

Response to CMA consultation

- In the price list information, it currently states that a range cannot be posted, what is not clear is whether it can say “From” where appropriate.
- What is considered a reasonable amount in terms of text prior to the price list on websites? This is not clearly defined – is this intentional to allow individual interpretation? If not, needs further explanation.
- How can practices comply with all requirements for parasiticide price list without being in breach of the VMD and VMRs in terms of advertising prescription medicines?
- Bundling requirements are beyond that which can be achieved by PMS – is there any way to caveat this in client communication to avoid being accused of non-compliance?
- Invoice wording regarding written prescriptions seems excessive and repeatable, preferable to have this align with the requirement for e-mail and text reminder e.g. “Written prescriptions are available from our practice, for the initial prescription item we charge £21 with any additional items requested at the same time being £12.50 per item. For more information see RCVS website. All prices are inclusive of VAT.”
- Veterinary nurse definition is not reflective of how RCVS define a nurse, nor is there any mention of “registered veterinary nurses”
- SQP definition lacks accuracy – no mention that they can also prescribe NFA-VPS medicines.
- The posters are ridiculous. The text too large, the size proposed too large. It is my understanding that the CMA found that the majority of pet owners were aware of the availability of written prescriptions and getting medicines online so the severity of the poster seems disproportionate. This isn’t advertised in any other business and we are already required to advise owners and display posters about availability of written prescriptions under RCVS requirements. Can the posters not reflect a more balanced design – advising owners they can get a written prescription and may save, whilst clearly showing the price for both initial and additional items, together with that this is more specifically relating to ongoing medication as it is often against the code of conduct in terms of animal welfare to provide a written prescription for urgent medicines. This is not clear in current posters.
- The poster showing the graph – same feedback as point above as well as querying where this data has come from? Reference needed for the data that was used to create that graph to ensure it remains accurate – if not evidence based, should not be used as false statement and misleading.
- In complaint log – there is no outcome that relates to civil legal claims that aren’t negligence related such as debt and other administrative cases.