



VCMS Response to the CMA Consultation on the Order, Undertaking and Explanatory Note published on 21 July 2026

Response dated 18 August 2026 (for publication)

The Veterinary Client Mediation Service ('VCMS') has reviewed the Veterinary Services Market Investigation Order, Schedules, Annexes, Undertaking published in July 2026. This response document focuses on the aspects of those documents which relate to the veterinary complaints and redress.

The VCMS

The VCMS provides veterinary clients and practices with a mediation-based, free at the point of use complaint resolution process. The service was established in 2017 by the Royal College of Veterinary Surgeons. The RCVS continues to fund the service from the registration fees paid by individual veterinary professionals. Nockolds Solicitors is contracted to deliver the service, which is an 'Approved Alternative Dispute Resolution (ADR) body'. Veterinary consumers can contact the VCMS directly. The service provides complaint resolution support in several ways. At a local resolution level, the service helps consumers to raise complaints with their veterinary practice and achieve resolution through the practice complaint process. Where local complaint procedures have been exhausted, the VCMS offers telephone mediation. Veterinary practices are then invited to participate and engage in over 80% of invitations. The service currently receives around 350 referrals a month. The service has a resolution rate of 80%.

The points considered or commented on in this document are not an exhaustive analysis, and the VCMS is keen to continue to be involved in further considerations and implementation actions.

It is noted that the response to the consultation is to focus on:

- a) whether the substantive order is consistent with the decisions in the Final Report
- b) the manner in which the draft Order would give effect to the decisions in the Final Report; and
- c) the facts and matters that the CMA considers justify the making of the Order the form proposed (or any facts and matters a party considers do not justify the making of the Order in that form).

Part 7

General points

The VCMS has welcomed the opportunity to engage and feed insight into the CMA's work and analysis of the household pet veterinary market, and then to continue to contribute insight and practical experience/expertise in relation the Complaint and Redress outputs.

The VCMS would also wish to echo previous comments regarding the improvements, developments and commitment of veterinary professionals in relation to client care and complaint handling over the last 10 years. The CMA have rightly recognised the passion and commitment of both pet owners and veterinary professionals in caring for the UK's pets and we continue to see examples of collaborative and trusted relationships which deliver high standards of care and satisfaction for all involved.

Our insight consistently tells us (and the sector) that a key factor in the satisfaction of veterinary consumers i.e. pet owners is trust and shared understanding of both the pet owners and the pet's needs, clear communication and collaborative decision making. As the CMA Order is implemented, the VCMS will continue to share insight and seek to support both veterinary professionals and pet owners with the implementation of the Order and the associated changes at practice level.

As a general point, the Order will apply to veterinary business delivering veterinary care to household pets (and for some, first opinion practices only). The VCMS mediates complaints from consumers obtaining veterinary care across the sector, so extending beyond household pets. While we appreciate the remit of the CMA is veterinary services for household pets, the VMCS will also seek to provide explanation and guidance where the outputs of the CMA Order provide consumers who are owners of household pets with differing protections or arrangements from other consumers.

The VCMS are committed to supporting pet owners to help them develop the best possible relationship with their local veterinary team. We recognise that clear communication, mutual respect and a shared understanding of expectations are key to building a positive and effective partnership. This can be supported by encouraging open and honest conversations, asking questions when information is unclear, discussing concerns at an early stage and working together to agree on realistic expectations and appropriate

care. By fostering a relationship based on trust, communication and shared decision-making, consumers and veterinary teams can work together to achieve the best possible outcomes for both pets and their owners.

Table 1 Summary VCMS comments Part 7

Order section	Point	VCMS comment - Order	VCMS comment - Explanatory Note/Schedule
21	Decision tree & complaint policies	The VCMS remains committed to working closely with other stakeholders so as to support the generation of a working and useful documents which provides clarity for consumers. Given the complexities of the complaint landscape, this will require careful consideration.	

22	Complaint log		Schedule 4 – Complaint Log: Fields Summary of the Actionable Complaint and Steps taken by the veterinary business to investigate the complaint These would appear to be a free text boxes. The VCMS would suggest it would be helpful for veterinary business to have some guidance in the Explanatory Note regarding free text boxes. This could include guidance on level of detail, word limits etc. Para 175 of the Explanatory Note states the log should be accurate and complete at the date of submission and include complaints made within the year (whether they have been resolved or not). Guidance is needed on the Nature of Complaint and Sub-nature fields and whether the categorisation is based on the complainant's raised issues or the substantive issue in the complaint, which may only be ascertained at the conclusion of the complaint. It is possible that a complaint may be received just prior to the log being submitted and the full details are to be ascertained. This option may need to be included in the categorisation for completeness, but needs careful use as there is a risk of it being incorrectly selected.
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22	Complaint Log		Schedule 4 – Complaint Log: Lookups – Nature of Actionable Complaint and Sub-nature of Actionable Complaint If the purpose of the log is to provide data analysis for the Annual Insights Report (Undertaking paragraph 7.17), then it will be necessary for the complaint categorisation to be accurate and meaningful. For the log to be completed accurately by veterinary businesses, further guidance will be needed around the categories. The VCMS/Nockolds has experience of this in producing the data analysis for the VCMS annual reports. Based on this experience, the VCMS/Nockolds have included a suggested revised categorisation list for the CMA to consider. <u>VCMS Response - Draft Schedule 4 - Complaint Log</u>
23	Mediation		The VCMS will be looking to support veterinary businesses and pet owners with resources to aid understanding on the expectations around participating in good faith, when the requirement applies and how to engage positively and constructively with the VCMS mediation process.

For further information, contact:

Jennie Jones, Head of VCMS and Partner of Nockolds
jenniejones@vetmediation.co.uk

vetmediation.co.uk