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Response to the CMA Consultation on the Draft Veterinary Services Market Investigation Order 2026 and Draft Undertakings

Implementation, monitoring, data access and regulatory governance

Submitted by
International Veterinary Governance Observatory (IVETGO.org)

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Executive summary

IVETGO.org welcomes the Competition and Markets Authority's decision to introduce enforceable measures addressing persistent weaknesses in the United Kingdom veterinary services market. The package has the potential to improve price transparency, ownership disclosure, access to written prescriptions, treatment estimates, itemised billing, protection of independent clinical judgement, complaints handling and access to mediation.

This response does not seek to reopen the CMA's findings or the remedy choices made in its final report. It is directed to the consultation questions: whether the draft Veterinary Services Market Investigation Order 2026 and draft RCVS Undertakings are consistent with the final report, and whether the instruments are drafted so as to achieve their intended results.[1]

IVETGO.org has identified two issues that are, in our view, direct and material inconsistencies between the final decision and the implementation instruments.

1

Restore routine and random monitoring

The final report envisages random spot-checking, carefully designed sampling and routine monitoring. The draft Undertakings confine spot checks to cases selected because a risk assessment already indicates possible non-compliance, while the RCVS proposal states that monitoring will be reactive only. This would remove the independent baseline needed to detect silent, widespread or low-complaint non-compliance.

2

Correct the third-party data restriction

The final report sought to prevent applications showing paid-for or promoted rankings. Draft Undertaking 4.7(b) could instead be read as prohibiting any paid ranking service or application, including a neutral subscription-funded comparison tool. The clause should target payment that influences ranking, not the funding model of the comparison service.

We also recommend targeted changes to improve the operation and credibility of the regime:

- a defined service standard for updating Find a Vet data, together with effective dates, source timestamps and a visible correction mechanism;
- a monitoring plan combining random, stratified and risk-based checks, with minimum annual sample sizes and explicit inclusion of single-site businesses;
- clear escalation rules and maximum remediation periods, so that cooperation does not become indefinite informal forbearance;
- functional separation within the RCVS between professional regulation, business-compliance monitoring, data-access decisions, ADR oversight and professional representative functions;
- mandatory participation of pet owners, consumer organisations, accessibility users and independent data users in design and testing;
- a remedy-linked complaints taxonomy and an annual sample of complaint processes and logs sufficient to assess each obligation;
- publication of an implementation dashboard before the first 24-month complaints insights report; and
- a structured legal-entity identifier alongside the consumer-facing ownership or group name, without displacing the final report's decision to show an identity consumers can recognise.

The remedies will only generate durable competition and consumer benefits if compliance can be measured independently, the central information platform can be trusted, and external comparison

tools are able to operate on neutral terms. A regime based predominantly on complaints and self-reporting would risk measuring only the visibility of non-compliance rather than its true prevalence.

Summary of proposed amendments

Provision	Recommended change
Draft Undertakings 3.5	Require random, stratified routine checks in addition to risk-based checks.
Draft Undertakings 3.7	Set an annual minimum sample for complaint-process and complaint-log review, including single-site businesses.
Draft Undertakings 3.8-3.10	Record all suspected and confirmed breaches; require immediate escalation of serious or repeated cases; define remediation periods.
Draft Undertakings 4.4	Introduce an update service standard, effective dates, timestamps and correction procedures.
Draft Undertakings 4.5 and 4.8	Require consumer, accessibility and independent data-user testing and consultation.
Draft Undertakings 4.7(b)	Prohibit payment-influenced ranking, not neutral paid services or applications.
Draft Undertakings 4.7(c)	Require written reasons and time limits for data-access decisions and appeals.
Draft Undertakings 7	Map complaints data to each remedy and strengthen transparency around mediation and outcomes.
New governance schedule	Require functional separation, conflict controls, independent audit and public performance reporting.

1. About IVETGO.org and scope of this response

1.1 About IVETGO.org

The International Veterinary Governance Observatory (IVETGO.org) is an independent public-interest initiative examining how veterinary services are governed, regulated and made accountable across jurisdictions. Its work is animal-centred and consumer-facing. It considers not only professional regulation, but also market structure, ownership transparency, access to services, complaints and redress, the position of animals as patients, and the interaction between veterinary businesses, regulators and the public.

IVETGO.org's comparative framework is intended to make regulatory arrangements understandable and testable. It assesses whether legal and institutional structures produce transparent, proportionate and enforceable outcomes, and whether they protect animals and clients without creating avoidable monopolies, information barriers or conflicts of interest.

1.2 Scope

The CMA has asked for views on the drafting of the Order and Undertakings, including whether the provisions reflect the final decision and whether they will achieve the intended remedy outcomes. The CMA has also stated that it is not reopening its findings or its choice of remedies.[1] IVETGO.org has therefore concentrated on implementation, legal effect, monitoring, data integrity and governance.

Our comments are organised around the provisions most likely to determine whether the regime works in practice. We support the overall direction of the remedies and do not repeat the extensive evidence already assembled by the CMA concerning concentration, weak price competition, information asymmetry, medicine purchasing, referrals and consumer decision-making.

1.3 Principles applied

- Consistency: the legal instruments should implement, not narrow or unintentionally alter, the final decision.
- Measurability: compliance must be capable of being assessed independently of complaint volumes and self-reporting.
- Data integrity: information used by consumers and third parties must be current, attributable and auditable.
- Neutral access: comparison services should not be excluded because of their funding model where payment does not influence ranking.
- Functional independence: monitoring, data gatekeeping, dispute resolution and professional representation should not be allowed to blur into one another.
- Consumer and animal-centred design: those who use veterinary services must be represented in the design and evaluation of the regime.

1.4 Principal conclusion

The proposed package is capable of producing substantial benefits, but the monitoring design presently described is too dependent on reports, complaints and indicators of known risk. That is not equivalent to the random and routine monitoring contemplated by the final report. Without a representative baseline, neither the RCVS nor the CMA will be able to determine whether apparent compliance reflects actual compliance or merely the absence of detectable complaints.

2. Routine and random monitoring: a material drafting inconsistency

2.1 What the final report contemplated

The final report treats independent monitoring as a central part of the remedy package. It states that the RCVS would need to undertake random spot-checking in addition to processing attestations and reports of possible breaches. It further describes "carefully designed spot-checking of a sample of businesses" as necessary to provide reasonable assurance that veterinary businesses are complying.[2]

> The final report envisages random spot-checking and carefully designed sampling, not only checks triggered by a prior indication of risk.
> CMA Final Decision Report, Part B, monitoring discussion

The final report's cost assessment also refers to the routine monitoring of compliance. These references are important. Random or routine sampling serves a different evidential purpose from risk-based investigation. Risk-based checks are efficient for resolving known concerns; representative sampling is needed to estimate the prevalence and pattern of concerns that have not been reported.

2.2 What the draft Undertakings and RCVS proposal provide

Draft Undertaking 3.5 requires spot checks of a sample of cases where the RCVS's risk assessment indicates a risk of non-compliance. The RCVS monitoring proposal goes further and states that there will only be reactive monitoring in response to information received and no routine monitoring of practices.[4][5]

This is not simply a difference in operational detail. It changes the evidence base of the scheme. A risk-triggered sample is drawn from businesses already suspected of difficulty. It cannot establish the compliance rate of the wider market, identify non-compliance that generates few complaints, or demonstrate that the remedy is operating consistently across ownership models and regions.

2.3 Why reactive-only monitoring is insufficient

- Complaint volumes are affected by consumer awareness, confidence, time, language, vulnerability and the perceived value of complaining. They are not a reliable denominator for compliance.
- Many obligations concern website wording, price presentation, ownership disclosure and prescription information. Consumers may not know that information is missing or legally defective.
- Single-site practices do not fall within the attestation duty applicable to businesses operating more than one first-opinion practice or out-of-hours centre. Without routine sampling, this part of the market may be checked only when someone reports it.
- Corporate groups may have centralised systems capable of generating apparent formal compliance across many sites. Sampling must test both group policies and local implementation.
- A regulator cannot evaluate trends, geographic differences or ownership effects if its sample is selected solely because non-compliance is already suspected.
- A reactive model may create a perverse incentive: businesses least visible to consumers or least likely to attract complaints are least likely to be examined.

2.4 Proposed approach

IVETGO.org recommends a dual monitoring model:

1. A random, stratified routine programme designed to provide a credible baseline of compliance across the market.
2. Additional risk-based checks triggered by complaints, reports, anomalies, previous non-compliance or other intelligence.

The routine sample should be stratified at minimum by business size, single-site or group status, common ownership group, UK nation and region, first-opinion or out-of-hours function, and material business model. The RCVS should publish the methodology and report the achieved sample without disclosing information that would compromise active investigations.

Digital compliance checks should ordinarily be capable of being undertaken without notice. The requirement for reasonable notice should be confined to physical access or requests that genuinely require operational preparation. Advance notice of a website check would reduce its evidential value.

1 **Amend Undertaking 3.5**

Require the RCVS to operate both a random, stratified routine monitoring programme and additional risk-based checks. The annual monitoring plan, sampling framework and principal results should be supplied to the CMA and published in an accessible form.

2 **Include all business types**

The routine sample should expressly include single-site businesses, small groups, large groups, out-of-hours providers and different ownership structures. The attestation threshold must not become an unintended boundary around effective oversight.

3 **Permit unannounced digital checks**

Reasonable notice should be required for physical inspections where necessary, but not for remote checks of websites, displayed prices, digital information, Find a Vet records or other publicly available material.

Provision: Draft Undertaking 3.5

Current effect: Spot checks are directed to a sample of cases where a risk assessment already indicates a risk of non-compliance.

Proposed wording: “The RCVS shall operate: (a) a random and stratified programme of routine compliance checks sufficient to provide a reliable baseline of compliance across Relevant Veterinary Businesses; and (b) additional risk-based checks where information indicates a risk of non-compliance. The programme shall include single-site and multi-site businesses and shall be documented in an annual monitoring plan.”

Reason: This restores the random and routine monitoring contemplated by the final report while retaining proportionate risk-based investigation.

3. Access to Find a Vet data and neutral comparison services

3.1 The purpose of third-party access

The final report recognised that Find a Vet data could support an ecosystem of comparison tools, innovation and alternative services. Third-party access is therefore not ancillary. It is one of the mechanisms through which standardised information may become useful to consumers in different formats and settings.[2]

The final report states that access criteria should prevent use of the data in applications showing paid-for or promoted rankings. Read naturally, that targets rankings whose order or prominence has been purchased or promoted by the veterinary business.

3.2 The draft wording may be materially broader

Draft Undertaking 4.7(b) requires a condition that no approved third party use the data "for any paid or promoted ranking process, service or application".[4] The placement of "paid or promoted" before the series "process, service or application" creates a real risk that the restriction will be read as applying to a paid service or application even where the ranking itself is neutral.

That could exclude a consumer subscription service, a professional research platform, a fee-funded comparison application or another sustainable service whose rankings are not affected by payments from veterinary businesses. Such an outcome would narrow the final decision and weaken the competitive and innovative use of the dataset.

3.3 The correct regulatory target

The relevant harm is not that a comparison service receives revenue. The harm is that a veterinary business can pay to alter its position, prominence, labelling or treatment within a ranking while the output appears to be independent. The condition should therefore regulate influence over ranking, not the business model of the data user.

The provision should also cover indirect consideration, including sponsorship through connected entities, paid prominence outside the principal list, preferential default settings and commercial arrangements that influence the methodology.

4 **Replace Undertaking 4.7(b)**

Prohibit any ranking in which the position, prominence, labelling or treatment of a veterinary business is influenced directly or indirectly by payment, sponsorship, promotion or other consideration from or on behalf of that business. Expressly permit subscriptions, grants, donations and general advertising revenue where these do not influence ranking.

5 **Make access decisions transparent**

Require published criteria, written reasons, a decision deadline and a clear route of appeal to the CMA. The RCVS should publish a register of approved services, refusals and appeal outcomes, subject to appropriate confidentiality protections.

6 **Apply proportionate safeguards**

Data-security and consumer-protection conditions should be proportionate to the risk and should not favour established commercial operators over public-interest, academic, cooperative or start-up services.

Provision: Draft Undertaking 4.7(b)

Current effect: The wording may prohibit any paid ranking service or application, not merely paid-for placement within a ranking.

Proposed wording: "No Approved Third Party may display or use a ranking in which the position, prominence, labelling or treatment of a Relevant Veterinary Business is influenced, directly or indirectly, by payment, sponsorship, promotion or other consideration provided by or on behalf of that business. This does not prohibit charging users, subscriptions, grants, donations or general advertising revenue where these do not influence the ranking."

Reason: The proposed wording implements the final report's concern about paid-for or promoted rankings without excluding neutral and sustainable comparison services.

Provision: Draft Undertaking 4.7(c)

Current effect: Appeals are contemplated, but the drafting does not establish complete decision standards or time limits.

Proposed wording: "The RCVS shall determine a complete application within 30 working days, provide written reasons for any refusal or condition, and inform the applicant of the right and procedure to appeal to the CMA. The RCVS shall maintain a public register of decisions and appeal outcomes, subject to lawful confidentiality."

Reason: Predictable and reviewable decisions reduce gatekeeping risk and support entry by independent comparison services.

4. Accuracy, timeliness and auditability of Find a Vet data

4.1 The central platform must be trusted

The remedies place considerable weight on Find a Vet as a central source of ownership, service and price information. A consumer may reasonably assume that information displayed on an official regulatory platform is current. Data lag therefore creates a risk greater than an ordinary website error: it can undermine confidence in the remedy itself.

4.2 The draft permits a period of inconsistency

Under Article 10 of the draft Order, a veterinary business must notify the RCVS before charging a revised price. Draft Undertaking 4.4 then requires the RCVS to update Find a Vet as soon as reasonably practicable after receipt.[3][4] No maximum period is specified. A business may therefore begin charging the new amount while the central platform still shows the previous price.

The issue is not that every price can be guaranteed indefinitely. It is that the scheme needs a transparent mechanism for when the effective price, the submitted price and the displayed price are temporarily different.

4.3 Minimum data-integrity features

- an "effective from" date for each price and material service record;
- a visible "last verified" or "last updated" timestamp;
- identification of the source of the update, without exposing personal data;
- a maximum standard update period, proposed as one working day for validated electronic submissions;
- a visible pending-update marker where a notified change has not yet been published;
- bulk upload and application programming interface arrangements for businesses with large numbers of sites;
- automated validation for missing fields, implausible values and inconsistent units;
- a simple public mechanism to report suspected inaccuracies;

- a correction audit trail and performance reporting on update delays and errors.

4.4 Comparability and context

Price transparency is only useful where the service being compared is sufficiently standardised and described. The RCVS should publish a data dictionary defining each service, whether the price is a fixed amount or range, what is included, whether VAT is included where applicable, and any clinically relevant limitations. Businesses should not be able to create apparently low headline prices by excluding elements that consumers would ordinarily understand to form part of the service.

Where a standard item cannot be quoted as a single amount, the platform should display the basis of the range and the factors most likely to alter the final charge. This need not become clinical advice; it is a matter of honest comparison.

Introduce an update service standard

7 Require validated updates to be published within one working day, or within another defined period agreed by the CMA. Report average, median and maximum update times.

Display provenance and timing

8 Show effective dates, last-updated timestamps and pending-update status. Preserve an internal audit trail of submissions and corrections.

Publish a data dictionary

9 Define every mandatory field, service and price basis so that businesses supply comparable information and third parties can interpret it consistently.

Provision: Draft Undertaking 4.4

Current effect: The RCVS must update information as soon as reasonably practicable, without a measurable service standard or required timestamps.

Proposed wording: “The RCVS shall publish a complete and validated update no later than the end of the next working day after receipt. Find a Vet shall display the date from which the information is effective, the date last updated and, where applicable, that a notified update is pending. The RCVS shall report update-time performance to the CMA annually.”

Reason: The change makes the central data source reliable and allows the CMA to assess whether operational delays are impairing the remedy.

5. Monitoring methodology, attestation and escalation

5.1 Attestation is useful but not evidence of universal compliance

Article 24 requires businesses operating more than one first-opinion practice or out-of-hours centre to attest compliance with specified parts of the Order.[3] Attestation can focus senior management attention and create an accountable record. It should not, however, be treated as a substitute for verification.

The threshold also creates a coverage gap. Single-site businesses remain subject to the substantive obligations but not to the same attestation requirement. Routine sample checks are therefore particularly important for this group.

5.2 Annual monitoring plan

The RCVS should prepare an annual monitoring plan approved by the CMA. It should state the population of relevant businesses, the sampling frame, the number and type of checks, the balance between random and risk-based work, the treatment of business groups and individual sites, and the method used to classify outcomes.

The plan need not disclose information that would enable businesses to evade checks. It should nevertheless contain enough information to demonstrate that the programme is capable of producing a meaningful assessment rather than a collection of individual case resolutions.

5.3 Complaint-process and log sampling

The final report contemplated review of an annual sample of complaint processes and logs, giving an example of 50 first-opinion practices. Draft Undertaking 3.7 requires the RCVS to request complaint processes and logs from a sample but does not specify a minimum size or frequency.[2][4] A non-quantified duty may be fulfilled by a sample too small or too uneven to evaluate the remedy.

IVETGO.org recommends an annual minimum of 50 first-opinion and out-of-hours locations, or a statistically justified alternative agreed with the CMA, stratified by size, ownership, geography and previous compliance history. Group-level policies should be tested against site-level records.

5.4 Remediation and escalation

The RCVS monitoring flowchart contemplates discussion, assistance, a business-proposed deadline and possible extensions. Cooperative correction is appropriate for minor or technical breaches, particularly during implementation. It must not become an open-ended process in which serious or repeated failures remain outside formal CMA enforcement.[6]

Every suspected breach should be recorded even if corrected quickly. Otherwise, remediation may erase the evidence needed to identify repeated or systemic failure. The RCVS should distinguish:

- technical or isolated non-compliance corrected within a short standard period;
- material non-compliance affecting consumer decisions or financial outcomes;
- deliberate, concealed, repeated or group-wide non-compliance;
- failure to cooperate, supply records or meet an agreed deadline.

Serious, deliberate, repeated or consumer-harming cases should be referred to the CMA immediately. Minor documentary or digital breaches could ordinarily be corrected within ten working days. No more than one extension should be granted without CMA agreement, and every extension should be reasoned and recorded.

5.5 Public performance information

The RCVS should provide the CMA with complete case-level information and publish an aggregate implementation dashboard. This should not identify a business merely because an untested allegation has been made. It should, however, show the number of checks, suspected breaches, confirmed breaches, corrections, extensions, referrals and enforcement outcomes by remedy and business category.

The first public complaints insights report is scheduled after 24 months, consistent with the final report. IVETGO.org does not suggest changing that decision through these Undertakings. A shorter implementation dashboard would serve a different purpose: it would report whether the machinery of the Order is operating, without purporting to draw mature conclusions about complaint trends.

10 **Set a minimum annual sample**

Amend Undertaking 3.7 to require review of at least 50 first-opinion and out-of-hours locations annually, or a statistically justified alternative approved by the CMA.

11 **Define remediation periods**

Provide standard correction periods, limited extensions and automatic escalation for missed deadlines. Serious, repeated, deliberate or consumer-harming breaches should be referred immediately.

12 **Publish an implementation dashboard**

Report monitoring activity and outcomes by remedy, business size and ownership model before the 24-month complaints insights report, while protecting untested allegations and personal data.

Provision: Draft Undertaking 3.7

Current effect: The RCVS must request complaint processes and logs from a sample, but frequency and minimum coverage are not defined.

Proposed wording: "At least annually, the RCVS shall examine the complaint processes and complaint logs of no fewer than 50 First Opinion Practices and Out-of-Hours Centres, or such statistically justified alternative sample as the CMA approves. The sample shall include single-site and multi-site businesses and shall be stratified by size, ownership and geography."

Reason: A defined baseline reflects the final report and prevents the obligation from being discharged through an immaterial sample.

Provision: Draft Undertakings 3.8-3.10

Current effect: Potential non-compliance may be handled through informal remediation without complete time limits or a clear requirement to preserve breach history.

Proposed wording: "The RCVS shall record every suspected and confirmed instance of non-compliance, including corrective action and previous related incidents. Serious, deliberate, repeated or materially consumer-harming non-compliance shall be referred to the CMA without delay. Other breaches shall ordinarily be corrected within 10 working days. No more than one extension may be granted without CMA approval, and reasons shall be recorded."

Reason: The amendment preserves proportionate correction while ensuring that serious or repeated non-compliance cannot remain indefinitely within informal support.

6. Governance, functional separation and accountability

6.1 Concentration of functions

Under the draft framework, the RCVS would monitor business compliance, receive attestations, operate and develop Find a Vet, approve third-party access, support remediation, commission or contract for mediation, receive complaint information and publish complaint analysis. These functions sit alongside its existing professional regulatory responsibilities and its institutional relationship with the veterinary profession.

The CMA's final report separately recognises the importance of separating regulatory and professional leadership functions to prevent actual or perceived conflicts. It states that if the system were designed anew the regulator would be separate, and that where functions remain within one body, operational principles and governance safeguards must be embedded.[2]

6.2 Risks requiring explicit controls

- The same institution may support a business to remedy non-compliance and then determine what information is escalated to the CMA.
- The RCVS will act as gatekeeper to a public dataset that may support services evaluating veterinary businesses.
- The body commissioning ADR will also receive and analyse complaint data, creating a need for clear independence and data-governance rules.
- Professional conduct regulation and business-compliance monitoring have different subjects, standards, evidence and public-interest objectives.
- Perceived alignment with the profession could reduce consumer trust unless lay participation and transparent accountability are visible.

6.3 Required governance framework

IVETGO.org recommends a governance schedule or protocol approved by the CMA before commencement. It should provide for:

- operational separation of professional conduct, veterinary business monitoring, Find a Vet data-access decisions, ADR oversight and professional representative functions;
- separate decision-makers and reporting lines where a material conflict may arise;
- a published conflicts register and recusal procedure;
- substantial lay and consumer representation, including in oversight of the Find a Vet and complaints functions;
- written reasons and review rights for material decisions;
- annual independent audit of compliance-monitoring and data-access performance;
- direct access by the CMA to underlying monitoring records, rather than reliance solely on RCVS summaries;
- publication of governance arrangements, service standards and performance measures.

These safeguards are not a criticism of individual office-holders. They are institutional controls appropriate whenever one body is assigned multiple functions that may pull in different directions.

13 **Add a governance and separation schedule**

Require the RCVS to document and maintain functional separation between professional regulation, business monitoring, data access, ADR oversight and representative activity, with conflict rules, lay oversight and independent audit.

14 **Give the CMA direct assurance**

The CMA should have access to case-level records and audit evidence and should not depend exclusively on aggregate reports prepared by the monitored body.

Provision: New governance provision

Current effect: The draft Undertakings allocate multiple regulatory, data and dispute-resolution roles to the RCVS without a detailed functional-separation schedule.

Proposed wording: "Before commencement, the RCVS shall submit for CMA approval and publish a governance protocol providing operational separation, conflict controls, lay oversight, written decision standards and independent audit for its functions under these Undertakings. The CMA shall have direct access to underlying records necessary to verify performance."

Reason: A structural protocol supports public confidence and reflects the final report's concern about actual and perceived conflicts between regulatory and professional leadership functions.

7. Consumer participation, accessibility and user testing

7.1 Consultation should not be discretionary only

Draft Undertaking 4.5 requires user testing of Find a Vet and refers to consultation with relevant veterinary businesses as the RCVS considers appropriate. Similar discretionary language appears in relation to data-sharing criteria and the complaints decision tree.[4] Veterinary-business input is important, but the central users of these systems are pet owners and members of the public.

A platform can be technically complete and still fail consumers because information is difficult to find, terminology is unfamiliar, price definitions are unclear, ownership links are not understood, or accessibility requirements have not been met.

7.2 Required user groups

- pet owners with recent experience of first-opinion, referral and out-of-hours services;
- consumers managing long-term or high-cost treatment;
- disabled users and people using assistive technology;
- older users and people with limited digital confidence;
- people whose first language is not English;
- consumer organisations and animal-welfare organisations;
- independent comparison-service developers, researchers and data users;
- small independent practices as well as large groups.

7.3 What should be tested

- whether consumers can identify common ownership and distinguish group identity from local branding;
- whether prices are understood as fixed prices, ranges, estimates or starting prices;
- whether users can compare practices without mistaking paid advertising for neutral results;
- whether prescription and medicine-purchasing rights are prominent and understandable;
- whether complaint and mediation routes can be found and completed;
- whether the service meets recognised accessibility standards;
- whether data can be exported and used accurately by approved third parties.

The RCVS should publish a summary of methodology, participant characteristics, principal findings and changes made. Publication need not disclose personal data or commercially sensitive technical information.

Mandate consumer and accessibility testing

15 Amend Undertaking 4.5 so that pet owners, consumer organisations, disabled users and people with limited digital confidence are mandatory participant groups rather than optional consultees.

Include independent data users

16 Consult approved and prospective third-party services, researchers and public-interest data users on data definitions, formats, licensing and application processes.

Publish testing outcomes

17 Require a public summary of testing methodology, findings and material design changes.

Provision: Draft Undertakings 4.5, 4.8 and 7.4

Current effect: Consultation with users and relevant stakeholders is largely left to RCVS discretion, with veterinary businesses expressly identified but consumers not always required.

Proposed wording: "The RCVS shall undertake and document testing and consultation with pet owners, consumer organisations, accessibility users, Relevant Veterinary Businesses of different sizes and ownership models, and current or prospective independent data users. It shall publish a summary of the methodology, principal findings and changes made."

Reason: The remedies are consumer-facing and data-dependent. Mandatory participation reduces the risk that implementation reflects provider assumptions rather than user experience.

8. Complaints data, mediation and assessment of outcomes

8.1 Complaints are both a remedy and a monitoring source

The draft Order requires relevant businesses to operate complaint processes, maintain complaint logs and participate in free mediation in prescribed circumstances.[3] Complaint data will also inform monitoring and the RCVS's later public insights report. The quality and structure of the data therefore matter beyond the resolution of individual disputes.

8.2 Map complaint categories to the substantive remedies

Schedule 4 should enable each complaint to be coded against the relevant obligation or obligations. At minimum, the data structure should separately identify concerns relating to:

- ownership disclosure and common ownership information;
- Find a Vet or website information and price accuracy;
- written estimates, estimate updates and itemised bills;
- professional independence, commercial pressure and referral information;
- written prescriptions, prescription fees and medicine-purchasing information;
- out-of-hours information and contractual arrangements;
- cremation choices and prices;
- complaint-process accessibility, timeliness and outcome;
- mediation eligibility, participation and implementation of agreed outcomes.

A complaint may concern more than one obligation and should permit multiple codes. A single broad category would obscure whether a particular remedy is generating recurrent difficulty.

8.3 Minimum analytical fields

- date received, acknowledged, substantively answered, closed and referred to mediation;
- site, responsible legal entity and common ownership group;
- remedy or issue codes, with multiple selection;
- whether the complaint was upheld, partly upheld, not upheld, withdrawn or unresolved;
- financial value where relevant and capable of being recorded proportionately;
- corrective action, refund, apology, policy change or other outcome;
- whether a similar complaint or breach had occurred previously;
- whether the matter was reported to the RCVS or CMA and why.

8.4 Mediation independence and transparency

The ADR provider should be operationally independent of both the veterinary business and the RCVS's professional representative functions. The contracting arrangement should protect case confidentiality while allowing aggregate information to reveal systemic issues. Service standards should include eligibility decisions, time to first contact, time to outcome, user satisfaction and implementation of agreed settlements.

Public reporting should distinguish allegations, complaints upheld by a business, mediated outcomes and formal regulatory findings. These are different evidential categories and should not be merged.

8.5 Interim reporting

The 24-month timing of the first complaints insights report reflects the final decision and allows a meaningful body of data to accumulate. IVETGO.org nevertheless recommends earlier publication of operational measures such as the number of businesses with compliant processes, number of logs sampled, number of mediation referrals and average case times. This would test implementation without drawing premature conclusions about market-wide complaint patterns.

Use a remedy-linked complaints taxonomy

18 Ensure Schedule 4 and associated guidance map complaints to every substantive obligation and permit multiple issue codes.

Separate evidential categories

19 Reports should distinguish allegations, business findings, mediated outcomes, RCVS compliance findings and CMA enforcement decisions.

Publish ADR service measures

20 Report eligibility, participation, completion, timeliness, user experience and implementation of agreed outcomes in aggregate form.

Provision: Schedule 4 and Undertaking 7

Current effect: Complaints information risks being too broad to show which individual remedies are succeeding or failing.

Proposed wording: "The prescribed complaint-log format shall contain remedy-linked issue codes, permit multiple codes for a single complaint, and record key dates, outcome, corrective action, mediation status, responsible site and common ownership group. The RCVS shall publish a data dictionary and distinguish allegations from verified findings in all reporting."

Reason: Structured and differentiated data is necessary to evaluate the effectiveness of each remedy and avoid misleading complaint statistics.

9. Ownership information and accountable legal identity

9.1 Support for recognisable group disclosure

IVETGO.org supports the final report's decision that consumers should be shown the principal entity or trading identity through which common ownership can be recognised. A remote holding-company name may be legally accurate but practically meaningless to a consumer. The consumer-facing record should therefore continue to show the recognisable group or network identity selected by the final report.[2][3]

9.2 Add a structured legal identifier

Recognition and accountability are complementary. Alongside the consumer-facing group identity, the underlying structured record should identify the legal person responsible for the relevant practice and, where applicable, its Companies House or partnership registration number. This would allow the RCVS, the CMA, consumers and approved third parties to distinguish similarly named entities and track changes in ownership or responsibility.

This proposal does not seek to replace the final decision with a full beneficial-ownership register through the present Order. Wider beneficial-ownership disclosure may be a matter for future statutory veterinary reform. The narrower recommendation here is a reliable identifier for the legal entity already responsible for compliance.

9.3 Record the nature and date of the relationship

Where ownership information is based on ownership, control or significant influence, the structured data should identify the relevant category and the date from which it applies. A "last verified" date should also be visible. These fields will improve auditability without burdening the consumer-facing display.

21 **Retain the recognisable consumer-facing identity**

Do not substitute obscure holding-company names for the principal group or network identity consumers are expected to recognise.

22 **Add the responsible legal entity and identifier**

Include the legal entity responsible for the site and its registration number where applicable as structured data available through Find a Vet and approved third-party access.

23 **Record relationship and verification dates**

Identify whether the relationship is ownership, control or significant influence, together with effective and last-verified dates.

Provision: Article 5 / Find a Vet data specification

Current effect: The consumer-facing ownership information may identify the principal entity or trading name, but the structured record need not provide a unique legal identifier.

Proposed wording: "In addition to the consumer-facing Main Entity or trading name, the structured Find a Vet record shall state the legal person responsible for the Relevant Veterinary Business, its company or partnership registration number where applicable, the category of ownership, control or significant influence, the effective date and the date last verified."

Reason: The amendment preserves recognisable disclosure while enabling reliable identification, audit and use by approved third parties.

10. Consolidated recommendations

1 **Monitoring baseline**
Restore the random and routine monitoring contemplated by the final report, alongside risk-based checks.

2 **Sampling framework**
Publish an annual stratified monitoring plan covering business size, ownership model, geography, first-opinion and out-of-hours services, including single-site businesses.

3 **Digital checks**
Allow unannounced remote checks of public websites, prices and information; require notice only where physical or operational access makes it necessary.

4 **Complaint-log sample**
Set an annual minimum sample of 50 locations or a statistically justified alternative approved by the CMA.

5 **Breach history**
Record all suspected and confirmed non-compliance, including incidents corrected informally, so repeated failure can be identified.

6 **Escalation**
Refer serious, deliberate, repeated or materially consumer-harming breaches immediately and define standard correction periods for other failures.

7 **Third-party rankings**
Amend Undertaking 4.7(b) so that it prohibits payment influencing ranking, not neutral paid services or applications.

8 **Access decisions**
Require published criteria, written reasons, decision deadlines, a public register and effective appeals to the CMA.

9	Find a Vet updates	Set an update service standard and display effective dates, timestamps and pending-update status.
10	Data dictionary	Publish clear definitions and validation rules for every service, price, ownership and complaint field.
11	Functional separation	Separate professional regulation, business monitoring, data access, ADR oversight and representative activity through a CMA-approved governance protocol.
12	Independent assurance	Provide for lay oversight, conflict controls, direct CMA access to records and annual independent audit.
13	User testing	Require participation by pet owners, consumer organisations, accessibility users, independent data users and businesses of different sizes.
14	Complaints taxonomy	Map complaint data to every remedy, allow multiple coding and distinguish allegations from verified outcomes.
15	Implementation reporting	Publish an early operational dashboard while retaining the final report's 24-month period for mature complaint insights.
16	Legal identity	Add the responsible legal entity and unique identifier alongside the recognisable consumer-facing ownership identity.

Conclusion

The CMA's remedies represent a significant opportunity to improve transparency and accountability in veterinary services. IVETGO.org supports their implementation. The legal instruments should, however, preserve the monitoring and market-opening ambitions of the final report rather than narrowing them through operational drafting.

The most urgent amendment is to restore a genuine random and routine monitoring baseline. A scheme that checks businesses only after risk has already become visible cannot provide assurance about the market as a whole. The second urgent amendment is to ensure that the restriction on paid-for rankings does not unintentionally bar neutral comparison services merely because they charge users or operate through a sustainable funding model.

With the changes proposed in this response, the Order and Undertakings would be better equipped to generate reliable information, identify non-compliance, support meaningful comparison, protect independent clinical judgement and command public confidence.

Annex A. Proposed drafting amendments

The following wording is intended to identify the legal and operational effect sought. IVETGO.org recognises that the CMA may adapt the language to fit the defined terms and drafting conventions used in the final instruments.

Ref.	Provision / issue	Purpose	Proposed wording
A1	Undertaking 3.5 - monitoring model	Require random, stratified routine checks in addition to risk-based checks.	The RCVS shall operate: (a) a random and stratified programme of routine compliance checks sufficient to provide a reliable baseline of compliance across Relevant Veterinary Businesses; and (b) additional risk-based checks where information indicates a risk of non-compliance. The programme shall include single-site and multi-site businesses and shall be documented in an annual monitoring plan approved by the CMA.
A2	Undertaking 3.5 - notice	Preserve evidential value of digital checks.	The RCVS need not provide advance notice of checks confined to publicly available websites, price information, Find a Vet records or other digital material. Reasonable notice shall be provided only where physical access or operational records make notice necessary and proportionate.
A3	Undertaking 3.7 - complaint sample	Set a minimum annual sample.	At least annually, the RCVS shall examine the complaint processes and complaint logs of no fewer than 50 First Opinion Practices and Out-of-Hours Centres, or such statistically justified alternative sample as the CMA approves. The sample shall include single-site and multi-site businesses and shall be stratified by size, ownership and geography.
A4	Undertakings 3.8-3.10 - recording	Preserve history of corrected breaches.	The RCVS shall record every suspected and confirmed instance of non-compliance, including the evidence considered, corrective action, completion date and any previous related incident, irrespective of whether the matter is resolved without formal CMA action.
A5	Undertakings 3.8-3.10 - escalation	Prevent indefinite informal remediation.	Serious, deliberate, repeated or materially consumer-harming non-compliance shall be referred to the CMA without delay. Other breaches shall ordinarily be corrected within 10 working days. No more than one extension may be granted without CMA approval, and the reasons and revised deadline shall be recorded.
A6	Undertaking 4.4 - update timing	Make Find a Vet current and auditable.	The RCVS shall publish a complete and validated update no later than the end of the next working day after receipt. Find a Vet shall display the date from which the information is effective, the date last updated and, where applicable, that a notified update is pending. The RCVS shall report update-time performance to the CMA annually.
A7	Undertaking 4.5 - user testing	Make consumer and accessibility participation mandatory.	The RCVS shall undertake and document user testing with pet owners, consumer organisations, disabled users and users of assistive technology, persons with limited digital confidence, Relevant Veterinary Businesses of different sizes and ownership models, and current or prospective independent data users.
A8	Undertaking 4.7(b) - rankings	Target paid influence, not the service funding model.	No Approved Third Party may display or use a ranking in which the position, prominence, labelling or treatment of a Relevant Veterinary Business is influenced, directly or indirectly, by payment, sponsorship, promotion or other consideration provided by or on behalf of that business. This does not prohibit charging users, subscriptions, grants, donations or general advertising revenue where these do not influence the ranking.
A9	Undertaking 4.7(c) - access decisions	Make gatekeeping predictable and reviewable.	The RCVS shall determine a complete application within 30 working days, provide written reasons for any refusal or condition, and inform the applicant of the right and procedure to appeal to the CMA. The RCVS shall maintain a public register of approvals, refusals and appeal outcomes, subject to lawful confidentiality.

Ref.	Provision / issue	Purpose	Proposed wording
A10	Undertaking 4.8 - criteria consultation	Require input from all affected groups.	Before adopting or materially revising criteria for Approved Third Parties, the RCVS shall consult pet owners, consumer organisations, accessibility representatives, Relevant Veterinary Businesses, independent data users and the CMA, and shall publish a response explaining the final criteria.
A11	New governance provision	Separate potentially conflicting functions.	Before commencement, the RCVS shall submit for CMA approval and publish a governance protocol providing operational separation, conflict controls, lay oversight, written decision standards and independent audit for its functions under these Undertakings. The CMA shall have direct access to underlying records necessary to verify performance.
A12	Schedule 4 / Undertaking 7 - complaint data	Make remedy performance measurable.	The prescribed complaint-log format shall contain remedy-linked issue codes, permit multiple codes for a single complaint, and record key dates, outcome, corrective action, mediation status, responsible site and common ownership group. The RCVS shall publish a data dictionary and distinguish allegations from verified findings in all reporting.
A13	Undertaking 7 - ADR reporting	Measure access, timeliness and outcomes.	The RCVS shall obtain and publish aggregate measures of mediation eligibility, participation, time to first contact, time to closure, completion, user experience and implementation of agreed outcomes, while preserving case confidentiality.
A14	Find a Vet data specification - legal identity	Add a unique accountable identity without displacing recognisable ownership disclosure.	In addition to the consumer-facing Main Entity or trading name, the structured Find a Vet record shall state the legal person responsible for the Relevant Veterinary Business, its company or partnership registration number where applicable, the category of ownership, control or significant influence, the effective date and the date last verified.
A15	Annual public implementation dashboard	Provide early transparency without prejudging complaint trends.	The RCVS shall publish annual aggregate information on the number and type of compliance checks, suspected and confirmed breaches, remediation periods, extensions, CMA referrals, complaint logs reviewed, data-access decisions and Find a Vet update performance, disaggregated where practicable by business size, ownership model and remedy.

Annex B. Official documents considered

All documents cited below were published by the Competition and Markets Authority or made available through the CMA consultation portal. References in the body use the numbers shown in square brackets.

[1] Competition and Markets Authority, “Vets market investigation: draft substantive Order and Undertakings”, consultation opened 21 July 2026 and closing 20 August 2026. Official source

[2] Competition and Markets Authority, Veterinary services market investigation: Final decision report, Part B, 24 March 2026. Official source

[3] Competition and Markets Authority, Draft Veterinary Services Market Investigation Order 2026. Official source

[4] Competition and Markets Authority / Royal College of Veterinary Surgeons, Draft Undertakings. Official source

[5] Royal College of Veterinary Surgeons, Monitoring proposal supporting the draft Undertakings. Official source

[6] Royal College of Veterinary Surgeons, Annex A: monitoring flowchart. Official source

[7] Competition and Markets Authority, Draft Explanatory Note to the Veterinary Services Market Investigation Order 2026. Official source

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SUPPLEMENTARY SUBMISSION

CMA Veterinary Services Market Investigation – Draft Substantive Order and Undertakings

Ownership transparency, ultimate control, out-of-hours services and complaints monitoring

20 August 2026

Purpose of this supplement

This short submission supplements IVETGO.org's main response dated 19 August 2026. It does not seek to reopen the Inquiry Group's final findings or remedy decisions. It addresses a narrower implementation question: whether the proposed Order and related monitoring arrangements make ownership and control sufficiently transparent, particularly where first-opinion, out-of-hours (OOH) and referral services sit within the same group, and whether complaint data will be granular enough to test how the OOH remedy works in practice.

1. Executive point

The Draft Order already recognises that veterinary services may sit within a Group or Network and that ownership, control and influence can extend beyond the individual practice. The remaining question is whether the required disclosure will always take a pet owner far enough up the ownership chain to identify the economically relevant controller, and whether common control is visible at the point at which the owner is directed from a daytime practice to an OOH provider or referral centre.

The practical principle is simple: where commercial control sits above the retail practice or UK operating group, transparency should follow that control sufficiently far to be meaningful. That does not imply misconduct by corporate or investment owners; it is an accountability and consumer-information issue.

2. Article 5: Main Entity and ultimate control

The Draft Order defines a "Main Entity" by reference to ownership, control and influence factors and then requires Ownership Information principally by reference to that entity. The CMA's Final Report also indicates that the consumer-facing ownership remedy was intended to identify recognisable group names such as IVC Evidensia, CVS, VetPartners and Linnaeus, rather than necessarily naming every entity higher in the ownership chain. IVETGO.org therefore does not suggest that the CMA overlooked ultimate ownership. The narrower question is whether the final regime should also ensure that the RCVS and CMA hold clear, current information identifying the ultimate controlling or materially influencing entity where that differs from the consumer-facing Main Entity.

This distinction between consumer-facing identity and regulatory accountability is practical rather than theoretical. The CMA's own material identifies UK large veterinary groups whose retail or operating identities sit beneath corporate or financial ownership structures. IVC Evidensia is an EQT portfolio company; VetPartners was acquired by BC Funds; and Linnaeus is part of Mars Veterinary Health/Mars Petcare. These examples are UK-relevant and are used only to show that the group name presented to a pet owner and the economically relevant controller may be different.

Requested clarification – ultimate control

Retain the recognisable consumer-facing Main Entity required by the remedy, but clarify in Article 5, the Explanatory Note or guidance that the RCVS and CMA should also hold sufficient ownership/control information to identify the ultimate controlling or materially influencing entity where that differs from the Main Entity. Public display of every passive investor is

neither necessary nor proposed.

3. Common ownership of daytime, OOH and referral services

The Draft Order already treats OOH FOP Services, OOH Provider Services and Referral Services as relevant connected services. The consumer issue is therefore whether common ownership is sufficiently visible at the decision point. A pet owner directed from a daytime practice to an OOH provider or referral centre should be able to tell whether the destination is independent or under common ownership or control with the referring business.

Requested clarification – OOH/referral ownership

Require or expressly confirm clear disclosure, at the point of direction or referral, where the FOP and OOH provider or referral centre are under common ownership, control or material influence.

4. Article 22 and Draft Schedule 4: OOH complaints

Article 22 is useful because it requires complaint logs for both FOPs and OOH Centres. However, Draft Schedule 4 currently uses the broad sub-category "Out of hours related complaint". That is unlikely to distinguish the different ways in which emergency access can fail.

A small standard set of OOH sub-categories would allow the RCVS and CMA to distinguish pricing complaints from failures of access, response or continuity. The log should be capable of identifying, for example, inability to contact or obtain triage; delayed callback, attendance or treatment; refusal, redirection or non-acceptance; distance or transport barriers; handover or continuity-of-care problems; and OOH fees or payment issues.

Requested amendment – Schedule 4

Replace or supplement the single "Out of hours related complaint" entry with a small standard set of OOH sub-categories covering access, delay, refusal/redirection, distance/transport, continuity/handover and pricing.

5. Why this remains within the CMA's implementation remit

These points do not ask the CMA to revisit its substantive findings. They concern whether the drafting and monitoring arrangements fully implement remedies the CMA has already chosen: business-level ownership transparency, visibility of connected services, effective oversight and usable complaint information.

Monitoring use

Use the resulting OOH data to assess whether the remedies improve not only contractual switching and disclosure, but the practical experience of pet owners seeking emergency care.

6. Conclusion

The Draft Order is an important step because it treats veterinary businesses and groups as regulatory subjects rather than looking only at individual professionals. The remaining drafting task is to ensure that ownership transparency follows control far enough to be meaningful and that common ownership is visible when owners are moved between daytime, emergency and referral services. More granular OOH complaint coding would then provide the evidence needed to test whether those arrangements work in practice.

Sources

- Competition and Markets Authority, consultation page: Draft Substantive Order and Undertakings, 21 July 2026.
- Competition and Markets Authority, Draft Veterinary Services Market Investigation Order 2026, especially the definitions of Group or Network and Main Entity, Article 5 and Article 22.
- Competition and Markets Authority, Draft Schedule 4 – Complaint Log.
- Competition and Markets Authority, Summary of the Final Report, 24 March 2026.
- EQT, IVC Evidensia portfolio page and EQT IX fund information.
- BC Partners, VetPartners portfolio information.
- Mars / Linnaeus / Mars Veterinary Health information.