Dear CMA Veterinary Services Market Investigation team,

I am responding to the consultation on the draft Funding Order and RCVS Funding Undertakings.

I support reforms that improve transparency, competition and outcomes for pet owners. My concern is that the proposed funding model appears to materially underestimate what the RCVS is being asked to deliver.

This should not be treated as a Find A Vet website enhancement. The visible website is only the public surface. The real work is the creation of a national regulated veterinary market data platform.

On the documents published, the RCVS will need to collect, ingest, validate, normalise, govern, publish and maintain data from veterinary businesses across the UK. It will also need to make that data available to pet owners and, where relevant, third parties. That requires far more than web design.

At minimum, this requires:

1. a canonical data schema for veterinary businesses, sites, FOPs, OOH centres, mobile providers, ownership, services, prices, medicine and prescription information, complaints, attestations and compliance status;
2. ingestion routes for thousands of veterinary businesses with different systems, different naming conventions, different price structures, different ownership models and different administrative capacity;
3. validation rules, error handling, deduplication, audit trails, version control, change history and correction workflows;
4. data governance controls covering security, privacy, access rights, data quality, third-party access, monitoring and misuse;
5. an API or equivalent structured data distribution layer, with authentication, documentation, rate limits, support, logging, versioning and service management;
6. operational support for practices that cannot submit clean data first time, dispute how data is presented, change ownership, open or close sites, amend prices, change OOH arrangements or report non-compliance.

That is a data transformation and regulatory operations programme. It is not a website project. I would have concerns that the RCVS as an organisation will face significant challenges which it may not understand today in order to digitally transform itself such that a project of this nature has a high chance of success.

The current presentation of the levy risks obscuring that distinction between transformation and a website project. A public search interface can be built relatively cheaply. A reliable national data infrastructure cannot. The challenge is not whether Find A Vet can display more fields. The challenge is whether the RCVS can resource and efficiently operate the underlying data model, ingestion process, quality assurance process, compliance workflow and external access model.

That matters because the consequences of underestimation are serious.

If the costs are underestimated, one of three things is likely to happen:

1. the RCVS has to use reserves or internal resources to absorb the shortfall;
2. the levy has to rise sharply in later periods, after the market has already been told a lower figure;
3. the reforms are delayed, narrowed or implemented through manual workarounds that do not deliver the intended competition and transparency benefits.

None of those outcomes would serve pet owners, veterinary businesses, the RCVS or the CMA.

There is also a governance concern. If the RCVS is not already a digitally transformed organisation with mature data infrastructure, platform delivery capability and API governance, then the risk is not marginal. It goes to the basic deliverability of the remedy.

The CMA should consider whether an underfunded and under-specified delivery model could have the practical effect of delaying or weakening the reforms. That risk should be addressed now, before the Funding Order is finalised.

The CMA should reconsider finalising the levy on the current level of disclosure. Before doing so, it should consider publishing a more granular delivery and cost model, including:

1. the proposed data schema and data model;
2. the proposed ingestion methods;
3. the API or third-party access architecture;
4. the data quality, validation and correction process;
5. the security, privacy and governance model;
6. the supplier scope and internal staffing model;
7. expected practice support volumes;
8. ongoing hosting, maintenance, monitoring and support costs;
9. low, base and high cost scenarios for the first three years;
10. a clear statement of what functionality will and will not exist at launch.

Without that information, stakeholders cannot properly test whether the estimated levy is reasonable, efficient or deliverable.

The risk here is not simply that the number may be wrong. The risk is that the work has been mischaracterised. The funding model appears to price the visible interface, while the real cost sits in data infrastructure, transformation, governance and operations.

I would therefore ask the CMA to revisit the cost estimate and discuss a full delivery model with the RCVS before the Funding Order is made.

Furthermore I would ask the CMA to consider the potential for the delivery of this service to be - at least in part - a joint venture between the RCVS and market entrants like VetsCompared, given that these challenges have been tackled successfully in the private sector since originally being considered.

Yours faithfully,

[redacted]
Founder
VetsCompared & Vetrics