

Response to the Veterinary Services Market Investigation Draft Substantive Order and RCVS Undertakings

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Executive summary

The final Undertakings should require the RCVS to engage in or provide:

- early market and technical discovery;
- assessment of existing schemas and infrastructure;
- an open technical specification;
- API, bulk and delegated submissions;
- recognition of market-led compliance tools;
- fair and timely third-party data access;

This work has now been provided by the market. We recommend competitive commissioning where existing providers can deliver the required systems. We support the creation of accurate, structured and reusable information about veterinary practices.

However, the current drafting risks encouraging the RCVS to design a new schema, submission portal, public directory and data-sharing infrastructure without first assessing the systems, schemas and operational capabilities that already exist.

A closed or predominantly manual implementation would create unnecessary cost and duplication. More importantly, it could undermine the purpose of the remedies.

Consumers will continue to use search engines, local directories, comparison services and other third-party platforms when choosing a veterinary practice. If official RCVS information is difficult to submit, slow to update or difficult to reuse, unofficial “shadow directories” will fill the gap using incomplete, scraped or commercially supplied data.

Some of those services may present practices according to commercial relationships rather than consumer value. That is precisely the type of outcome the CMA is seeking to avoid within the official data-sharing framework.

The best protection against that risk is not to attempt to make the RCVS the only consumer destination. It is to ensure that accurate official information can flow easily into reputable market-led services.

1. Avoid creating a closed central directory

The RCVS Find a Vet service can provide an authoritative public record and a useful baseline search facility.

However, consumers do not use one national directory as their only route to finding veterinary services. They use local searches, treatment-specific searches, maps, reviews, comparison services and direct booking tools.

A central RCVS platform will not remove those channels.

If the official system is closed, difficult to integrate with or slow to update, the result will be parallel directories built from:

- scraped practice websites;
- incomplete public records;
- commercially submitted information;
- outdated ownership data;
- unverified prices;
- manually maintained listings.

These shadow datasets will be less accurate and less accountable than information supplied through the official process.

They may also create greater scope for practices to receive improved placement, prominence or recommendations through payment rather than consumer-relevant evidence.

The RCVS should therefore treat Find a Vet as reusable public data infrastructure, not as a standalone directory intended to displace existing consumer services.

2. Reduce the incentive for pay-to-play shadow directories

The draft Undertakings place controls on how approved recipients may use Find a Vet information within paid or promoted rankings.

Those controls will be most effective where legitimate comparison services can obtain and reuse official data through a practical, timely and proportionate process.

A restrictive or technically burdensome sharing model would have the opposite effect. It would incentivise services to operate outside the official framework using their own incomplete datasets.

That would leave the RCVS with less oversight and consumers with less confidence about:

- where information originated;
- when it was last updated;
- whether all eligible practices were included;
- whether ranking was influenced by payment;
- whether prices and ownership information were accurate.

Open and usable official data would make it easier for responsible services to compete on the quality of their consumer tools rather than on which businesses pay to supply or promote information.

The objective should be to make compliance with the official data framework easier and more valuable than maintaining an unofficial parallel directory.

3. Conduct market and technical discovery before building

Before fixing its schema, architecture or procurement approach, the RCVS should undertake structured market and technical discovery.

This should include engagement with:

- veterinary practice-management system providers;
- veterinary website providers;
- compliance technology providers;
- consumer comparison platforms;
- veterinary businesses of different sizes;
- organisations already maintaining structured practice, ownership, pricing and service information.

The discovery process should identify existing:

- data schemas and models;
- practice and location identifiers;
- ownership datasets;
- price and service structures;
- validation processes;
- website publishing tools;
- compliance and attestation workflows;
- APIs and bulk-import systems;
- public search and comparison tools;
- monitoring and reporting infrastructure.

The current drafting focuses principally on consultation with veterinary businesses. That is too narrow for a programme whose success will depend on technical integration across the wider veterinary market.

Technology, data and consumer-platform providers should be expressly recognised as relevant stakeholders.

4. Assess existing systems before commissioning a new build

The RCVS should not assume that every part of the required infrastructure must be designed and built from scratch.

Relevant capabilities already exist across veterinary PMS platforms, compliance services, website systems, data providers and consumer platforms.

Before developing or procuring a new system, the RCVS should assess whether existing providers can support:

- collection of practice information;
- data validation;
- structured price publication;
- ownership and service information;
- public practice pages;
- attestations and evidence collection;
- compliance-monitoring workflows;
- third-party APIs;
- bulk submissions;
- regulatory reporting.

The draft Undertakings already contemplate the RCVS developing or commissioning a technical data-sharing solution.

That principle should apply across the broader implementation programme.

Where an existing provider can deliver a component more quickly, reliably or economically, the RCVS should be able to commission that provider through a fair and open process.

The RCVS would retain control over:

- regulatory policy;
- the official specification;
- the official dataset;
- third-party access rules;
- compliance decisions;

- reporting to the CMA;
- overall accountability.

A contracted supplier could operate technical and administrative systems at arm's length without exercising the RCVS's regulatory functions.

5. Publish an open specification early

Veterinary businesses will need to begin implementing the substantive requirements before all RCVS systems are operational.

The RCVS should therefore publish an initial open technical specification at an early stage.

It should include:

- required data fields;
- field definitions;
- mandatory and optional information;
- permitted values;
- practice, business and location identifiers;
- validation rules;
- effective dates;
- update requirements;
- data provenance;
- versioning and change control;
- bulk-submission formats;
- an initial API specification;
- test data;
- a technical sandbox.

Publishing this specification early would allow veterinary businesses and their suppliers to begin meaningful compliance work without waiting for the final RCVS platform.

It would also allow the schema to be tested against real veterinary systems before it becomes fixed.

6. Recognise market-led compliance during the transition

The Order and Undertakings should make clear that veterinary businesses may use existing PMS providers, website providers and specialist compliance services to prepare, publish, maintain and evidence compliance.

Businesses should not be encouraged to delay implementation while waiting for the RCVS platform.

Information prepared in accordance with the published RCVS specification should remain reusable when the central system becomes operational.

A business should not have to repeat work or manually re-enter information because it used an existing market-led solution during the transition period.

The RCVS should also support external validation tools that allow businesses to check whether their information is complete and correctly structured before submission.

This would:

- encourage earlier compliance;
- reduce pressure on veterinary businesses;
- reduce support demands on the RCVS;
- improve data quality at launch;
- avoid temporary manual processes;
- reduce duplicated work.

7. Make web entry a fallback

The current drafting risks placing an RCVS web form at the centre of the submission process, with integrated methods treated as alternatives.

Manual web entry should be a fallback for businesses that do not have an integrated system. It should not be the default technical architecture.

The final Undertakings should require support for:

- direct API submission;
- scheduled system-to-system synchronisation;
- structured bulk upload;
- delegated submission by authorised providers;
- multi-practice and multi-location submissions;
- updates to individual fields;
- machine-readable validation and error messages.

For many information fields, the authoritative source will already be the veterinary business's operational system.

Direct integration will improve accuracy and reduce discrepancies between the practice's PMS, website, consumer communications and RCVS record.

8. Ensure fair access where delivery is outsourced

External delivery should be supported by proportionate contractual and technical safeguards.

These should include:

- RCVS control of the official dataset;
- equal release times for approved recipients;
- consistent service levels;
- role-based access controls;
- audit logs;
- restrictions on confidential and non-public information;
- operational separation from unrelated commercial services;
- independent security assurance;
- RCVS control over access and regulatory decisions;
- appropriate termination and transition arrangements.

These protections can preserve confidence in the official system without unnecessarily excluding capable market participants from supplying or operating the underlying infrastructure.

Requested amendments

We recommend that the final Undertakings:

1. Require structured market and technical discovery before the RCVS fixes its schema, architecture or procurement approach.
2. Require engagement with technology, data, compliance and consumer-platform providers as well as veterinary businesses.
3. Require the RCVS to assess existing schemas, systems and operational capabilities before developing new infrastructure.
4. Require early publication of an open, versioned technical specification, validation rules, API documentation, test data and a sandbox.
5. Expressly recognise market-led compliance systems during the period before the central RCVS infrastructure becomes operational.
6. Require information prepared against the official specification to remain reusable without material manual re-entry.
7. Require API, bulk, delegated and system-to-system submissions, with manual web entry retained as a fallback.
8. Permit competitive commissioning of technical and administrative delivery while the RCVS retains regulatory control and accountability.
9. Require fair-access, confidentiality, security and governance safeguards where delivery is outsourced.
10. Require the RCVS to treat Find a Vet information as reusable public data infrastructure capable of supporting reputable independent consumer services.

Conclusion

The remedies will not eliminate third-party veterinary directories and comparison services.

If official information is difficult to submit or reuse, fragmented shadow directories will continue to emerge using less complete and less reliable datasets. This would increase, rather than reduce, the risk of consumers encountering commercially influenced listings and rankings.

The more effective approach is to make accurate official data widely usable through an open, governed and interoperable framework.

By building on existing market capabilities, publishing its specification early and supporting integrated delivery, the RCVS can reduce implementation costs, accelerate compliance and encourage reputable consumer services to operate within the official data ecosystem rather than outside it.