

Comments on Draft Substantive Order and related documents

OWNERSHIP INFO

Explanatory note 44 *“The requirement for Ownership Information to be included on storefront signage or appear in online map results does not apply to the locations of Other Relevant Service Providers where Veterinary Services are not supplied 11 directly to Pet Owners (for example, laboratories providing business to business testing services) as Pet Owners will not be visiting these sites. “*

The ownership of the ancillary services SHOULD be made known. One of the purposes of this investigation was to address the monopolies situation that has evolved in the Veterinary care sector. This is important as consumers have left some of these LVG to receive care from independent practices, to then unknowingly be spending their money with the LVG by way of the online pharmacy.

PRACTICE INFO

Article 6 (1) *“(c) ensure that the Practice Information provided in accordance with this Article is updated as soon as reasonably practicable and in any event within one week. “*

In small practices, this may not be possible over 1 week. Limited Admin staff who may be on leave when changes occur. A week is too short a time.

PRICE LIST

Article 7 (3) *“(c) when sending the first of any digital communications to a Pet Owner to confirm a consultation booking, include in that communication: (i) the price the Veterinary Business will charge for the consultation and any pre-booked standard treatments or services”*

To do this, the admin burden on a small, single site practice is far too great. The consultation bookings will be for a range of services, : Nail clips, Anal Glands, Boosters, vacc courses, First consultations, repeat consultations, check ups, so what is currently a semi-automated service will be an individual personalised, lengthy exercise.

If we decide not to send appointment reminders to alleviate this administrative burden, it could increase the number of missed appointments which is bad for our business and the care of the pets whos treatment may be interrupted.

PARASITICIDE PRICE LIST

Article 8 (2) *“Each Veterinary Business required under Article 8(1) to publish or provide the Parasiticide Price List to Pet Owners must: (a) ensure that the list is up to date; and (b) where the Veterinary Business changes the price of any Parasiticide, update the Parasiticide Price List in respect of that product before the revised price is charged to Pet Owners.”*

Unlike services (which may be updated eg annually or quarterly), most practices operate dynamic pricing for medicines including parasiticides. For example we will update our drug prices monthly to reflect the wholesaler price, other clinics may be doing it in realtime so as often as daily. It is therefore completely unrealistic to update website price lists, printed literature, pet health plan savings etc immediately. A more sensible approach would be to give a reasonable timeframe for updates and a disclaimer on all literature and lists to say that lists for drug prices may be out of date by X amount (or “prices correct as of X date) and to direct pet owners to enquire as to current prices.

SUBMISSION OF INFO TO RCVS

This needs to be a system in which an online comparison website can take the information from a practices website, so that the prices are updated in real time when the website pricelist is updated. There are already sites that can do this, im not sure the RCVS has the expertise to do this sort of IT work and why should it when there are already specialist sites out there that can achieve this better.

WRITTEN PRESCRIPTIONS

Article 15 (1) *“(b) prepare a digital copy of the Written Prescription by the end of the second Working Day following the consultation in which the medication is prescribed or, in cases where the request is made outside of a consultation, by the end of the second Working Day following the request”*

We cannot issue a written prescription until the client has ordered the medication on line and has an order number. The VMD advised a couple of years ago that we should not be giving hard copies out and the prescription needs to be only usable for one transaction (hence the order number request) It is then up to the client to get on this as soon as they can. This direction should be that we have 48hrs to produce a written prescription ONCE AN ORDER NUMBER HAS BEEN SUPPLIED BY THE CLIENT

COMPLAINTS

Article 21 (2) *“(c) That an Actionable Complaint must be acknowledged in writing by the Veterinary Business within five Working Days of it becoming an Actionable Complaint. “*

A small practice may only have one person who deals with complaints .. 5 days is unreasonable given that one persons other workload and the fact they may be on Leave.

Schedules 2 and 3:

WRITTEN PRESCRIPTION NOTICE and FLYER FOR ONGOING MEDS

Schedule 2 - written prescription notice: The asterix line "in some cases there may be reasons why written prescription is not available" needs to be bigger.

Schedule 3 - ongoing meds flyer: The asterix line "In some cases, there may be clinical or regulatory reasons why a written prescription is not available"

This literature is **UNFAIR** and **UNREPRESENTATIVE** and has made many in the independent veterinary profession very ANGRY. The wording "SIGNIFICANTLY CHEAPER ONLINE" makes out that as veterinary professionals we are profiteering from the sale of drugs, when the truth is it is a recognized business model to have an income stream from meds sales to help keep clinical prices lower. As an independent practice, I am expected to direct my clients to my corporate competitors who can buy in bulk, have businesses offshore (to avoid VAT) and have other businesses in the veterinary sector that can subsidise the very low margins they achieve from cheap online sales.

These companies exist and are doing well for themselves, why then is the government actively pushing sales to these large corporations at the expense of the small businesses they claim to support?

Awareness that people can buy medicines on-line is already there, we already have signage in our practice to this effect (as required by the Practice Standards Scheme) This poster is unnecessary and serves to erode the trust between us and our clients.

No other industry has this requirement .. I don't go into a high street shop and see a poster saying you can get your shopping cheaper on line/ on Amazon ...that would be ridiculous, but this is what you are asking us to do. Why?