisis, including the Foot and Mouth Disease outbreak in 2001 and more recent outbreaks of Highly Pathogenic Avian Influenza. Veterinary professionals have also played a vital role in supporting the UK's food system and international trade. For example, through their work on Sanitary and Phytosanitary (SPS) checks following EU Exit and as part of our work to reset our relationship with the EU. Their work directly contributes to the UK being seen as a safe and reliable trading partner to the rest of the world, underpinning our £25 billion annual food and drink export trade. Every day, they protect the health and welfare of millions of animals across the UK, including those which over 17 million households class as part of their family.

Veterinary professionals, and the individual professions to which they belong, are best able to thrive when there is clear regulation and guidance setting out who can undertake which activities. This is alongside confidence that professional titles are protected and only used by those who are appropriately qualified and licensed. This clarity will help the public better understand who is qualified to provide veterinary services and the scope of those services, strengthening trust in the professions. Increased public trust should, in turn, encourage increased engagement with veterinary professionals, improving outcomes for animal welfare. Licensing the wider veterinary team will also enable important work, such as biosecurity, to be undertaken by trusted and qualified professionals.

This government made a clear commitment in its 2024 Election Manifesto to maintain and improve animal welfare. Delivering on that commitment depends on a strong and sustainable veterinary sector.

The government has also committed to tackling the cost of living. Achieving this requires markets that function effectively, with sufficient competition and access to clear information so consumers can make informed decisions. A thriving veterinary sector can increase choice for consumers, drive healthy competition, and contribute to wider economic growth.

Veterinary services will remain a privately run industry, with businesses free to determine the services they offer and the prices they charge. Improving transparency, particularly around pricing and ownership, will help consumers to compare services and exercise choice. This will help promote competition within the market and support affordability for the UK's 17.2 million pet-owning households.

These benefits should be available to all within the UK. We will continue to work with colleagues from Wales, Scotland, and Northern Ireland to ensure we can maintain a cross-UK approach to veterinary legislation.

To deliver a thriving veterinary sector, we need legislation that is modern and fit for purpose. In a rapidly changing and sometimes uncertain world, it is impossible to predict all the challenges the next few decades will bring. This is especially due to new and emerging diseases, technological advances, and a changing climate. New legislation must be sufficiently flexible to allow government, the regulator, and the profession to respond effectively to future developments.

Clear and transparent governance arrangements must underpin all of this. The regulator must have appropriate powers to fulfil its statutory duties and objectives. There must also be robust checks and review mechanisms to ensure it continues to operate effectively, proportionately, and in the public interest.

Regulation of veterinary professionals

Veterinary professionals play a vital role in:

- safeguarding our high animal health and welfare standards
- delivering animal disease control
- supporting food security and public health
- upholding international trade

For the professions to thrive and continue delivering these outcomes, it is important the system for regulating individual professionals is rigorous and robust.

Veterinary professionals, like many other regulated professionals, are trusted to use professional judgement and act within their own areas of competence. Failure to adequately regulate veterinary professionals could result in persons who lack suitable qualifications practising on animals. This could have dangerous implications for animals, the public, biosecurity, trade, and the economy. Trust in veterinary professionals is the cornerstone of a trusted and resilient veterinary sector.

The need for legislative reform

The current regulatory framework no longer reflects how veterinary care is delivered today. The VSA fully regulates and protects only the title of veterinary surgeon across the UK, meanwhile, the Farriers (Registration) Act 1975 (FRA) regulates and protects the title of farriers within England, Scotland, and Wales.

Registered veterinary nurses and allied veterinary professionals (AVPs) are subject to only limited statutory regulation. The regulation limits the work these professionals can complete, as they are reliant either on activities listed in [Schedule 3 of the VSA](#) or on an exemption order. This creates barriers to the effective use of the wider veterinary team, places unnecessary pressure on veterinary surgeons, and limits workforce flexibility. It also creates confusion for the public and professionals about who is qualified, authorised, and accountable for different aspects of animal healthcare.

The lack of comprehensive regulation for all veterinary professionals presents risks to animal welfare and public confidence. Individuals may use professional titles without holding appropriate qualifications or skills. This increases the potential for poor standards of care and makes it difficult for animal owners to make informed decisions. Further confusion is caused by the different registers currently held by the regulator, including 'overseas practising', and 'non-practising' registers. This fragmentation makes it harder for consumers and the public to navigate the system and verify whether a professional is authorised to practise, weakening transparency and trust.

The absence of comprehensive regulation also creates risks for animal welfare and public understanding. Individuals may use the titles of veterinary nurses or AVPs without holding

the appropriate qualifications or skills. This increases the risk of substandard care and confusing animal owners and consumers. The lack of clarity undermines confidence and makes it harder for the public to understand who is appropriately trained and authorised to treat their animals.

There are also concerns about the UK's biosecurity and how the country would respond to disease threats. Veterinary professionals are a vital part of the UK's biosecurity system contributing across prevention, detection and response. Through routine clinical work, they are often the first to identify unusual disease patterns and report notifiable conditions. This supports early detection and national surveillance. On farms and in companion animal practice, they help prevent disease spread through vaccination programmes, biosecurity advice and responsible use of medicines, including antimicrobial stewardship.

During outbreaks, veterinary professionals implement control measures on the ground and support official veterinary authorities. They also play a crucial role in certifying animals and animal products for trade and maintaining border biosecurity. They also advise animal owners on compliance with health and welfare requirements. Widening the veterinary team to include other qualified and licensed professionals, who can either carry out biosecurity work or alleviate pressure on veterinary surgeons, will strengthen our disease resilience. This will enable veterinary surgeons to carry out biosecurity work.

The current disciplinary process set out in the VSA involves assessing whether a registered professional has been guilty of disgraceful conduct. Disgraceful conduct refers to behaviour that falls far short of the conduct expected from registered professionals. It is backwards looking, focusing on past misconduct, rather than a person's current conduct and competence. The regulator's Disciplinary Committee only has the power to impose sanctions on people it deems to have committed serious professional misconduct or a relevant criminal offence. The only sanctions available to the Committee are to strike the individual off the register or suspend them. This leaves very little scope for proportionate, timely intervention or early support where concerns arise. This approach is poorly suited to a modern, prevention-focused regulatory system.

These issues were consistently raised through stakeholder engagement, including the recent public consultation.

Policy approach

We have carefully considered the recommendations made by the CMA to government in this area, as well as feedback from our recent public consultation. More details on these can be found in Annex I and on our consultation site [here](#). Information about aspects that will be in primary legislation, future secondary legislation, or decided by the regulator can be found in Annex II.

Licensing

A licence to practise is a way of regulating professionals. They must hold a licence in order to carry out specific tasks. It is considered best practice in regulating other vital professions, such as medical professionals.

A licence to practise enables the regulator to address concerns about competence, conduct or health promptly and proportionately, including before it grants or renews a licence. This is designed to increase trust between the professions and the public. Our consultation showed there is significant support for this approach.

A licence to practise:

- is important for protecting the public
- provides a mechanism for ongoing oversight by the regulator
- helps employers and consumers verify whether professionals are legally authorised to work in their field

We had consulted on the need for indemnity insurance as part of the licensing process. The responses to the consultation said this could indirectly discriminate against new graduates and those on maternity leave, so we have removed this requirement.

Recognising the contribution of all members of the veterinary team (veterinary nurses, allied veterinary professionals, veterinary surgeons) is fundamental to the success of these reforms. Each profession brings its own skills to provide wrap-around care for animals and maintain public health. This received substantial support within our public consultation and is an important step to maintaining public trust within the professions. It also helps maintain and improve animal welfare standards.

We see real benefits in all veterinary professionals being regulated by one body. This approach can ensure standards are aligned and increases the understanding of the wider veterinary team. It will streamline regulation and ensure consistency across the regulation of the whole veterinary team. Responses to the consultation were broadly positive for bringing farriers under the new VSA and regulating equine barefoot trimmers (who specialise in maintaining the hooves of horses without applying shoes) across the UK as AVPs.

“If the licence to practise is monitored and maintains a defined standard of competency, it would provide a solid foundation on which to build a unified regulatory approach. This would help guarantee that all practitioners are operating under the same expectations of quality, welfare, and professionalism.”

– consultation response

Schedule 3 of the VSA currently details what specific activities non-veterinary surgeons can complete. Detailing specific activities different professionals in primary legislation can complete is no longer considered best practice. Concerns about this were highlighted by the CMA.

Our approach is instead to empower the regulator to set, regularly review and update guidance about what activities all the different professions they regulate can complete.

This will:

- increase capacity within the veterinary sector
- ensure skills are fully utilised
- provide clarity to the public and wider profession about who is licensed to complete what tasks

All of this will also support the building of a thriving veterinary sector.

Maintaining provisions to enable non-licensed people, such as farmers and animal owners, to complete certain activities will be important in ensuring that high animal health and welfare deliver the benefits of disease prevention, environmental sustainability, and societal well-being.

Many AVPs already act under an exemption order or within the flexibility of Schedule 3 of the VSA, such as veterinary physiotherapists. In many of the areas where AVPs work, a veterinary surgeon needs to oversee diagnosis and treatment planning. Under new legislation, those professionals will be able to act autonomously. Recognising AVPs and their work as part of the veterinary team also received strong support in our consultation.

We will provide a transition period if necessary. This will ensure those who currently rely on Schedule 3 of the VSA, or exemption orders can continue to perform certain procedures until the exempted activities are brought within scope of the new legislation.

We reviewed the definition of an animal in the consultation, with the proposal to align it with the [Animal Welfare \(Sentience\) Act 2022](#). A minority raised concerns about this. However, we stand firm in our ambition to align our definition with the above legislation to ensure we continue protecting animal welfare. Limiting the definition of an animal to just mammals, would risk human health through zoonotic diseases such as highly pathogenic avian influenza. Failure to align the definition with other animal welfare legislation also risks a fracturing of the regulatory landscape. This could damage the UK's high standards of animal welfare, as highlighted by the [Animal Sentience Committee](#) earlier this year.

Fitness to practise

A well operated fitness to practise model can raise animal welfare by supporting professionals to meet the required standards and increasing consumer confidence in the veterinary professions. Aligned with best practice, this system should be based on 'current impairment' and support that can be given rather than a purely punitive process focusing

only on past misconduct. However, past misconduct may remain relevant, but only insofar helping determine whether a professional is currently impaired and poses an ongoing risk (for instance, through a pattern of repeating issues).

It is a way of ensuring all professionals holding a licence to practise have the right skills, knowledge, character, and health to operate safely in their profession. A fitness to practise process aims to offer the support needed to professionals to work safely. There will only be sanctions issued if there is a risk to animals, the public, consumers, or the reputation of the professions. There was support for these proposals from the public consultation.

'Current impairment' may refer to:

- serious misconduct (breaches of the Code of Professional Conduct)
- professional performance seriously below what is expected
- not having the necessary knowledge of the English language
- a conviction for a criminal offence

It could also refer to a long-term physical or mental health condition (or disability). Or if someone cannot work safely (for themselves or their patients) in the area they are working with reasonable adjustments in place. This includes substance abuse or alcoholism. Licensed professionals will not need to automatically alert the regulator upon diagnosis of a condition. But they should make use of occupational health assessments and reasonable adjustments through their employer, if available. The regulator will only get involved if either the:

- condition is affecting the individual's professional judgement
- individual is attempting to carry out work they are not able to perform safely

It is important that there are mechanisms in place for the regulator to protect animals and the public. This is especially if a professional is either failing to use their professional judgement or is demonstrating poor professional judgement. As per best practice for professional regulators, they must ensure there is both support for the professional and sanctions, if needed, to protect others. The responses to our consultation also raised the need for proportionality.

A concern about a professional's fitness to practise could initiate anywhere, including:

- members of the public: they can raise serious concerns about fitness to practise with the regulator - this is not the same as a complaints process
- clients of the professional: businesses should deal with dissatisfaction at the actions of a licensed professional, but a client can raise serious concerns about a professional's fitness to practise with the regulator
- colleagues of the professional: colleagues can raise these concerns directly with the regulator - the regulator will need to make sure there is protection and support for anyone raising concerns about their colleague's fitness to practise

- a professional's employer: employers should aim to support their employees through reasonable adjustments before referring to the regulator, if appropriate to do so
- the professional themselves: through a self-referral

A fitness to practise process should be supportive to professionals, but it is ultimately there to protect animals, the public, consumers, and the reputation of the professions. If someone is unfit to practise and is posing a danger, action needs to happen. Any sanctions should be proportionate in reducing the identified risk. Ensuring that only those who are fit to practise have a licence will increase the public's trust in the veterinary professions, supporting the sector to thrive.

The regulator would have the responsibility to prove 'current impairment'. They would need to prove it to the civil standard (on the balance of probabilities), as per best practice among other professional regulators. The risk of this opening the flood gates to many more cases was raised in the consultation. There was concern about the impact this could have on individual members of the professions.

While this is a potential risk, we assess that, as in other professions, the initial triage of cases will quickly and effectively filter out inappropriate cases. This will limit the amount of time individuals would have this hanging over them. There will also be clear parameters and guidance for those wanting to raise a complaint about the best way to do this. By introducing a fitness to practise scheme, this government is recognising that the delivery of a thriving veterinary sector relies on the professionals within it. There should be support to uphold standards where needed.

Policy details

The government recognises the need for more a more flexible and risk-based approach to professional regulation. We have taken account of consultation responses, evidence from the CMA, and best practice in other professions.

A licence to practise

Under a reformed VSA, we will bring in a licence to practise for all veterinary professionals. This will provide clarity and confidence to those who engage veterinary professionals, and ensure animal health and welfare is upheld across the UK.

Under possible new legislation, we would seek to align the definition of 'animal' with the Animal Welfare (Sentience) Act 2022, meaning that 'animal' would refer to:

- any vertebrate other than *Homo sapiens*
- any cephalopod mollusc
- any decapod crustacean

If the definition of 'animal' in the Animal Welfare (Sentience) Act 2022 changes, those updates would automatically apply to an updated VSA. This is an important step in making sure that all animals that are capable of feeling are treated appropriately. As with the inclusion of new AVPs, we will ensure that there are provisions for the transition of new species being considered "animals", and therefore falling under this legislation.

In possible future legislation, anyone performing veterinary or animal healthcare activities on any 'animals' must hold a licence to practise. Conducting veterinary or animal healthcare activities without a licence to practise will be a criminal offence. It is important that the definition covers the activities currently undertaken by registered veterinary professionals. It must also be broad enough to align with the activities undertaken by many AVPs. We will decide on the precise definition before bringing forward the new legislation. It will likely give the regulator the ability to regulate 'veterinary and animal healthcare activities', which could include, but are not limited to:

- examination and diagnosis of diseases, injuries, disorders or abnormalities in animals, including the performance or interpretation of diagnostic tests
- provision of advice, recommendations or care plans based on assessment or diagnosis, enabling opportunities for care to be continued by owners and carers
- medical, surgical, and therapeutic treatment of animals – this includes corrective, rehabilitative, supportive, and maintenance interventions
- performance of surgical operations, including anaesthesia
- regulatory activities such as veterinary certification and official controls

Types of licence to practise

To maintain flexibility for veterinary professionals and the regulator, there will be options for different types of licences depending on the circumstances.

A comprehensive licence to practise where a person is qualified and licensed to complete any activities permitted by their profession.

A conditional licence to practise where someone is not eligible for a comprehensive licence to practise but are still able to practise under certain conditions. The possible uses for this will not be listed in primary legislation and would be up to the regulator to implement.

These could include:

- disability - if someone is unable to meet all 'Day One Competencies' even with reasonable adjustments in place at the education or examination stage, a conditional licence could be provided – this ensures compliance with the [Equality Act 2010](#) and enables wide participation within the professions
- fitness to practise - where concerns about a person's fitness to practise are raised, the regulator may arrange for conditions to be placed on their licence

- time-limited - used where someone only needs to hold a licence for a short period of time
- newly licensed conditions - used to ensure competency of those who are either new to the register or for someone who has recently returned to practising after 5 or more years away
- transitional arrangements - used to enable the smooth onboarding of professions under statutory regulation, either due to them undertaking veterinary or animal healthcare activities, or there is an update to the definition of 'animal'
- temporary and conditional licence to practise - used for someone to be able to practise in certain conditions for a time-limited period, for example, for disease outbreak scenarios

Gaining and retaining and licence to practise

To gain a licence to practise, an individual would need to:

- hold an eligible qualification and meet the Day One Competencies - the regulator sets the competencies
- demonstrate they are fit to practise by self-declaring skills, knowledge, character and health - this stage may include a DBS check and the regulator can request additional information if required
- have a suitable level of the English language - the regulator sets the level required and it's assumed if English is their native language or the language of their qualification
- payment of fees - the regulator sets these and they will be different for each profession

The regulator would have the power to set the standards relating to licensing, renewal, and revalidation. They will produce guidance for each of the professions.

We agree with the CMA that this licence would need to be annually renewed, with additional re-validation at other periods. The requirements for a professional could include:

- confirming they are fit to practise - professionals need to confirm that their skills, knowledge, character, and health align with the regulator's requirements
- declaring any criminal convictions or warnings - receiving a conviction or warning will not automatically mean that the licence cannot be renewed or re-validated and an assessment of the person's fitness to practise may be required]
- paying fees - professionals will need to pay their annual fee to the regulator declaring completion of Continuing Professional Development (CPD)

Each profession will have a different CPD requirement for the amount of CPD that needs completing. Professionals will need to present evidence of this for the licence to be renewed and re-validated

There would be automatic barring offences. This means if someone is convicted of a certain offence, they would be automatically barred from gaining a licence to practise. If that professional already has a licence to practise, they will lose it upon conviction. This list would be at the discretion of the regulator, but would need to align with DBS standards. It so would likely include serious offences such as murder, sexual offences, modern slavery offences, terrorism, serious animal related offences, and drug or human trafficking.

If a licensed professional no longer wishes to practise, they can rescind their licence at any point. The exception is when in the middle of an active fitness to practise investigation where special permission is needed. Alternatively, they can choose not to renew or revalidate it. The regulator may hold on to the details of those who have previously held a licence to practise, subject to their data retention requirements under General Data Protection Regulation (GDPR). This would enable a smoother process for those who have had a break to regain their licence to practise.

The veterinary team

Expanding regulation to the wider veterinary team, will mean that all veterinary professionals will need to gain a licence to be able to practise.

“Protection of the title would not only enable better accountability, but also ensure standards of animal care and welfare are at the highest level possible.”

– consultation response

We agree with the recommendation from the CMA that the title of 'veterinary nurse' should be protected. There should also be an expansion of scope of the tasks veterinary nurses can perform. We also propose this should be the same for AVPs. New legislation will repeal the FRA, abolishing the Farriers Registration Council (FRC). This will enable the regulation of farriers in Northern Ireland, as well as the regulation of equine barefoot trimmers across the UK. There will be a process to ensure that all those who are currently regulated will be transferred over to the new system with minimal disruption.

Primary legislation would give the powers for new titles to be added to the protected list through secondary legislation. Consultation with those professions would take place through the regulator prior to the laying of any secondary legislation. Defra will continue to work with the regulator to support the development of the different educational and fitness to practise requirements for all the possible AVPs. We will also ensure that the voices of those professions are considered in these discussions. We propose to implement regulation in tranches to ensure a safe and orderly transition. This will allow sufficient time to develop profession-specific standards, education and fitness to practise requirements, and appropriate transitional arrangements.

The first professions for regulation will be:

- veterinary surgeon
- veterinary nurse
- farrier

The next tranche will include:

- animal or veterinary physiotherapist
- animal or veterinary osteopath
- animal or veterinary chiropractor
- equine dental technician
- cattle hoof trimmer
- equine barefoot trimmer

Possible further AVPs for regulation:

- veterinary technician
- animal or veterinary behaviourist

The transition of professions that currently do not have any statutory regulation will need managing to:

- ensure that there is not a gap in the provision of care
- make sure individual professionals are not indirectly impacted

There will be an appropriate lead time before regulation comes into force, allowing individuals to ensure that they can meet the requirements. Conditional licences could be used here.

Detailing specific activities that different professionals can complete in primary legislation is no longer considered best practice. We will, instead, empower the regulator to set, regularly review and update guidance on what activities all the different professions they regulate can complete. This will:

- increase capacity within the veterinary sector
- ensure skills are fully utilised
- provide clarity to the public and wider profession about who is licensed to complete what tasks

This will all support the building of a thriving veterinary sector.

Exemptions

To maintain flexibility and continue to support government's biosecurity efforts, current exemptions would remain in place. This will enable lay people (those who do not hold a licence to practise) to carry out certain acts, such as:

- minor medical treatments completed by owners, keepers, or employees

- non-invasive minor surgery completed by farmers
- vaccination of poultry
- poultry and fowl operations, such as beak trimming, comb removal, snood removal
- blood sampling for diagnostic or disease control purposes

Permissions for lay people to undertake marking and vaccination of badgers for bovine tuberculosis would be expanded to include Northern Ireland as well as England, Scotland, and Wales.

There will be the opportunities to add additional exemptions in the future through an Order, where needed.

Fitness to practise

Under new legislation, we will bring in a new fitness to practise system to replace the existing disciplinary processes. This will help maintain the high standards of the profession, while supporting individual professionals.

“[Fitness to practise reform] goes hand in hand with licensing reforms and is essential.”
– consultation response

We will design each stage of the new process to investigate and determine whether a professional is currently impaired in a way that makes them unfit to practise.

The regulator would develop policy and guidance about how it will apply the definition of ‘current impairment’. Broadly, this will look at the current risks to the public, animals, and the reputation of the professions, rather than solely focusing on past misconduct.

When the regulator becomes aware of a concern, they should conduct a triage of the case. Staff employed by the regulator should review the case to filter out any inappropriate or vexatious cases.

The regulator should then appoint case examiners. They should be at least 2 people (one lay person and one from the same profession as the professional being assessed) to review each case.

The regulator would determine the criteria for when a third examiner is needed. It would likely include where expert knowledge is needed, either from a specific veterinary professional, healthcare professional, or legal professional. They could also use a third case examiner to ensure there are no conflict-of-interest concerns. This is especially beneficial in smaller professions where it is possible the case examiner and licensed professional may know each other.

Case examiners can agree sanctions and actions with the professional.

The regulator can refer the case to a tribunal:

- if action or sanction (or both) has not been agreed, but they still believe the professional to have a 'current impairment'
- the tribunal (of three people) will examine the case, and can impose sanctions if it agrees that the professional is currently impaired
- the tribunal can impose sanctions or actions (or both) on the professional without the need for agreement

Within each of these stages, the case could be closed if there is little prospect of proving that someone's fitness to practise is impaired. In this instance, the case would not then pass onto the next stage. Information made available to the regulator at this time will include:

- an assessment report, from a health assessment conducted by an independent specialist
- a letter from their doctor containing relevant health information or an assessment of their ability to work (or both)
- relevant aspects of the professional's medical records

Medical records are only shared if the professional gives permission. There will need to be an understanding, however, that failure to consent to this may result in incomplete assessment of their current impairment. This could lead to stricter sanctions by the regulator to fully mitigate the risk of things they have not been able to fully assess.

The regulator may be able to request additional information, such as:

- testimonials from colleagues, clients, and professionals
- documentation from their current and previous employer

All information collected and assessed, will be done so in accordance with General Data Protection Regulation (GDPR).

“Veterinary professionals have a huge responsibility to the public in terms of upholding animal welfare, animal health, public health (One Health), and therefore should be fit to practise. They should uphold professional standards and not put the name of the profession into disrepute.”

– consultation response

Where there is a real risk of harm to the public, consumers, animals, or trust in the professions, the regulator will have the power to impose interim orders on a professional. This would place conditions on the person's licence or suspend them from practice altogether while the fitness to practise process is completed. Interim orders would be time-

limited to a maximum of 18 months and regularly reviewed to see if it is still required. Should the fitness to practise investigation take longer than the interim order, extensions to the interim order would need to be approved by the High Court.

An increased range of sanctions will be made available to the regulator. We agree with the recommendations from the CMA, that these will include:

- formal advice or warnings - this would be noted on the person's case in case of future concerns
- undertakings - a formal promise by the professional to either do something or not do something
- conditions on the licence such as supervision or to not do specific activities
- suspension of the licence for up to 5 years
- removal of the licence - the professional would then need to prove fitness to practise to the regulator

After 5 years the professional can apply to the regulator for consideration to regain a licence.

Voluntary removal is where, once a fitness to practise process has commenced, the regulator and professional agree to remove the licence to practise rather than complete the fitness to practise process. This would only be permitted where the licensed professional:

- is very unlikely to ever return to practising
- discontinuing practising rather than going through the full fitness to practise process will meet the public interest

“I particularly support a wider range of outcomes such as undertakings and conditions, including requirements for targeted CPD, reflective practice, and - where relevant - supervision/case consultation or restrictions from higher-risk work, to protect animal welfare, public safety and safeguarding.”

– consultation response

Failure to adhere to either agreed or enforced sanctions would re-trigger a fitness to practise investigation and may have impacts on what sanctions are available in the future.

Outcomes

We are grateful to everyone who took the time to share their views on the Licence to Practise and Fitness to Practise chapters of the consultation. Policy decisions in these areas have been informed by consultation responses, the CMA's recommendations, and best practice across the regulation of other professions.

Introducing a comprehensive licence to practise, alongside reform of the fitness to practise framework, will provide a stronger foundation for a modern and thriving veterinary sector.

These reforms will:

- strengthen animal health and welfare
- protect consumers
- uphold public trust by ensuring high professional standards and clear, proportionate fitness to practise processes

This means that only those who are competent and fit to practise can work in the sector. Crucially, reforming the regulation of veterinary professionals will also empower the veterinary workforce by:

- recognising the full veterinary team
- protecting professional titles
- expanding scope where appropriate
- enabling professionals to work to the full extent of their competence within a clear and trusted framework

Together, these changes are essential to supporting a veterinary sector that continues to serve animals, the public, and the wider economy with confidence.

The veterinary sector has evolved since the VSA gained Royal Assent in 1966, with multiple professions now involved to provide wrap-around care for animals. Fully recognising and regulating all these professions will allow for increased utilisation of the whole veterinary team and an extension of career opportunities outside of what is currently possible. Breaking down these barriers to opportunity will strengthen the veterinary workforce, support animal welfare, and help to grow the economy. All of which will be good for animal owners and consumers of veterinary services.

Regulation of veterinary or animal healthcare businesses

Veterinary services are a vital and growing part of the UK economy, contributing £6.7 billion in 2024 alone. It is, therefore, important to ensure that there is appropriate regulation of businesses to maintain standards to ensure the health and welfare of animals and support economic growth.

The Competition and Markets Authority (CMA) concluded that the current market structure for veterinary services for household pets is not functioning effectively and has resulted in significant consumer detriment. Where markets do not function well, consumers are left without the information, choice, or protections they need to make informed decisions. Addressing these issues aligns directly with this government's commitment to tackling the cost of living.

The need to legislative reform

When the VSA came into force in 1966, only veterinary surgeons could own a veterinary practice. The sector has since evolved, almost beyond recognition. Ownership of a veterinary practice by non-veterinary surgeons has been permitted since 1999. In recent years, the number of corporate-owned practices has risen, from 10% in 2013 to about 60% today, with many of these being owned by 6 large veterinary groups. This increased corporatisation has coincided with increased prices, with average prices growing 63% and average cost of treatments growing 53% between 2016 and 2023. This is compared to a general services inflation of 32% ([CMA, 2026, section 2.21\(g\)](#)). This structural change has not been accompanied by an equivalent update to the regulatory framework governing businesses. While many practices belong to the RCVS' Practice Standards Scheme (PSS), which offers accreditation against many clinical standards, this is not the same as full regulation of businesses.

At present, there are limited mechanisms to support effective competition. This is not inherently a problem if the market is functioning well. Where a market is not functioning well, the equilibrium of supply and demand is not met. This can lead to real issues for consumers and is the case in the veterinary sector. The CMA has noted that the structures that currently exist within the sector are leading to an adverse effect on competition within the veterinary market for household pets. This has led to an overspend of about £1 billion across 5 years within a £6.7 billion market ([CMA, 2026, table 15.1](#)). We would not expect to see this in a market that is functioning properly. This government has promised to tackle the cost of living for consumers, and the veterinary sector is a perfect opportunity to demonstrate this.

The CMA has proposed several orders that will put immediate requirements on businesses to start to tackle the competition concerns. New legislation to regulate

businesses is needed to continue these requirements for businesses, as well as allow flexibility for competition concerns to be tackled in the future.

Policy approach

Having reviewed the details of the recommendations from the CMA and the consultation responses, we will introduce regulation of veterinary and animal healthcare businesses. Full details can be found in Annex I and on our consultation site [here](#). Information on elements to be set out in primary legislation, further detailed in secondary legislation, or determined by the regulator is provided in Annex II.

Under new proposed legislation, a business operating in the veterinary or animal healthcare sector would be required to hold a licence in order to operate. Much like the regulation of individual professionals, operating a licensing system for businesses will ensure that standards are upheld.

Introducing a statutory licensing scheme for veterinary and animal healthcare businesses would provide a strong foundation for a thriving, sustainable sector. Licensing would ensure that all businesses meet clear, consistent standards across clinical governance, health and safety, and competition, supporting high-quality practice and professional integrity. These would support veterinary professionals to exercise their clinical judgment in the best interests of animal health and welfare, free from potentially conflicting commercial pressures. Proposals for introducing regulation for businesses received strong support in the consultation. It is also as well as being an important area of focus for the CMA in their recommendations to government.

“I think the proposed regulations would be a positive introduction for the profession to ensure that all premises are working within the law, with the best interests of the animal and client at heart.”

– consultation response

When having a licensing system, it is important that it is clear who has responsibility for upholding the required standards. It is important that standards relating to animal welfare are considered, monitored, and actioned by someone who is qualified to do so. In this case, a licensed (allied) veterinary professional. It is important that animal welfare and consumers are kept in mind when making business decisions. The consultation included a proposal to introduce a named responsible person, which received good support.

Inspections and the ability to gather information are a foundational part of any licensing programme. Enabling inspections will increase consumer confidence in both the regulator and the businesses that provide veterinary or animal healthcare services (or both). These are also important for maintaining animal welfare, as they enable the regulator to see the

locations in which animals are treated and ensure that they are compliant. The importance of this was highlighted by the CMA and during the consultation.

We agree with the CMA that the regulation of businesses should largely be outcomes-based. We therefore propose that regulation of veterinary and animal healthcare businesses should be predominantly outcomes-based, rather than highly prescriptive. This would allow businesses flexibility in how they meet regulatory standards. It would also enable the regulator to apply a rules-based approach in specific areas where that is necessary. For example, to help protect animal welfare, consumers or fair competition.

Operating a veterinary or animal healthcare business is a privilege which carries a huge responsibility that should not be held lightly. It is, therefore, only right that the regulator has the ability to take action if organisations are not maintaining the standards they should. As with regulation of individual professionals, there should be an aim to resolve issues constructively, with the regulator providing support where standards are not met. If, however, the risk is so great or there is no co-operation from the business, the regulator needs to be able to intervene. This will enhance animal welfare and consumer confidence by ensuring that concerns about standards are dealt with suitably and in a timely manner.

“With appropriate proportionality and flexibility, regulation of veterinary and animal healthcare businesses could strengthen standards while supporting a diverse and sustainable workforce.”

– consultation response

Together, these measures would support veterinary professionals to thrive, uphold animal welfare, protect consumers, and enable the sector to continue making a strong contribution to economic growth.

Policy decisions

Licensing businesses

In new legislation, we will define a veterinary or animal healthcare business as an organisation carrying out *veterinary and animal healthcare activities*, as defined in the “Regulation of Professionals” chapter. This will enable the definition to be flexed in the future, if needed, to capture new business models, such as telemedicine. The term “businesses” includes both the individual locations and a central business function, should one exist.

There are many business types that will be caught by this regulation, from large corporate groups operating multiple locations, to independent practices, and individual sole traders. There will be specific exemptions for businesses who are regulated in different ways, such as Government Veterinary Services which are indemnified by the Crown. Pharmacies and

businesses run by Suitably Qualified Persons (SQPs) are not included in this definition, as they are overseen by the Veterinary Medicines Directorate.

We recognise the need to ensure that requirements are proportionate to the potential risk that could be posed by each business type. As such, the standards required for all businesses will be the same, but the inspection process will vary based on the size and type of the business.

The scope of what the regulator will be looking for will broadly be:

- ensuring satisfactory animal health and animal welfare standards
- human health and safety
- ensuring that staff are suitably qualified, licensed, and adequately trained
- good governance, record and data keeping and alignment with professional and legal requirements
- safe and appropriate physical working environment, including equipment and facilities
- ensure policies align with the interest of the consumers, as well as their animals

Details of how those standards are applied will be for the regulator to determine. The regulator will provide guidance on how these standards should be implemented, with flexibility of application for different business types. The application of the above, through regulatory rules and guidance, will also be aligned with the Orders that the CMA will be bringing in. This includes the provision of written estimates for treatments, transparency of ownership, and a requirement to share data with the regulator.

To get a licence, all businesses would need to:

- register with the regulator
- pay their licensing fee to the regulator
- name the licence holder or business owner
- name the 'named responsible person' (if different to the licence holder or business owner)
- self-declare compliance with the standards

Depending on the business type, and the assessed profile of that business type, some businesses may also need to:

- provide evidence of compliance with the standards
- undergo an inspection

Where business requirements overlap with requirements under other regulations, approval from other regulators can be used as evidence, to avoid unnecessary duplication.

If an inspection is needed prior to the issuing of a licence, a provisional licence may be granted by the regulator. This is to enable business and animal care to continue.

Responsibility

We propose that there be a licence within each business and a named responsible person at each location and at a business level. The requirements of these roles are:

- the licence holder will hold ultimate responsibility for the adherence to standards for the business
- the named responsible person at each location would have responsibility over the clinical aspects of the standards
- the named responsible person at business level, if applicable, will have responsibility for the setting of clinical standards at a corporate level

For sole traders, the individual would be both the licence holder and named responsible person. For smaller businesses, it could be the same or a different person. As such, they will be responsible for maintaining the standards expected of veterinary and animal healthcare businesses.

All named responsible people will be given statutory independence and autonomy (similar to Data Protection Officers) including protections to protect them from unfair dismissal or detrimental treatment.

Details of the Licence Holder and Named Responsible Person's responsibilities in different scenarios are detailed below.

A licence holder's responsibilities would be:

- human health and safety
- ensuring staff are suitably qualified, licensed, and adequately trained
- safe and appropriate physical working environment (general)
- good leadership and staff welfare
- ensuring policies align with the interest of the consumers, as well as their animals

A named responsible person's responsibilities would be:

- animal health and welfare
- responsible management and usage of medicines, if applicable
- good governance, record and data keeping and alignment with professional and legal requirements
- safe and appropriate physical working environment (equipment and facilities)

Inspections

The ability to carry out checks is a vital part to the success of any regulatory system. As set out in the consultation, and in accordance with recommendations from the CMA, the regulator will have the power to carry out inspections. The categories of inspection will be:

- routine - these would be conducted either prior to a business and or location (or both) being awarded a licence or at a set time after the previous inspection
- risk-based- these will be used where a risk assessment determines that a visit might be required
- follow up - these will be used where a previous inspection has highlighted concerns
- enforcement visits - these will be used when the regulator has evidence of breaches of the required standards and only aspects related to the potential breach will be investigated

The power for the regulator to carry out inspections will be accompanied by powers of entry. It will be an offence for someone to deny authorised inspectors entry to a premises. If entry is repeatedly refused, the regulator would be able to apply for a warrant from a Magistrate (England, Wales and Northern Ireland) or Justice of the Peace (Scotland) to force entry. They would grant this only in limited and specific circumstances.

Reasonable notice would need to be given to the business or location (or both) ahead of an inspection, except in exceptional circumstances:

- where giving notice would counter the purpose of the visit
- where reasonable efforts to agree an appointment have failed
- in an emergency situation, where waiting the notice period would risk seriously damaging animal or public health

The regulator would have powers to acquire information for the purposes of monitoring compliance, without visiting the premises. This would include information kept outside of a specific location, for example at a head office, where relevant. This would include requiring business owners to provide information and documents and answer reasonable questions.

“If there is a concern there must be the ability to investigate freely to protect animal welfare.”

– consultation response

As per best practice for other regulators of businesses, the regulator would have additional powers associated with its power to inspect and powers of entry:

- search or seize
- observe and view
- require explanations
- seek or require information or records
- take copies of documents
- ascertain compliance with regulations
- take people and equipment into a premises when exercising the power of entry

- survey or test
- examine and investigate
- direct premises to be undisturbed
- take measurements
- take photographs and make recordings
- take samples
- take possession of and detain substances or articles found

A receipt of what is taken would be given to the licence holder.

Some businesses will be operating from a private dwelling. It would not be expected that these locations have regular in-person inspections. The regulator would, however, still be able to request information from the licence holder or business owner (or both). If that information is not made available, and a risk assessment notes significant concerns, then a warrant may be sought to enable an in-person inspection.

For enforcement to be proportionate, not all powers will be considered suitable in all circumstances. For example, consumer or competition concerns may be better suited to requests for information. In contrast, concerns about the safety of equipment in use may be better suited to a physical visit.

As with the setting of fees for business regulation, the regulator would set the fees for inspections. These would be on a cost recovery basis.

Following an inspection visit, a written report of the inspection would be provided to the regulator. The premises and veterinary and animal healthcare business (if part of a group) would receive a summary copy. The regulator would be required to publish an inspection report online showing whether the business is compliant with the standards. The report would include with any minor, major and critical breaches identified and explained. If the report demonstrates that the premises is operating within the standards, it would be licensed.

Concerns about a business could be raised by the public or veterinary professionals.

Evidence that is uncovered during routine, risk-based spot inspections and follow-up inspections could be used as evidence of shortcomings of an individual licensed professional in a fitness to practise examination. This will not, however, be the case during warranted visits.

An important part of the inspection of businesses is also the interactions with the Veterinary Medicine Regulations 2013 as amended (VMR). The VMR is the responsibility of the Veterinary Medicine Directorate (VMD). Currently, businesses who are part of the RCVS's PSS are assessed against the VMR by the RCVS, and all other veterinary practices are inspected by the VMD. The requirement under a reformed VSA will mean that all veterinary and animal healthcare businesses will require licensing. However,

consideration needs to be given to ensure that the VMD maintains its oversight of the VMR while not unnecessarily increasing the inspection burden on businesses.

Sanctions and penalties

If the business is not considered to be operating within the standards required, there will be several options for the regulator. This will depend on the circumstances and severity of the breach.

If there is no immediate risk to the public or animal health and welfare, the regulator will have the power to:

- provide advice and guidance on improvements
- impose a fine for any shortcomings in the standards
- conduct additional inspections
- issue an improvement notice to the location or veterinary business

An improvement notice would be issued in writing to the location and veterinary business. The notice would set out where the business has not met the standards, what is required to achieve compliance, and the timescale to achieve this. The business would be able to continue to operate. Business owners and the named responsible person would be responsible for making sure that the work is carried out within the timeframe set out in the improvement notice. Inspectors would follow up with the premises to ensure that they have made the improvements necessary, including through a re-inspection as required.

The aim of these notices would be to work constructively with the locations and veterinary business, providing clear information to guide them to be able to achieve the necessary standards. This would thereby limit the impact of the non-compliance.

Failure to comply with all or any of the improvement notices would be an offence. The appropriate enforcement would need to be reflective of the offence committed. For example, the enforcement action taken for shortcomings relating to animal welfare may vary from the route taken in response to issues with consumer and competition requirements.

Where a critical breach is identified or it is assessed that there is immediate risk to the public or animal health and welfare, the regulator will have the power:

- to suspend the licence - this would be an immediate stop notice for the premises, which would prohibit activities in part or all of the premises until the issue has been resolved
- to remove the licence of the premises

Removing the licence of the premises would only be used as a last resort, where all other options have failed to resolve the issues with the standards.

If the business were then to be taken over by a new owner, a new application for a licence could begin.

Sanctions will be regularly reviewed to make sure that they are still appropriate.

Outcomes

Introducing statutory regulation of businesses through a licensing regime will provide a clear and consistent framework for all providers, from large corporate groups to independent practices and sole traders. By strengthening oversight of veterinary businesses, the proposed framework will help ensure that while animal welfare remains at the heart of service delivery, consumers are not forgotten, regardless of ownership model. Clear expectations around transparency, standards, and accountability will support veterinary professionals to exercise their clinical judgment in the best interests of animal health and welfare. They can do this free from potentially conflicting commercial pressures. At the same time, improved competition and consumer protection will build trust with animal owners, encouraging timely and appropriate access to veterinary care.

Taken together, these reforms will modernise the regulatory framework to reflect how veterinary services are delivered today. By introducing proportionate business regulation, we will help create the conditions for a veterinary sector that can thrive. This includes upholding animal welfare, supporting professionals, protecting consumers, and continuing to make a strong contribution to economic growth.

Support for consumers

This government was elected on a mandate to grow our economy. This cannot happen without consumer confidence.

One of the concerns often raised about the current VSA is that it does not address protections for the consumer (or clients) of veterinary services. Our proposals for changes to regulation of professionals and the introduction of regulation for businesses will help to address this. It is important to remember, however, that there will still be instances where consumers are unhappy with the service they have received. This should be dealt with in a proportionate and timely manner to maintain confidence in the professions and the veterinary sector.

Failure to do this could lead to a loss of confidence in the sector. This could lead to animals not being taken to see a veterinary professional, which could, in turn, have economic impacts as well as impacts for animal health and welfare.

The need for legislative reform

We did not specifically ask questions on consumer matters during the consultation, instead choosing to await comments from the CMA. We did, however, still receive quite a lot of comments on this matter.

One of the main concerns consumers raise about the veterinary sector is the information asymmetry that exists. This often appears in industries involving highly qualified professionals. It is not possible to upskill all members of the public to the qualifications of veterinary professionals. However, one area of information that we can make available to consumers is the services offered by veterinary businesses and the prices they charge for them.

Under the current system there is also little means for redress where there are concerns or complaints about the care that has been delivered. All clients can raise a complaint with the Veterinary Client Mediation Service (VCMS), which provides free and independent mediation where concerns about a practice have been raised. As this is currently a voluntary service, however, there is a discrepancy in how complaints are managed across the industry. There are with concerns that consumers are not always given the support and redress to which they may be entitled.

Policy approach

Ensuring that there are suitable mechanisms for redress is vital in maintaining confidence with the veterinary professions and within the veterinary sector. Something that is required for the sector to thrive.

By strengthening oversight of veterinary businesses, the proposed framework will help ensure that while animal welfare remains at the heart of service delivery, consumers are not forgotten, regardless of ownership model. This would empower consumers to make informed choices about their veterinary and animal healthcare provider, strengthening trust and confidence in the sector.

Clear requirements around complaints handling, mediation, and redress will ensure that concerns are addressed fairly and consistently, without defaulting to disproportionate regulatory enforcement. Increased transparency around services, prices, and ownership, supported by data-sharing arrangements recommended by the CMA, will empower consumers to make informed choices and encourage competition.

There is currently mediation available to consumers through the VCMS. At the moment, participation is optional for businesses, and knowledge of this offering among consumers is low; as such, uptake of mediation is low. As part of the new business regulations, first opinion practices for household pets will need to take part in a mediation service. They will need to do this either through the VCMS or another dispute resolution provider. This is to align with the recommendation from the CMA. There will be the possibility for this to be extended to all businesses through licensing requirements set by the regulator, should the need become apparent.

One way in which redress can be provided is through an Ombudsman service. An Ombudsman is an independent and impartial body that investigates complaints from the public when they believe an organisation has acted unfairly, wrongly, or provided poor service. In addition, the complaint has not been resolved through the organisation's own complaints process. An Ombudsman also has good oversight of the sector as a whole and can provide advice to all businesses before systematic problems occur.

As is the case with other Ombudsman services, this would be free to use for members of the public, with its costs paid for by a levy on businesses. The Ombudsman will apply to all businesses, rather than those only providing first opinion services to household pets. This will enable a greater oversight of the sector as a whole, which will lead to benefits for all businesses and consumers. The levy on businesses will be graded depending on business type or size (or both). This is to ensure those with the broadest shoulders carry the greatest portion of the costs.

Policy details

Data sharing

Through their order making powers, the CMA will work with the RCVS to bring in a data sharing scheme. This will update the current "Find a Vet" system. This will allow consumers to not only see the veterinary professionals and businesses in their area, but also information on ownership and price lists for common treatments provided by the business. Consumers can also compare businesses in their area and choose the business

which they think will best cater to their and their pet's needs. To help this to continue to drive competition in the area, the CMA has recommended that the data sharing between businesses and the regulator be put on a statutory footing. This can be done in secondary legislation made under the Data (Usage and Access) Act 2025. A separate consultation will be needed for this, which will be completed in due course.

The CMA has also recommended to the regulator that they continue with something akin to the current PSS, which will allow consumers to differentiate between services. Through this, consumers will be empowered to distinguish between more basic and more premium services. They then make an informed decision about which care to engage for their animals. Many organisations such as the British Veterinary Association and the International Society of Feline Medicine already offer an accreditation scheme, which would be encouraged to continue.

Consumer redress

Our proposals for ensuring that there are mechanisms for redress will be three-fold, in line with the recommendations from the CMA.

In new legislation, we propose to:

- ensure that all businesses have an in-house complaints system
- ensure that all first opinion practices for household pets engage in mediation
- create provision for binding adjudication for all consumers of veterinary and animal healthcare businesses, possibly through a new Ombudsman service

Compliance with the requirement to have an in-house complaints system will be checked by the regulator as part of the licensing process. The regulator will provide guidance on what needs to be included in this policy to enable businesses to comply and support their consumers. Details of the complaints process will need to be available to members of the public.

We will also be instructing the regulator to ensure there is a mechanism for binding redress, possibly through setting up an Ombudsman service for the veterinary sector.

An Ombudsman would only get involved in cases where the in-house complaints service and mediation, if applicable, have failed to produce a satisfactory outcome. The concerns can only be against a business, not an individual; these would, instead, fall under the remit of the regulator.

An Ombudsman would listen to concerns raised by individuals, and review information submitted by businesses, before deciding if any action is needed to respond to the concerns. If the Ombudsman finds in favour of the consumer it could:

- order an apology
- require compensation to be paid

- mandate an organisation to fix a mistake
- recommend changes to policies or procedures

These decisions, if agreed by the consumer, will be legally binding on the business. This is aligned with how an Ombudsmen services operate in the financial, housing, energy, communications, and legal sectors.

If an Ombudsman is pursued, upon the proposed legislation coming into force, the regulator will put out a tender for an organisation to fulfil the duties of an Ombudsman. A new or existing organisation could take this on. In the intervening time, the chosen organisation will be able to carry out its functions, but its decisions will not be legally binding on businesses.

Outcomes

Business regulation is essential to strengthening consumer confidence. A clear and publicly available complaint process will support consumers in feeling that their concerns have been adequately addressed. These concerns will be handled in a separate organisation to the regulator, ensuring this remains proportionate. Data sharing arrangements, which will support increased transparency, will enable consumers to make informed decisions that are right for them and their animals. It will also encourage competition within the sector.

While many practices currently take part in voluntary schemes, such as the RCVS' PSS or mediation through the VCMS, these are not substitutes for consistent, enforceable regulation. The voluntary nature of these arrangements has led to inconsistencies in standards, transparency, complaint handling, and consumer redress across the sector. Introducing a mandatory redress system will ensure that all consumers have options available to them if they have concerns about the care and services they and their animals have received. This process will also ensure that learnings from within the sector are shared with all businesses to continue protecting consumers in the future.

Governance

Any new legislation must be supported by a governance structure that is fit for purpose. One that:

- protects the public
- supports the needs of the professions
- aligns with the government's wider ambitions for economic growth, regulatory reform, and public confidence in services

Clear governance is not an end in itself; it is an important enabler of a sector that can adapt, innovate, and thrive.

As with the previous chapters, it is important that new legislation is not just fit for purpose in the present day, but also in the future as well. The veterinary sector will continue to evolve in response to changes in workforce models, business ownership, consumer expectations, and technological advances.

Governance shapes how decisions are made, who holds responsibility, and how powers are exercised, providing the framework through which organisations are directed, controlled, and held to account. Clear, proportionate governance is essential to supporting veterinary professionals, safeguarding animal welfare, maintaining public confidence, and enabling sustainable growth across the sector.

We would like to extend our thanks to everyone who responded with their views on the Governance chapter of the consultation. We would also like to thank the RCVS for the work they have completed thus far as the regulator for the veterinary profession. We also thank them for their willingness to accept the new challenges and requirements needed to ensure that animals and the public are protected. We are also grateful for the input of the Regulation Directorate from Department for Business and Trade, and HM Treasury, the CMA, and the team at Department for Health and Social Care for their support and input. All these engagements have helped to shape the governance proposals.

The need for legislative reform

The current governance framework, rooted in the VSA, no longer provides sufficient clarity or flexibility to meet the needs of a modern veterinary sector.

The current set up of the regulator has left many both inside and outside the professions confused about its role. Although the RCVS states clearly that it acts in the public interest, its title as a "Royal College" can create uncertainty. In other sectors Royal Colleges are often optional organisations to join which offer professional leadership, recognition of excellence, or representation. The fact that qualified veterinary surgeons are referred to as MRCVS (Members of the Royal College of Veterinary Surgeons) further confuses the

picture by suggesting that membership is optional for professionals, rather than a requirement in order to practise.

This lack of clarity is compounded by the fact that the RCVS conducts both upstream and downstream regulation. Downstream regulation refers to the core activities of the regulator including registration and disciplinary matters, the purpose of which is to protect the public by setting and upholding standards. Upstream regulation ensures that professionals and veterinary and animal healthcare businesses are supported to follow best practice, and that continuous learning is encouraged to prevent harm before it occurs. While these roles are not incompatible, their existence within a single body without clear structural separation risks undermining transparency, public understanding and confidence in the system.

It also acts as both a regulator and professional leadership body through its Royal Charter powers, which enables it to regulate registered veterinary nurses and run its Practice Standards Scheme. While it currently operates for the good of the public, there have been concerns about a lack of clarity in its structure, powers, and duties.

Many veterinary nurses and AVPs currently feel left behind by the VSA not being updated to allow more collaborative working, as part of a wider multi-disciplinary veterinary team.

The case for reform is also driven by the expanding scope of regulation. New legislation will introduce the regulation of all veterinary professionals, veterinary businesses and embed consumer and competition considerations alongside animal welfare, public protection, and professional standards. This represents a significant broadening of regulatory responsibility. Market and economic regulation require clear objectives, appropriate powers, strong governance, and robust oversight to ensure that decisions are proportionate, transparent, and consistent. Without reform, the existing governance framework is not well placed to manage these competing priorities effectively.

Policy approach

“A governance framework that is inclusive, balanced and proportionate will support public confidence, professional identity and the long-term stability of the reformed regulatory system.”

– consultation response

Our approach is guided by the government’s [Regulatory Action Plan](#), published in October 2025. This plan aims to tackle the complexity and burden of regulation, reduce uncertainty across the regulatory system, and challenge and shift excessive risk aversion in the system. These ambitions are particularly relevant to a modern veterinary sector operating in a consistently changing environment. Our approach is further guided by the

recommendations from the CMA (Annex I) and the outcomes of our consultation, which can be viewed [here](#). Further detail on which elements will be covered in primary legislation, addressed through secondary legislation, or left to the regulator is set out in Annex II.

Getting the governance structure right is fundamental to the success of the new legislation. We have designed the governance proposals based on:

- best practice in other professions
- advice from the CMA
- feedback from the consultation
- careful consideration of where it might be appropriate to diverge from other professions' practices

The Professional Standards Authority for Health and Social Care (PSA) is an independent body which oversees the activities of 10 statutory health and social care regulators. It recommends 6 main principles for governance, performance, and public protection. It says that regulators should act in a way that is:

- proportionate
- consistent
- targeted
- transparent
- accountable
- agile

These principles are central to our proposed governance reforms and reflect our commitment to regulation that protects the public while enabling professionals and businesses to flourish.

Having reviewed the consultation responses and had extensive discussions with the RCVS, the CMA, and other stakeholders, we agree that there are benefits to keeping professional leadership and regulation within one organisation. We are continuing discussions with the regulator about the practicality of delivering all these responsibilities within a single organisation. This is to ensure the requirements are realistic and achievable. If it becomes apparent that this scope is not manageable for one organisation, we will consider separating the professional leadership function from the regulator.

Involvement of all the veterinary professions within the regulator will be vital to the success of this legislation. Many AVPs and veterinary nurses noted that they do not currently feel involved in discussions about the wider veterinary sector. We will tackle this by ensuring that there are opportunities for all professions to engage in the discussions around how legislation is applied to their profession.

In accordance with best practice, the RCVS will be led by a Board which will be composed of 12 individuals. 6 of whom will be veterinary professionals and; the other 6 will be lay

people. Decision making powers for the regulator would sit with the Board. They may choose to delegate some matters to other Committees. The Board would remain ultimately responsible for the actions of the regulator and accountable for decisions. Where appropriate, they should be able to delegate day-to-day operations to its Committees, who in turn would report back into the Board.

Under proposed new legislation, the regulator would have fee raising powers, as long as they align with the corporate strategy and are conducted on a cost-recovery basis. There should not be cross-subsidies of fees. All licensed professionals and businesses will pay a single fee to the regulator, and the regulator would allocate money to the regulatory and professional leadership arms. The regulator should publicise the rationale for fee allocation in its annual report to Parliament and its corporate strategy and expenditure plan. This will ensure clarity is provided for licensed businesses and licensed professionals on what their fees are spent on, ensuring transparency for all businesses, professionals and the public.

A regulator needs to have the authority and associated powers to carry out the regulatory work set out in the previous chapters. Having the appropriate actions available to them will mean that the regulator is able to:

- uphold animal welfare
- support the veterinary professions and the individual professionals
- regulate businesses
- ultimately support the veterinary sector to thrive

The regulator will have many responsibilities including for animal health and welfare, for public health, and for market regulation. These are 3 areas that are incredibly important to this government, as such there needs to be a reasonable level of oversight of the regulator's activities.

Policy details

Scope of the regulator

Taking on market and economic regulation is a big responsibility for a regulator. The Secretary of State for Environment, Food & Rural Affairs will be able to provide strategic steers to the regulator. This will support the regulator to, where appropriate, take account of government priorities, manage competing priorities and exercise discretion. These steers would take place at least once per Parliament, but could be more regular if the need arose. Such steers would be timely and take account of regulatory planning cycles whilst supporting independence in regulator decision making. There would be a legal duty on the regulator to "have due regard" to the steers. The regulator would also be able to request a steer from the Secretary of State outside of these meetings, if it deems this necessary. There will be regular check in meetings every 6 months between the regulator and Defra Secretary of State (or appropriate delegated minister).

The regulator's responsibilities would be to:

- ensure veterinary professionals protect and maintain the health and welfare of animals and the public
- promote and protect public confidence in the veterinary professions
- promote and maintain proper professional standards and conduct for members of those professions
- protect the interest of consumers of veterinary services, where this does not contradict with its animal welfare requirements
- promote and protect fair competition within the market, so far as is reasonably possible

These responsibilities will be accompanied by duties for the regulator, and the regulator will have powers to deliver those duties.

More information on how duties and powers will work can be found in Annex III.

Structure of the regulator

Having reviewed the consultation responses and had extensive discussions with the RCVS, the CMA, and other stakeholders, we agree that there are benefits to keeping professional leadership and regulation within one organisation. We are continuing discussions with the regulator about the practicality of delivering all these responsibilities within a single organisation, to ensure the requirements are realistic and achievable. If it becomes apparent that this scope is not manageable for one organisation, we will consider separating the professional leadership function from the regulator.

“It just needs to be clear what the responsibilities of the individual governance sections are whatever they turn out to be.”

– consultation response

Assuming the regulator retains professional leadership, there will need to be increased clarity between the regulatory and professional leadership functions. This will include increased clarity on the structure of the regulator and how decisions are made. As set out in our consultation, the regulator will have an overarching Board, which will oversee all activities that the regulator completes. This is necessary to enable effective decision making and reduce possible duplication of effort.

Underneath the Board will sit the two “arms” of the regulator: “regulation” and “professional leadership”. Under the regulation arm the regulator's activities will include:

- professionals - licensing, renewals and revalidation, including education requirements for gaining a licence to practise, Continuing Professional

Development (CPD), day one competencies, and also codes of professional conduct, activities to support professionals to meet standards and fitness to practise

- veterinary and animal healthcare businesses - licensing, including setting of standards, inspections, investigations, sanctions and activities to support businesses to meet mandatory standards

Under the professional leadership arm, activities could include:

- cross-profession activities, such as: academy, environment and sustainability, workforce, 'promoting the art and science of veterinary and animal healthcare, support for RCVS Knowledge
- curriculum development and implementation for specific specialisms
- non-mandatory veterinary business and animal healthcare standards
- professional leadership
- careers advice
- career development
- educating the public on care for animals and how to interact with the professions
- fellowships and awards

The objectives of the professional leadership arm are not a matter for primary legislation. Instead, we will be proposing that the regulator contacts the Privy Council to arrange an update to their Royal Charter. This will mean that regulatory matters will be set out in a new VSA, and professional leadership activities will be enabled through the updated Royal Charter. While all activities will be performed in the public interest, activities within the professional leadership arm under the Royal Charter will have a greater focus on the professionals themselves. This is recognise that it is in the public interest to have veterinary professionals who are supported.

“Governance and the splitting of the regulatory and registration functions is necessary for independent oversight and public confidence in the veterinary professions”

– consultation response

Within the professional leadership arm, there will be presidents for each of the 3 faculties (1 each for veterinary surgeons, veterinary nurses, and allied veterinary professionals). These presidents will be a member of the profession over whom they will be presiding. One of these presidents will be elected to act as a “Chief President”. They will report into the Board as the main accountable person for professional leadership policy. The CEO will remain accountable for delivery of all organisational objectives, but they will need to have regard to a guidance of the “Chief President” regarding the delivery of professional leadership activities.

Members of the Board will be appointed following a rigorous appointment process to ensure the Board holds the required experience and expertise, rather than through an elections process. Senior members of the regulator would recommend candidates to the Privy Council for appointments. The independent oversight body would oversee this process to ensure it is fair, but it would not make any comments or recommendations on the individuals appointed. The composition of the Board could be updated in future via secondary legislation, if consideration of best practice changes. There will be a requirement for the Board to bring in people with skills and expertise in particular areas when important decisions need to be made. This will happen if they do not have the required skills on the Board. Both the CEO and “Chief President” would attend Board meetings, but would not be members of the 12-person Board.

All professions that are regulated (veterinary surgeons, veterinary nurses, and allied veterinary professionals) would have the opportunity to be appointed to the Boards and Committees. To ensure the right skillsets, appointments could be based on:

- experience (including regulatory, educational, clinical)
- areas of expertise (including public health or biosecurity, companion animal, livestock or equine) in line with a One Health approach
- geography (the four nations of the UK)

This could mean that, at any one time, there may not be parity or proportional representation of all the professions on the Board or Committee. The only Committees that would be set out in legislation would be the ones managing the professional fitness to practise processes and the business sanctions. The development of other Committees will be for the Board to determine.

Under proposed new legislation, the regulator would have fee raising powers, as long as they align with the corporate strategy and are conducted on a cost-recovery basis. New fees or changes to fees will not require secondary legislation or government approval. However, the regulator should:

- consult publicly on its corporate strategy and expenditure plans every three to five years
- explain the rationale for fee changes (including cost drivers)
- publish a costed corporate plan outlining how fees would be used to meet statutory objectives

Recognising how important post-nominals are to individual veterinary professionals we propose that these can be kept for those who hold a licence to practise. Balancing this with the need to provide clarity for the public and professionals about the role of the regulator, we propose that the regulator introduces post-nominals specific to each profession that do not relate to membership. These would be RVS (Registered Veterinary Surgeon), RVN (Registered Veterinary Nurse) or RAVP (Registered Allied Veterinary Professional - followed by the specific profession, for example RAVP (Farrier)).

In order for the regulator to have a name that truly represents its activities, we suggest to the RCVS that they consider asking for a name change, when working with the Privy Council on a renewed Royal Charter. We recommend that the RCVS consult its current members and future licensed professionals to develop a new name.

Oversight

Under these proposals, the regulator would be formally required to submit an Annual Report and Accounts to the UK and devolved governments. These reports would be laid in Parliament and expected to include:

- mission, purpose, organisational overview, SoS steers received and actions taken to achieve them
- summary of the year, including any significant events or achievements
- performance review, including operational results, KPIs, service delivery outcomes
- strategic priorities and objectives for future years
- risk overview, including principal risks, mitigations, and internal controls
- sustainability reporting
- market or sector context
- governance (Board, committees), including any changes to personnel, director responsibilities
- remuneration report, including salaries, bonuses, pension liabilities; dividends paid or proposed
- employee and stakeholder engagement statements
- financial statements including:
 - statement of Profit and Loss,
 - statement of Financial Position,
 - statement of Cash Flows,
 - statement of Changes in Equity
- legal and administrative information (registered office, auditors, company number)
- auditor's reports

Parliament would be able to scrutinise the regulator and question its leaders on performance, complaints, and activities through accountability hearings at the Environment, Food and Rural Affairs Committee (EfraCom).

This would include reviewing:

- how the policy is practically applied
- statistics on fitness to practise cases and enforced powers of entry
- the registrar's use of discretion in the licence to practise and fitness to practise processes analysis of the outcomes of any enforcement action

Additionally, we propose that there should be a body to oversee the activities of the regulator. We consider that an independent oversight body is best placed to provide this

function due to its expertise in scrutinising and assuring the performance of professional regulators. The oversight body would carry out this role by:

- reviewing the performance of the regulator
- auditing the use of powers (including removal of a professional's licence to practise, powers of entry, enforcement visits, and removal of a business' licence)
- reviewing how rules have been made or amended (or both)
- reviewing how the regulator has met and prioritised its objectives
- reviewing how the regulator has conducted consultations and how these results have influenced final decisions
- reviewing the appointments process to ensure it is fair and transparent
- reviewing the fee setting process and decisions, so ensure fairness and transparency
- reviewing the fitness to practise processes and outcomes

“Independent oversight is a cornerstone of good governance and public confidence”

– consultation response

In line with [oversight of other regulators](#), we are exploring opportunities for the oversight body to:

- set standards for regulators
- produce guidance to help them improve in specific areas
- ensure that lessons are learnt from past incidents
- scan the horizon for new developments which may affect regulation (for example, the future use of Artificial Intelligence (AI))
- share learning and feedback from its checks on regulators' final fitness to practise decisions.

Appeals

It is important in all areas of this proposed new legislation that there are opportunities to appeal against decisions that parties consider to be unfair.

Appeals will be available following a professional not being satisfied with a fitness to practise tribunal which went against them. These appeals will be heard in the High Court.

If an individual has their application for a licence to practise refused, they can appeal. First this would be to the regulator to ask them to reconsider if they have evidence suggesting that the regulator has made an error. If this is not successful, the professional would be able to request a Judicial Review by the High Court.

Appeals will be open to people if they have had sanctions imposed upon them at a tribunal. These appeals, which cannot be used simply because someone disagrees with them, will be escalated to the High Court. Appeals will not be available where sanctions or actions have been mutually agreed between a professional and case examiners. A professional would be within their right to request for a Judicial Review by the High Court but this would only be accepted under exception cases, likely following a serious procedural error.

Appeals will also be available to businesses throughout the licensing process and while undergoing inspections or being subject to sanctions. There would be a statutory right of appeal through either the regulator or to the General Regulatory Chamber of the First-Tier Tribunal, depending on the nature of the complaint.

As previously noted, consumers will have the opportunity to escalate concerns either through mediation or through a binding redress mechanism, such as an Ombudsman.

Outcomes

Effective governance is fundamental to a thriving, trusted veterinary sector. It determines how decisions are made, how powers are exercised, and how organisations are held to account. The sector plays a critical role in animal welfare, public health, consumer protection, and the wider economy. Therefore, governance structures must command public confidence, support professional standards, and remain capable of adapting to change.

Reforming governance through a modernised VSA will provide clarity and transparency for professionals, businesses, and the public. It will equip the regulator with the tools and structure it needs to operate effectively today, while remaining flexible enough to respond to future challenges. In doing so, it will help create the conditions for a veterinary sector that can thrive. This includes supporting animal welfare, protecting consumers, empowering professionals, and contributing to a strong and resilient economy.

Next steps

We will look to secure a Bill slot as soon as Parliamentary time allows in order to bring forward new primary legislation. Passage of the Bill will also allow Parliament to scrutinise our proposals before they become law.

Any new primary legislation would need a coming into force date, with secondary legislation to follow. Annex III details whether primary legislation, secondary legislation, or the regulator will deliver each aspect of policy. This phased approach will provide time for businesses, individual professionals, and the regulator to make required updates, as well as allowing flexibility for the future.

We are hugely grateful for everyone who took time to complete the consultation, or attend one of our stakeholder events, the feedback you provided has been vital in supporting the development of our policy position.

Annexes

Annex I: Detailed review of CMA recommendations

Recommendation 1

We recommend to the UK government to establish a replacement statutory regime for the regulation of veterinary services for household pets

Response: Accept

Description: We will bring in new primary legislation to replace the Veterinary Surgeons Act 1966 when Parliamentary time allows.

Recommendation 2

We recommend to government that veterinary businesses (and the practices they own) should be included within the scope of regulation.

- Annual reporting from businesses to the regulator:
 - Provide information requested, such as complaints data, information on services offered, staff qualifications, and ownership details
 - Declare compliance with standards

(Section 9.62)

Response: Accept

Description: This formed part of the consultation into reform of the Veterinary Surgeons Act 1966, and is proposed to form part of new legislation, which will be laid when Parliamentary time allows.

Recommendation 3

We have decided to recommend that (i) the requirements on veterinary businesses should, as a minimum, reflect the contents of our Order imposed on veterinary businesses, (ii) there should be a requirement to satisfy basic clinical standards, and (iii) regulation should apply at the organisational level to the legal person carrying on that business.

Response: Accept

Description: This formed part of the consultation into reform of the Veterinary Surgeons Act 1966, and is proposed to form part of new legislation, which will be laid when Parliamentary time allows.

Recommendation 4

Our recommendation is that while regulation should strike an appropriate balance between prescriptive requirements and the adoption of principles, a focus on outcomes where possible would be more proportionate and preferable in the longer term.

Response: Accept

Description: This is proposed to form part of new legislation, which will be laid when Parliamentary time allows.

Recommendation 5

We have decided to recommend to government that there should be a scheme for measuring and communicating to pet owners the quality of services that veterinary businesses provide.

Response: Accept

Description: The professional leadership part of the regulator will have the ability to continue an accreditation scheme, such as an evolution of the Practice Standards Scheme.

Recommendation 6

We are recommending to government that regulation of veterinary professionals should be strengthened, with regulatory requirements to better promote competition, to ensure that pet owners have information that enables them to choose between providers and services.

- Data sharing:
 - Development of a Smart Data Scheme to put a price comparison website on a statutory footing

(Section 1.23)

Response: Accept

Description: This is proposed to form part of new legislation, which will be laid when Parliamentary time allows.

Recommendation 7

We have decided to recommend to government that the regulator should have sufficient statutory powers and resources to enable the effective monitoring of compliance with regulation by both veterinary businesses and veterinary professionals.

- Regulator to be able to:
 - Request additional information

- Conduct inspections, both routinely and on a risk basis
- Publish details of disciplinary and enforcement actions

(Sections 9.63-65)

Response: Accept

Description: This formed part of the consultation into reform of the Veterinary Surgeons Act 1966, and is proposed to form part of new legislation, which will be laid when Parliamentary time allows.

Recommendation 8

We have decided to recommend to government that the relevant legal thresholds for regulatory action should be designed to ensure that enforcement action (against both veterinary businesses and professionals) can take place in respect of a much wider range of infringements than only the most egregious misconduct cases.

Response: Accept

Description: This formed part of the consultation into reform of the Veterinary Surgeons Act 1966, and is proposed to form part of new legislation, which will be laid when Parliamentary time allows.

Recommendation 9

We have decided to recommend to government that the regulator should be given a wide range of enforcement powers to address non-compliance with regulation by veterinary businesses, vets and vet nurses.

- Sanctions for professionals:
 - Undertakings
 - Formal advice and warnings
 - Interim orders
 - Conditions on the licence
 - Suspension or removal of the licence

(Section 9.76)

- Sanctions for businesses:
 - Undertakings
 - Issue advice/warnings
 - Interim orders
 - Fines
 - Impose conditions
 - Suspend/remove licence

(Section 9.75)

Response: Accept

Description: This formed part of the consultation into reform of the Veterinary Surgeons Act 1966, and is proposed to form part of new legislation, which will be laid when Parliamentary time allows.

Recommendation 10:

We are recommending to government that a comprehensive system for complaint handling and redress in the veterinary sector be established through (or using powers granted to a regulator by) legislation.

- Complaints and redress:
 - First Opinion Practices to have inhouse complaints system and engage in mediation
 - Setting up of a binding redress system, for where in-house complaints and mediation has failed to reach a satisfactory conclusion

(Sections 9.86-87)

Response: Accept

Description: As part of reforms into the Veterinary Surgeons Act 1966, we will make having an in-house complaints system and engagement in mediation mandatory for all businesses. We are continuing to explore the possibility of introducing a veterinary ombudsman service.

Recommendation 11

We have decided to recommend to government that the regulator should have statutory consumer and competition duties.

Response: Accept

Description: This formed part of the consultation into reform of the Veterinary Surgeons Act 1966, and is proposed to form part of new legislation, which will be laid when Parliamentary time allows.

Recommendation 12

We have decided to recommend to government a series of operational principles which guide the design of a future veterinary regulator.

- Strategic and operational independence for regulatory matters, accompanied by a clearly articulated and well-communicated purpose
- Ringfenced and guaranteed funding for regulatory functions

- Reduced size of boards and redesigned committee structure
- Membership of the governing board and committees comprising the appropriate expertise required to achieve their objectives
- Appointment of board members, as opposed to election by registrants
- Clear articulation and design of the role of a chairperson, to ensure they are not seen as a figure of professional leadership

(Section 9.131)

Response: Accept

Description: Our proposed set up of the regulator takes these into account the principles.

Points to consider 1

Government considers legislative reform that protects the title of veterinary nurse, reserving it to those holding relevant qualifications.

Response: Accept

Description: This formed part of the consultation into reform of the Veterinary Surgeons Act 1966, and is proposed to form part of new legislation, which will be laid when Parliamentary time allows.

Points to consider 2

Government considers changes to the VSA that expand the scope of tasks that may be performed by veterinary nurses.

Response: Accept

Description: This formed part of the consultation into reform of the Veterinary Surgeons Act 1966, and is proposed to form part of new legislation, which will be laid when Parliamentary time allows.

Points to consider 3

If an appropriate balance between:

- animal welfare, public health and environmental protection; and
- the need to ensure veterinary services in the UK can deliver competitive prices, innovation and growth in step with technological change and consumer demand

does not exist, they should consider changes to the Cascade so that it works better for pet owners and their pets, particularly in relation to the permissibility of taking treatment costs into account when prescribing certain medicines.

Response: Accept

Description: The VMD will consider whether changes are needed to the cascade guidance.

Points to consider 4

The VMD and the RCVS should consider acknowledging that cost is already a significant factor in the treatment of pets and clarifying the circumstances in which cost might be taken into account (under existing rules) when prescribing according to the Cascade, to deliver effective contextualised care.

Response: Accept

Description: The VMD will consider whether changes are needed to the cascade guidance.

Points to consider 5

The VMD should consider whether there is further scope to minimise the impact of the Advertising Restriction on competition and entry by online pharmacies, and the ability of FOPs to give pet owners the price information they need to make informed choices on where they purchase POM-V medicines they have been prescribed, without disproportionate negative effects on public and animal health.

Response: Accept

Description: The VMD will consider whether changes are needed to the advertising guidance.

Points to consider 6

Consider the way the framework takes account of animal welfare and public health considerations and competition and consumer interests and whether each of these factors is being given the appropriate weight given the developing nature of how veterinary services are now supplied in the UK.

Response: Accept

Description: The VMD will ensure we engage actively with RCVS and Defra colleagues so that the UK veterinary sector continues to thrive whilst considering each of these important points.

Points to consider 7

There may be opportunities to enhance competition if Defra, the VMD and RCVS keep under review, and actively identify, aspects of the regulatory framework that could be adjusted to enable more widespread, responsible use of Telemedicine.

Response: Accept

Description: The VMD will engage with RCVS and Defra colleagues on any opportunities to enhance competition.

Points to consider 8

The VMD and other relevant bodies (Defra and RCVS) should reflect on ways to further stimulate the re-classification of veterinary medicines to increase access to these products outside of the FOP setting.

Response: Accept

Description: The VMD will consider whether steps are needed to achieve this. Distribution categories provide controls on the sale or supply of veterinary medicines to ensure that appropriate advice is given at the point of sale so that products can be used safely and effectively. The distribution category of a veterinary medicine is decided by scientific assessors at the VMD following evaluation of the application dossier for granting a marketing authorisation. It may be changed following assessment of an application by the marketing authorisation holder, who submits safety and efficacy and pharmacovigilance data in support of this change.

Annex II: Primary Legislation, Secondary Legislation, Regulator

Licence to practise

Primary legislation:

- The need to have a licence to practise to perform veterinary and animal healthcare activities
- Scope of veterinary and animal healthcare activities
- Requirements for gaining a licence to practise
- Types of licence to practise available
- Ability to fine and convict people carrying out activities without a licence
- Professionals to declare themselves as fit to practise

Secondary legislation:

- Definition of veterinary and animal healthcare activities
- Exemptions

Regulator to determine:

- What procedures are appropriate for each profession to complete, and (if relevant) what additional items can be undertaken with further specialisation)
- What the detailed requirements will be for all professions to be able to gain their licence to practise, including qualifications, training, Day One Competencies
- Whether or not informal reviews of documentation will be allowed for when there are refusals to give licences to practise
- CPD requirements
- Ability to set its own licensing exam
- Revalidation

Members of the veterinary team

Primary legislation:

- Those conducting veterinary/animal healthcare activities (including farriers and specific AVPs) will be considered part of the team
- The dissolution of the Farriers Registration Council and removal of the Farriers (Registration) Act 1975.
- Members of the veterinary team will have protected titles

Secondary legislation:

- The titles to protect

Regulator to determine:

- Guidance on how the veterinary team should work together (whilst being aware of the need for autonomy)
- Code of conduct for each of the professions
- Remits for each profession

Fitness to practise processes

Primary legislation:

- Introduction of the three-stage fitness to practise process founded on the principle of “current impairment”

Regulator to determine:

- Standards on what it means to be fit to practise
- Details of the fitness to practise processes
- Timelines for a fitness to practise process

Fitness to practise sanctions

Primary legislation:

- Introduction of interim orders and automatic barring offences to protect the public and animals
- Need to wait 5 years to apply for licence after it has been removed
- Sanctions: suspension, undertakings, conditional licence (preventing work in specific areas), remove licence.
- Ability to give formal written warnings
- Appeals: to the High Court for professionals
- Review of sanctions and conditions placed on licences
- Failure to comply leads to referral back to the Fitness to Practise process

Secondary legislation:

- What offences will lead to automatic barring from licensing

Regulator to determine:

- Setting out the guidance for interim orders
- Setting out the guidance for voluntary removal
- Setting out the guidance on how complainants views will be considered
- How sanctions will be applied in different circumstances
- Setting out guidance on reviewal of sanctions
- Setting out guidance for failure to comply with sanctions

Business licences

Primary legislation:

- Requirement to have a licence to operate and meet minimum requirements
- General standards for all veterinary businesses
- Powers of entry, if needed, for veterinary inspections
- Exemptions for businesses already covered by other regulation, to avoid duplication for example abattoirs and Government Veterinary Services
- Statutory binding redress process for complaints

Secondary legislation:

- Definition of veterinary business

Regulator to determine:

- Set out sector-specific standards

Business regulation responsibility

Primary legislation:

- Need for a Named Responsible Person
- Overarching roles of the Named Responsible Person
- Regulator will be added to the Public Interest Disclosure Act

Regulator to determine:

- Setting out the guidance for the Named Responsible Person

Business inspections

Primary legislation:

- Allow the regulator to conduct inspections
- Allow the regulator to have powers of entry and other associated powers
- Offence to not allow entry or to obstruct an inspector

Regulator to determine:

- Set the policy of when to use different types of inspections

Business sanctions

Primary legislation:

- Regulator to issue sanctions where standards have not been upheld

- Offence to not comply with improvement notices

Regulator scope

Primary legislation:

- Regulation of veterinary professionals
- Regulation of businesses
- Objectives for the regulator
- Powers and duties of the regulator

Regulator structure

Primary legislation:

- Overall structure of the regulator to ensure clear differentiation between the regulatory and professional leadership functions
- Establishment of the Board, which will have decision-making powers, and the Fitness to Practise and Business Sanctions Committee
- Appointment process to the Board and Committees
- The regulator should produce a corporate strategy and expenditure plan

Secondary legislation:

- Size and composition of the Board

Regulator to determine:

- Committee structure

Oversight of the regulator

Primary legislation:

- The regulator should consult on any new regulatory rules proposed
- The regulator will be accountable to Parliament and the Devolved Governments
- The regulator will be accountable to an independent oversight body
- The regulator will attend 6-monthly meetings with the Defra Secretary of State
- The regulator will receive steers from Defra Secretary of State, with legal requirement to have regard to them

Secondary legislation:

- Changes to new rules following consultation

Annex III: Regulator Duties and Powers

Regulation of veterinary professionals: duties and powers

Duty:

Run a licence to practise scheme

Associated powers:

Provide licence to practise for professional regulation

Setting and collection of fees for professional regulation

Duty:

Protect titles for all regulated veterinary professions

Associated power:

Prosecute/sanction people for conducting veterinary acts without an appropriate licence

Duty:

Determine what activities can be conducted by people with a licence to practise

Associated power:

Set what activities can be conducted by people with a licence to practise

Duty:

Determine what activities can be completed by which profession

Associated power:

Set what activities can be completed by which profession

Duty:

Determine standards for professionals, including codes of conduct and actions to be completed by different professions

- Determine the level of veterinary surgeon required oversight
- Produce appropriate rules and guidance on allocation, delegation, direction, and supervision
- Develop guidance on how the activities should or could be carried out
- Consult with professions/public, where appropriate

Associated power:

Set codes of professional conduct for licensed professionals

Duty:

Maintain a list of those with licences for the different professions:

- Veterinary surgeons
- Veterinary nurses
- Allied veterinary professionals, likely to include:
 - Farriers
 - Animal/veterinary physiotherapist

- Animal/veterinary osteopath
- Animal/veterinary chiropractor
- Animal/veterinary behaviourist
- Equine dental technician
- Cattle hoof trimmer
- Equine barefoot trimmer
- Canine fertility specialist

Associate power:

Obtain appropriate documentation to ensure standards are met

Duty:

Maintain a list of the type of licence held:

- Comprehensive licence
- Conditional licence (all types)
- Temporary and conditional licence

Associate power:

Set standards for what conditions are permitted under what circumstances

Duty:

Determine standards for gaining and maintaining licence to practise:

- Qualification
 - Determine the qualifications that will be required to be able to gain a licence to practise, for each of the professions
 - Setting of Day One Competencies
 - Consult members of the professions that are being brought under the regulatory system for the first time
- Fitness to practise:
 - Have an independent fitness to practise process/committee, with no overlap on membership from other committees/the Board
 - Define current impairment
 - Run a fitness to practise process
 - Determining processes, rules and guidance for professionals when assessing current impairment
 - Application of sanctions if fitness to practise is currently impaired
- Fees
- English language requirements

Associated powers:

Set standards for licensing:

- Set qualification standards:
 - Set qualification standards and Day One Competencies for each profession
- Fitness to practise
 - Including obtaining a DBS check, where appropriate
- Fees
- English language requirements

- Indemnity insurance requirements

Set standards for fitness to practise:

- Set standards for “current impairment”
- Investigate fitness to practise scheme
- Apply sanctions on fitness to practise

Obtain appropriate documentation to determine fitness to practise, including health reports

Duty:

Removal of licence to practise if fitness to practise is currently impaired or an automatic barring offence has been committed:

- Determine definition of “current impairment”
- Determine automatic barring offences

Associated power:

Removal licence to practise

Duty:

Permit restoration of licence to practise after removal, where appropriate

Associate power:

Restoring of a licence to practise

Duty:

Appeals on the fitness to practise processes

Regulation of veterinary and animal healthcare businesses: duties and powers

Duty:

Run a licensing scheme for businesses

Associated powers:

Provide licences for veterinary/animal healthcare businesses

Setting and collection of fees for business regulation

Duty:

Determine standards for businesses, including codes of practice

- Human and animal health and animal welfare
- Ensuring that staff are suitably qualified, licensed, and adequately trained
- Good governance, record and data keeping and alignment with professional and legal requirements
- Responsible management and usage of medicines, if applicable
- Safe and appropriate physical working environment, including equipment and facilities
- Ensure policies align with the interest of the consumers, as well as their animals – including having a complaints process

Associated powers:

Set what activities can be conducted by veterinary/animal healthcare businesses

Set standards for activities completed by veterinary/animal healthcare businesses

Duty:

Maintain a list of licensed businesses and locations

- Including details of the licence owner and named responsible person

Associated powers:

Obtain appropriate documentation

Hold information on businesses, licence holder, and named responsible people

Duty:

Monitor compliance with standards, including:

- Inspections:
 - Provide notice, except for exceptional circumstances
 - Provide a receipt on items taken
 - Publish results of inspections
- Investigations

Associated powers:

Inspections:

- Powers of entry
 - Including warranted entry, where required
- Charge for the cost of inspections
- Information gathering
 - Including complaints, clinical outcomes, training etc for monitoring compliance
- Additional powers:
 - Search and seizure
 - Observation
 - Require explanations
 - Information/records access
 - Review compliance
 - Bring people/equipment
 - Survey/test
 - Examine/investigate
 - Direct premises to be undisturbed
 - Take measurements
 - Take photographs/recordings
 - Take samples
 - Take possession of and detain substances or articles found

Investigations:

- Power of entry
- Powers to seize appropriate information

Duty:

Issue sanctions/take action where required, if standards are not met

Associated powers:

Apply sanctions on/take actions for businesses where there is a lack of compliance
Removal of a business licence

Duty:

Ensure the named responsible person is completing their role appropriately

Associate power:

Hold information on who is the named responsible person

Governance duties and powers

Duty:

Run a Board

Associated powers:

Appoint members to the board, with lay parity

Report details of appointment processes

Duty:

Have additional Committees

Associated power:

Appoint members to committees

Duty:

Set out Corporate Strategy

Associate power:

Set fees policy associated with their corporate strategy (alongside a consultation)

Duty:

Clear distinction between regulation and professional leadership

Associate powers:

Conduct regulatory activities (under a new VSA)

Conduct professional leadership activities (under an updated Royal Charter)

Duty:

Accountable to Parliament and Devolved Governments

- Annual reports
- EfraCom
- Provide detail on how policy is being applied
 - Statistics on fitness to practise process
 - Statistics on powers of entry
 - Statistics on sanctions for businesses

Duty:

Oversight from the Privy Council

- Approval of Board appointments

Duty:

Accountable to an oversight body, who will:

- Review performance of the regulator
- Audit the use of powers (including removal of a professional's licence to practise, powers of entry, enforcement visits, and removal of a business' licence)
- Review how rules have been made and/or amended
- Review how the regulator has met and prioritised its objectives
- Review how the regulator has conducted consultations and how these results have influenced final decisions
- Review the appointments process to ensure it is fair and transparent
- Review the fee setting process and decisions, so ensure fairness and transparency
- Review the fitness to practise processes and outcomes
- Audit

Duty:

Have regard to steers from the Defra Secretary of State

Associated power:

Reject the steer, in exceptional circumstances

Duty:

Attendance at 6-monthly check in meetings with Defra Secretary of State, or appropriate delegated minister

