

## Response to Competition Marketing Authority's market investigation - veterinary services

### **My background.**

My professional life has been spent working in social services, local government, and the NHS. As well as various roles for the Anglican Communion in Cheshire, Barking and Dagenham and Liverpool. I have had a lifelong love of Cats which has led to over forty years of sharing my home and heart with various domestic felines all of whom were rescues.

I greatly welcome your report Veterinary Services for Household Pets in the UK. I thought I was well versed in the veterinary corporate stakeholder company's shenanigans but even I admit to being shocked seeing it all together in your 60 page document. Two thoughts come first:

1: How did the CMA let this happen? Yes, it happened on your watch.

2: What on earth has the "regulator" of the profession been doing during this time? Apart from rocking up at Westminster at regular intervals asking for a new Veterinary Surgeons Act?

One very important fact your report omitted was that here in Cymru and in England under the Animal Welfare Act 2006 an owner of an animal can be prosecuted if they fail to get their animal veterinary treatment. A piece of legislation I, like many others campaigned long and hard for.

### **My experience.**

When I came back home to Cymru in 2005 I had one Cat, Benny followed by a succession of foster cats and kittens from various rescues. When you have an animal, a good honest qualified vet is essential. I chose the only veterinary practice in Caernarfon. Cibyn is still the only VP there. Caernarfon is a close-knit community and those who worked within that practice were part of that community too. It was a small animal practice which was one of the reasons I chose it, I made the right choice. Due to an experience I had with a veterinary practice in Merseyside I knew I was fortunate. The staff there were dedicated, passionate and were led by an amazing couple who were both veterinary surgeons. Caernarfon is a holiday hot spot, but our local politicians will tell you it also has some of the most deprived wards in Cymru.

In 2010 after I lost Benny who received exceptional care, as I did too, I adopted Rosa, a cat who had been abandoned, abused and clearly by her behaviour and physical clues regularly beaten. In 2013 Gracie joined our family, a failed foster. I, of course in a heartbeat chose Cibyn Veterinary Clinic for them too.

A few years later I learnt the practice was up for sale and I understood the reasons why. The corporate stakeholder companies are like the grim reaper, they wait in the shadows, their timing is perfect. So, in 2014 Independent Vetcare Evidensia stepped in. I was assured by one of the veterinary surgeons, a brilliant one, that nothing would change for Rosa, Grace, and I.

As your report mentions the practice name never changed and to add to the confusion one of the former owners who was an eye specialist stayed practising at the clinic. My Rosa was euthanised at my request on 7<sup>th</sup> December 2018 at a practice here on Ynys Môn that I had gone to for a second opinion. This practice is owned by CVS.

I later discovered from reading her clinical notes (the unaltered version) test results and diagnostics

show that she may not have been FIV+. This analysis was also confirmed by one registered veterinary nurse and three separate veterinary surgeons whom I trusted with Rosa's full clinical notes and diagnostics. This condition was the reason Independent Vetcare Evidensia refused Rosa the medication she badly needed. Rosa's clinical notes also state "asks a lot of questions"!

I attach a page of Rosa's clinical notes (Appendix 1) which show the last consultation I had at Cibyn Veterinary Clinic on 10/11/2018, I have removed two veterinary surgeon's names and a receptionist too. Here you see upselling at its finest on that Saturday morning - I saw a vet who had never seen Rosa or I, but I had met her before.

- 1: Rosa was never a member of IVC's "health plan"
- 2: Rosa was prescribed a year's course of flea and worm treatment.
- 3: Rosa was also injected with a drug branded as Convenia.
- 4: Rosa was prescribed a bottle of Metacam. Which I took home.

All of the above is false. But as I later discovered pie charts, performance related pay including how quickly surgical procedures are done. Non-Disclosure Agreements (for Clinical Directors) are all part and parcel of working for a private equity shareholder veterinary company.

It warms my heart to be able to tell you the veterinary surgeon who saw my Rosa and I that day in 2018 found a way out of the corporate machine and now leads the clinical team in the only Independently owned and run veterinary practice in Gwynedd and Ynys Môn. A close family member of theirs and long-time friend of mine told me they had left "because IVC was asking them to do awful things they didn't agree to. But they are so much happier now where they work".

When I made that appointment the same day Rosa and I were seen. The receptionist failed to tell me that because it was a Saturday morning the consult fee would be twice the normal charge. But if I had worked for IVC maybe I would have been overworked enough to forget to pass that information on.

While I accept it was my decision to request euthanasia for Rosa, I will never be convinced I had all the correct information to make an informed decision. The loss of a family member is devastating for anyone. To have to accept you sent them to their death in error is simply indescribable. I tried to take my own life shortly after I discovered that. I could no longer live in Dyffryn Nantlle in the shadow of Yr Wyddfa because at every turn I saw my beautiful Rosa. I have been left with PTSD, recurring nightmares, the list is endless. After a surgical procedure under GA at Ysbyty Gwynedd in Bangor in April 2020 a nurse asked me about my daughter Rosa. In their recovery room as I came round, I screamed her name apparently asking her if she knew where she was.

#### **After Rosa.**

A very dear friend of mine known as Archbishop Desmond Tutu, Arch to me, once told me "Linda if you see someone trying to jump in a river it may be a good idea to look up stream to see the reason why".

Since I lost my Rosa that is what I have tried to do. I learnt all I could about the big six corporate shareholder veterinary companies. Spent hours on the phone talking to veterinary professionals at their wits end. When SARS Covid allowed, I travelled UK wide including Scotland, Northern Ireland, and the Republic of Ireland meeting with vets from veterinary schools, referral practices in my attempt to understand. Then other families started to contact me too. In the words of Beverley Cuddy, Editor of

Dogs Today magazine “We are all members of a club we didn't want to join”. Slowly I have gained the trust of many veterinary professionals still left at the coal face. Many have become valued friends.

Just a fortnight ago a highly educated, informed politician the leader of Plaid Cymru in Westminster accused me of “vet bashing”. That hurt because of the regard I have for Liz Saville Roberts AS/MP. I can understand but I find it hard to condone those that have chosen not to somehow recognise what is going on. Even though the veterinary corporate's work is on a need-to-know basis. I know from experience, a clinical director, a registered veterinary nurse, even a practice manager working in the same veterinary practice are never given all the information. The veterinary corporates are about as transparent as a block of concrete.

### **RCVS - Veterinary Surgeons Act 1966.**

As your report mentions the Royal College of Veterinary Surgeons – RCVS claim to be the statutory regulator. They are by their own admission a self-regulating body. Run by legal experts who have little experience of animal welfare. Many including the eifa committee of the UK Government have repeatedly stated they are not fit for purpose. The college's relationship with the veterinary corporate's is almost incestuous. The attached screenshot (Appendix 2) from the biggest corporate stakeholder company Independent Vetcare Evidensia demonstrates this perfectly too.

In a freedom of information request the RCVS informed me that last year they received £2,389,169 from the corporate stakeholder companies (Appendix 3).

I also firmly believe that the RCVS are more likely to take disciplinary action against professionals that practice independently rather than working for a corporate. The RCVS have informed me they keep no such data in regards ratios. With £1 billion pounds of profit in 2023 (IVC) am sure the corporates can afford top notch legal teams in stark contrast to your average Independent practice here in rural north Wales or the south Wales valleys. The British Veterinary Union - part of Unite has gone on public record in regard to the RCVS stating that they “function as an old boys club”. Followed by “there is a strong distrust in the ability of the RCVS to perform its duty as a regulator”.

In paragraph 26 your report correctly states that the RCVS's remit is in relation to individual practitioners not in relation to practice owners e.g. the corporate's. However, in the RCVS legislation reform consultation of 2020/21 the plans to give the RCVS this power was dropped by them.

As a gauge of how those on the front line in the profession feel may I suggest you look at the RCVS's own data in regard to voting for elections and responses to consultations etc. Your report is correct when it states this is a profession in crisis. Which clearly is multi factorial and hasn't happened overnight.

I have deep reservations that a new Veterinary Surgeons Act, will help matters at all. It's my strong belief that if this legislation is revised. It will only add to the pressure of an already overstretched, demoralised, depleted workforce. Plus, do very little to help us or our family members.

I was horrified but not surprised when Dr Malcolm Morley on behalf of the British Veterinary Association - BVA stated that on the back of your previous findings they hope a new VSA would now become a reality. Rather simplifying and in my view conveniently ignoring the vast majority of the issues you raised. Could this have anything to do with the fact Dr Morley works for a corporate stakeholder veterinary company?

## **Animal Welfare**

I have always been deeply concerned in regard to the impact the policies of the corporates are having on animal welfare. The cost-of-living crisis together with the fall out after SARS Covid have just compounded matters. This varies because of demographics but here on Ynys Môn and in north Wales it is a dire situation. The phone calls I take for Rosa's mobile vets only serve to confirm this.

The effect the present situation has on the rescue sector is immeasurable, every indicator backs this up. From abandonment, animals being signed over, to rescues having to close. Even the larger corporate style charities are pooling their resources or in the case of Cats Protection temporarily withdrawing their neutering voucher scheme. Citing raising veterinary fees and demand as the problem.

Mrs Eileen Jones CEO of Friends of Animals Wales, stated in a recent submission to our Senedd Cymru:

"The condition of the animals coming direct from homes is mainly dire. Many owners are handing in because they are unable to fund ongoing health conditions or animals have become unwell or injured and owners cannot pay for treatment".

Paragraph 18 of your report states that the corporates have strategies to keep everything in house including within their own referral practice's. I have spoken to clinical staff who have told me that the corporate's keep a record of how many times as VS in a first opinion practice fails to refer to a second opinion practice within their company. They live in fear of being disciplined and in fact often are.

Many professionals from Independent referral practices have also stated that they are having to perform complex operations in order to reverse these procedures. I would argue that the guidelines from the RCVS are being breached by the profit driven corporate's desire to keep everything in house. I also know that referrals to Independent second opinion practices come too late for many.

## **The Competition Marketing Authority's Remit.**

I note your timescale of further investigation is possibly two years. I find this deeply concerning especially as I have already stated this all was allowed to happen during your watch.

I would argue that this report and consultation is different to all your others. This one doesn't concern a tin of beans or a packet of frozen peas but sentient beings who are protected by law. I am appalled that in your previous consultation you chose not to use all your powers. Including choosing not to engage with us families or carers to the same degree as some veterinary professionals who gave evidence orally.

I would equate this to trying to do a jigsaw only using half the pieces of the puzzle. It simply isn't possible.

I would of course be willing to assist you further.

Dr Linda Joyce-Jones

Ynys Môn, Cymru  
11/4/2024

Appendix 1:

### Medical History

Medical History for: Miss Linda Joyce-Jones  
 Tegan S. [redacted] [redacted]  
 Patient Name: Rosa Posaż  
 Species: Feline  
 Breed: Domestic Short Haired

Sex: Neut Female  
 Age: 9 Years 6 Months 16 Days  
 DOB: 12/05/2009  
 Microchip No: 958000001741393

Date	Description	Site	Vet	Qty
	Plan to GA, examine larynx visually while placing tube and assess laryngeal mass. Then proceed to thoracic Xrays to include neck on same plate if poss. Must keep within estimates. History - Sent to Operation list.			
31/10/2018 12:05	Anaesthetic - Cat (induction and first 40 mins)			1.00
	Anaesthetic - Cat (induction and first 40 mins) (Health Plan Discount)			1.00
	Hospitalisation - Day Patient			1.00
	Hospitalisation - Day Patient (Health Plan Discount)			1.00
	IV - Catheter Placement			1.00
	Surflo IV Cannula No Port Wings G22x25mm (50) (ea) (IMS)			1.00
	Sedator Inj 10ml (per ml)			0.03
31/10/2018 12:06	Propofol Plus 20ml Vials (5) (per ml)			1.50
	Torbugesic Inj 10ml (per ml)			0.10
31/10/2018 12:07	X-ray - SA opinion (up to 3 images)			1.00
	X-ray - SA opinion (up to 3 images) (Health Plan Discount)			1.00
31/10/2018 12:16	GA and chest rads (CT/SLJ). Pre-med with medetomidine/butorphanol IM to good effect. 22G IV catheter placed in left cephalic vein, induced with 1.5mls propofol IV. Laryngoscope exam of larynx performed - no obvious masses or inflammation, but did feel subjectively thickened and a little difficult to pass 4mm ETT.  Right and left lateral and DV inflated chest rads taken. Mild bronchial pattern and possibly a little right sided heart enlargement (cor pulmonali due to increased resistance from bronchial inflammation??) But only very mild changes... No evidence alveolar disease or masses.  Possibly could suggest mild inflammatory disease ddx asthma. No dramatic findings. Called owner with results, no answer so left message and will call her again later.			
31/10/2018 12:18	Document Created - Discharge Simple.doc			
31/10/2018 14:20	pm check - a little sleepy still, MM pink and moist, CRT <2s, cardiac and thoracic auscultation NAD, HR 120bpm, RR 24bpm, abdo palpation NAD, comfortable. T 36.4, a small amount faeces in rectum.  Comfortable, stable, would like to keep her here to recover for an hour or two but then fine to go home.			
31/10/2018 16:43	Discharged to owner, taken through post-GA instructions and findings today. Recheck in a week. Book Consult Vet around 07/Nov/2018 to see [redacted] for 10 minutes			
10/11/2018 11:40	Weight updated from 2.97(Kg) to 3.15(Kg).			
10/11/2018 11:53	Consultation Consultation (Health Plan Discount) Vet Authorises Anti-parasitics for 12 months			1.00 1.00 1.00
10/11/2018 11:54	Metacam Inj Cat 2mg/ml 10ml (per ml) Metacam Inj Cat 2mg/ml 10ml (per ml) (Health Plan Discount) Convenia Inj 10ml (per ml) Convenia Inj 10ml (per ml) (Health Plan Discount) Metacam Cat 3ml (Give 3 kg dose once daily for 6 consecutives days Stop if your pet vomits or passes dark stools and contact your vet) Metacam Cat 3ml (Health Plan Discount)			0.31 0.31 0.31 0.31 1.00 1.00
10/11/2018 11:55	Book <No Reason> around 10/Nov/2018 to see [redacted] for 10 minutes			1.00
10/11/2018 11:57	Discount £10			1.00

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Appendix 2:



John Dinsdale | Chief Veterinary Advisor  
ivcevidensia.co.uk



## About John

Chief Veterinary Advisor responsible for the Group Veterinary Advisors, Regional Clinical Director Support Group and Group Veterinary Nurse Advisor teams. Having had over 30 years experience owning a first opinion practice and out of hour's service provider, he brought his practice into IVC Evidensia. Main areas of work include, clinical standards, complaints, business support and development, RCVS Practice Standards, IVC Evidensia relationship with the RCVS, Major Employers Group and Vet School Council. As part of the Operations team he is also involved in the wider group strategy bringing a Veterinary surgeons perspective to the direction of the group.

## Get in touch

[john.dinsdale@ivcevidensia.com](mailto:john.dinsdale@ivcevidensia.com)



Appendix 3:

**3: I would like to know the exact figure (for the fourth time of asking) in regards to the amount of money the six major private equity shareholder companys fund the RCVS by each year. This includes all fees they automatically pay your organisation when they register their veterinary**

Royal College of Veterinary Surgeons The Cursitor, 38 Chancery Lane, London WC2A 1EN  
T 020 7222 2001 F 020 7222 2004 E [info@rcvs.org.uk](mailto:info@rcvs.org.uk) [www.rcvs.org.uk](http://www.rcvs.org.uk)



**surgeons or registered veterinary nurses with you. If you cannot provide this particular information, then I would like to know why not.**

The RCVS receives payments from corporate organisations in relation to specific costs, rather than any general funding. The costs include fees for the initial registration of practice premises and for the initial, or renewal of, individual practitioners' practising certificates. Branches of the six main corporate organisations also belong to the Practice Standards Scheme, and fees are paid to cover the assessments carried out for those premises. Because there is no standard approach to the payment of these fees (in that some are paid centrally and some by individual branches) it is not possible to provide an accurate figure.

To assist you, the total sum received collectively from the six major corporate practice owners for Registrants' renewal fees in the financial year 2022-23 was £2,389,169. We are unable to provide specific figures in relation to the individual organisations, as the number of Registrant employees is a matter of commercial sensitivity. As above, however, please also note that the nature of payment arrangements for registration varies, and not all of the corporate bodies pay the renewal fees for all of their Registered employees.

If you are dissatisfied with the handling of your request, you may:

- a. Write to Eleanor Ferguson, Registrar of the RCVS, at the RCVS offices (or email: [e.ferguson@rcvs.org.uk](mailto:e.ferguson@rcvs.org.uk))
- b. If you are not satisfied with the response that you receive, you may write to the Information Commissioner, who is appointed to consider such complaints at the address shown below:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire,  
SK9 5AF

Further information on how to complain is available on the Information Commissioner's Office website: <https://ico.org.uk/>

Yours sincerely,

**Gemma Crossley**  
Solicitor  
Head of Professional Conduct

Royal College of Veterinary Surgeons The Cursitor, 38 Chancery Lane, London WC2A 1EN  
T 020 7222 2001 F 020 7222 2004 E [info@rcvs.org.uk](mailto:info@rcvs.org.uk) [www.rcvs.org.uk](http://www.rcvs.org.uk)