



Veterinary Complaint Reform

Campaign for an Independent veterinary complaints body

Competition and Markets Authority
25 Cabot Square
London
E14 4QZ

20th August 2026

Response to CMA Draft Substantive Order – Vet Services Market Investigation:

Dear CMA,

We are responding to the above with particular regard to pet-owner consumer complaints and redress. Our over-riding concern is that elements of the draft order cannot be fairly made, or implemented in the absence of a fully independent Veterinary Regulator and a fully independent Ombudsman service for this market.

The Final Report stated that the current regulatory framework failed consumers and in itself gave rise to a consumer detriment. The report also detailed why the current dual role of the RCVS, in terms of being both the veterinary membership body and regulator was so problematic; giving rise to a conflict of interest which undermines the regulatory role. In June, the Efra Select Committee recommended an entirely independent and separate regulator, not being the RCVS. To give the RCVS more powers in terms of monitoring and developing a 'decision tree', is inconsistent with the analysis of that body in the FDR, which pointed to the fact that an independent regulator is needed.

We'll comment below on the detail of the proposed compulsory in-house complaints procedure as set out in the draft order, but again re-iterate that an in house complaints procedure cannot be effective and operate fairly for consumers, without the pre-requisites of a fully independent and properly constituted veterinary regulator and consumer orientated Ombudsman. It just won't work or operate fairly for consumers otherwise.

We are also greatly concerned that the in-house complaints procedure appears to have been largely designed by the VDS -the veterinary indemnity insurer, with a vested interest in the outcome of complaints, who represent 95% of veterinary practices. They are therefore inherently biased, with no notion of consumer protection – quite the opposite. In our view the CMA, with its consumer protection responsibilities should be setting out how the in-house complaints process should work and what elements it should contain.

Neither should the 'complaints log' be designed by the VDS – it appears to be an extension of the existing Vetsafe tool. It's apparently also going to be used for regulatory purposes so again it cannot be properly supplied by an indemnity insurer – it's a clear conflict of interest. Complaints logs again should have the fields mandated by the CMA with other consumer body input and be part of software that is regulatory compliant.

We'll comment firstly on the draft substantive order in relation to complaints and then the complaints log:

1.Paragraph 21(g) refers to the pet-owner/complainant being asked to 'provide certain information'. This should be removed. At the very least the information envisaged should be specified and put out again for consultation. It's of course most unusual for complainants to provide information. It's the complainant who is seeking information.

Hence, it should be mandated in the complaints procedure that all clinical information requested by the complainant must be provided within a specified period and this should include the originals of clinical notes, scans, test results and any other information requested in connection with the complaint.

2. 8 weeks is the maximum length of time it should take for any complaint to be dealt with in-house. After that the complainant has the right to take the complaint to an independent Ombudsman. If the complainant does not receive the information they have requested from the practice then they should have the right to terminate the process and take the complaint directly to the Ombudsman.

3. We haven't seen the final version of the 'decision tree' so this cannot be consulted upon. However, we think it's completely unnecessary and pointless. There's nothing at all complex about having an in-house complaints process – standard across all other sectors/markets and an independent Ombudsman. If one were produced, it would not be for the benefit of consumers if it were designed by the vet's membership body – the RCVS. Any 'tree' should not shepherd complainants along any particular route. Moreover it should be made clear that a complaint can at any point be made to the Veterinary Regulator regarding breaches of the Code of Conduct and Practice Standards.

4. Both of these – the Code of Conduct and the Practice Standards Scheme should be linked to in the information provided to pet-owners about any complaints process.

5. In terms of ADR/Mediation we've previously stated that this should be provided independently, again it could be and could be provided via an Ombudsman scheme. It's suggested in the draft order that vet practices should source their own provider and elsewhere in the documents that the RCVS will identify a provider, so there is no clarity at all about which would be the case. In either case however there would be no independence from the organisation complained about.

6. In terms of the 'complaint log -we note that it is to be provided to the RCVS to publish data about complaints. The intention was also that it be used to provide information which would feed into standard setting. In its present format and being designed by the VDS as we have referred to above, it is not fit for purpose.

It needs to be specified to the pet-owner/complainant precisely who this log will be shared with. Are details of the complainant to be shared with other businesses, whether veterinary or otherwise, in any capacity whatsoever?

In terms of it being used to improve standards we are really concerned that in the fields 'nature' and 'sub- nature' of the complaint, only 1 or 2 of the pre-defined boxes can be ticked – there is no reason to limit this and it will give an entirely distorted view of the complaint which may consist of many of the issues defined in the boxes.

Moreover, there is no place for the detail of the clinical procedures complained about to be given – how are lessons supposed to be learnt from the paucity of detail? The 'summary of the complaint' field should not be excluded – which is the proposal – when the complaint log is submitted to Regulator.

There is no box for inadequate treatment options being given – which there needs to be. The box 'unexpected outcome' is meaningless.

There should be a box for 'failure to monitor' when hospitalised – hospitalisation issues should also be a box to tick.

In terms of 'action taken' there is a box to indicate if the pet-owner took civil legal proceedings. There should be a box to indicate where the veterinary practice issued proceedings and/ or instructed debt collectors'.

We note the VDS have specified the legal cause of action as that of 'negligence' we're not clear why this should be specified in an complaints log and also why if it is then a cause of action under the CRA 2015 is not referred to.

There should also be a box under 'further actions' if any remedial work for example further surgery was undertaken.

In summary, if this is a complaint log, intended to provide valuable data, for practices and clinical standards to improve, then it is not fit for that purpose. We feel that it should be designed by the CMA incorporating best practice principles about consumer complaints information for regulators – not by the VDS and not embedded into their existing systems, but be part of regulatory compliant software – which would have things like 'change-logs' mandatory as part of the systems used.

But again, we can only say that the best source of information about complaints, from the perspective of improving standards, to be used by a regulator, would come from an Ombudsman.

Regarding other aspects of the draft Order we welcome that they are enforceable directly by the CMA – in particular the provision that businesses must enable vets to comply with their obligations in the Code of Conduct and supporting guidance. We note that the CMA intends to meet weekly, initially, with the RCVS with regard to their monitoring of the Order. (Again, as we previously urged, regarding treatment options, the 'full range of treatment options available' wording needs to be used.)

We welcome that all potential cases of non-compliance should be reported to the CMA and would also request that information by the CMA is provided as to how the public may report potential non-compliance to the CMA.

Kind regards,

Veterinary Complaint Reform