



**BRITISH
VETERINARY
UNION** in Unite



British Veterinary Union in Unite (BVU) response to the review of the veterinary services market for pets by the Competition and Markets Authority (CMA).

Introduction

The BVU is a national professional branch of Unite the Union, the largest trade union in the UK and Ireland. The BVU is the only dedicated trade union for the veterinary sector, and we represent all workers in the sector, including but not limited to:

- Administrative staff
- Cleaning staff
- Managerial staff
- Receptionists
- Registered Veterinary Nurses (RVNs)
- Student Veterinary Nurses (SVNs)
- Veterinary Care Assistants
- Veterinary Medicine Students
- Veterinary Surgeons

Unite the Union has a national recognition agreement with the RSPCA, as well as local recognition agreements with the Mayhew Animal Home and Valley Vets, a Welsh subsidiary of Vet Partners.

The BVU has a branch committee comprising 18 elected individuals, who work in a range of roles across our sector, and commit their time to the BVU on a voluntary basis.

We have produced this response to the CMA review following a consultation with our members, to reflect their concerns on service provision and competition in our sector.



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Our response to the consultation

- Over the past 25 years, the veterinary sector has undergone significant change. The most significant factor has been the regulatory changes in 1997, which allowed for corporate ownership of a veterinary practice for the first time.
- As of 2023, the majority of workers in our sector are employed by one of the following 6 corporations:
VetPartners (BC Partners)
Linneaus (Mars Group)
IVC Evidensia
Medivet (CVC Capital Partners VIII)
Central Veterinary Services – CVS
Pets at Home Vet Group
In addition, the PDSA (People’s Dispensary for Sick Animals), a charity, is also a large employer on a national scale.
- During that timeframe, these companies have spent large sums of money buying up the majority of veterinary practices, significantly reducing the number of smaller, local competition in the process. This has fundamentally changed the nature of employment and career progression for veterinary surgeons in the sector, who were previously expected to eventually buy into a partnership with their employer as they gained experience and seniority. Presently, independent practices are far more likely to sell to one of the corporates listed above than to bring younger veterinary surgeons into ownership. This change has meant that the majority of the veterinary surgeons in the UK will remain employees, rather than partners, for the entirety of their working lives.
- As employees, and not partners or owners, veterinary surgeons expect to be treated in full compliance with UK employment law. Yet outdated and unlawful working conditions are common in the UK amongst both clinical and non-clinical staff, with an additional strain from clinical responsibly placed on vets and RVNs.
- Common unlawful practices include:
 - Failure to comply with the working time regulations, including the requirement to provide adequate breaks and rest periods between work
 - Poor health and safety compliance
 - Maternity discrimination
 - Disability discrimination
 - Discrimination on the basis of race, gender, gender re-assignment, sexual orientation, religion and age



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- Failure to pay minimum wage for hours actually worked when including unscheduled and unpaid overtime
- Failure to provide a contract/ statement of terms and conditions
- These poor working conditions, alongside the (legal but unethical) large amount of unpaid overtime expected of veterinary sector workers, are a major contributor to the sectors ongoing mental health crisis.
- As professionals registered with our governing body, the Royal College of Veterinary Surgeons, both vets and RVNs have a duty of care to our patients that does not apply to employers. There is a rapidly growing conflict of interest between employees and employer under this system, since those accountable for poor care are no longer in charge of the conditions of their workplace or the care they are allowed to provide. This has created an unacceptable situation where medical professionals are being held legally accountable for the consequences of poor practices or staffing shortages, introduced as company policy by senior management with no experience in a medical environment.
- Since the rapid expansion of the large corporates, several corporates are engaged in a race-to-the-bottom of working conditions. Many employers are looking to maximise profits over all ethical, medical and legal concerns.
Whilst working conditions and patient care may not be better in independent practices, large corporate structures make it increasingly difficult for veterinary workers to facilitate changes and improvements in their practice, and can lead to reduced clinical autonomy.
- In some geographical areas, the majority of practices are owned by one or two companies, and workers leaving a job would have to move to a new area to find alternative employment. We have heard of many cases of workers forced to do this anyway, with absurd restrictive covenants becoming standard among even young staff or new graduates. These pressures, and a lack of competition against the corporates, has resulted in awful working conditions becoming commonplace.

Pet owners may be unaware that all the practices in their area are owned by a limited number of corporations, as some corporates keep the branding of the local practice the same as prior to acquisition, which can be misleading.

- Workers often fail to raise grievances, whistle-blow or otherwise report concerns relating to their workplaces and working conditions, because they fear retribution; there is a concern amongst these workers that they may be “blacklisted” by their employer as a troublemaker. In areas where one or two corporates dominating the ownership of practices, this is a potentially career-ending prospect.



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- As workers in the sector, our members are in close contact with the public every day. Our members care strongly for their patients, and their owners. Our sector is not just any provision of service – the service we provide is essential to life or death of sentient creatures! These pets are members of the family to the vast majority of pet owners, and when their pet is ill this can be an incredibly emotional time. When there is a conflict of interest between the medical needs of the patient, and the financial circumstances of the owner, this can lead to much turmoil for all involved – owners and veterinary staff.
- The cost of the service provision is often fraught with emotion, and when pet owners are upset about costs, there is a tendency for frontline staff to bear the brunt of this. Pet owners often believe the clinician treating their pet influences the pricing structure of the business, which is very rare in the current employment climate of the sector. The BVU hopes this in particular can be highlighted in the report it produces for the public, because the abuse our members suffer on the basis of corporate profiteering, during a time of significant financial difficulty for millions of people, is another significant contributor to the mental health crisis faced by workers in our sector.
- When veterinary sector workers need to make decisions about the provision of external services, as asked in your questionnaire, there are a number of conflicts of interest that our members have highlighted to us. In many such areas, such as provision of cremation services and specialist referrals, our members have told us that they have concerns that there is a conflict of interest between company policy, and providing appropriate treatment and service to patients and clients.

For example, many of the corporate groups will monitor where veterinary surgeons make specialist referrals to, and they are advised and encouraged to make referrals to specialist centres within the same corporate group. However, there might be reasons these are not the best referral options for the pet and their owner – such as travel distance, waiting time, level of experience, and cost – but if they make too many referrals outside the corporate group, they can be penalised by their employer.

Similarly, some companies are making significant mark ups on cremation services, and where more reasonably priced external cremation service providers exist locally, workers can be penalised for recommending these alternatives to those provided by their employer. This penalisation can happen in two ways; either as direct penalisation from the employer, or, as the company's own service is billed directly to the client, through harming your average transaction value (ATV), a key performance indicator (KPI) upon which bonuses and performance reviews are often based.

Finally, in the provision of internal services, many corporations will have preferred drug stock lists. Sometimes, when the veterinary surgeon wishes to use a drug outside this list, it



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can be made difficult for them to do so, and they may need special permissions to order this drug for a particular patient and pet owner, which sometimes may be denied by the company. This can again limit the clinical autonomy of the professional in providing the best care for their patients.

- These examples show how corporate employers penalise their own workers for attempting to offer choice and good care to pet owners. Clinical staff in the sector are seriously concerned about loss of clinical autonomy while still having legal accountability for practices and policies they may object to, but are forced to follow.
- Other examples around poor competition in the job market, and poor mental health within the sector, lead to reduced retention within the sector. Failure to retain highly trained and experienced staff, leading to poor overall staffing levels have a huge impact on patient, as well as staff, safety.

Whilst there are no official figures about the rate of attrition from the profession, before planned retirement, there are surveys from the RCVS and other sources which suggest that large numbers of professionals do not stay in the sector for the full length of their working lives following qualification.