



August 23, 2018

Dear Mr Brady,

The Irish Veterinary Nursing Association wish to make the following preliminary submissions towards the Veterinary Council of Ireland (VCI) review of the Corporate Ownership of Veterinary Businesses in Ireland.

We believe that the timeframe provided to contribute to this consultation is insufficient and request that the deadline for submissions be extended. The IVNA have gathered general feedback from the veterinary nursing profession in relation to certain aspects of the impact of corporate ownership. However, there are many concerns relating to the legal implications and regulation of the profession with the introduction of corporate ownership and given the minimal timeframe for submissions it is not possible to submit fully informed opinions in this area without seeking legal counsel which this deadline inhibits.

On behalf of our members we wish to express our grievances in relation to the fact that this call for contributions towards the VCI review was not issued in a timely manner compared to our professional counterparts who received official correspondence from VCI offices one week prior to registered Veterinary Nurses.

We would also request an explanation as to why the Veterinary Nursing Profession does not feature in the VCI review primary objectives and tasks? We find both the delay in communications and this serious omission quite disturbing and as a result we question the Councils overall opinion with regards to the value our regulator places on the Veterinary Nursing Profession as a whole. Does the VCI value and respect the opinion of the Veterinary Nursing Profession, its contribution towards the Veterinary industry and services provided in Ireland? Does the VCI believe that the impact or consequences of Corporate Ownership of Veterinary Businesses in Ireland does not affect the Registered Veterinary Nurse? We would also like to request information on how the VCI have engaged with members of the public in requesting contributes from this demographic?

We find the fact that VCI neglected to consult with the professions prior to amending section 4. Practice Ownership in the Code of Professional Conduct in December 2017 another show of professional disrespect and a disregard for any subsequent consequences. It is extraordinary that council did not see fit to perform such a review in advance of these changes and at this point we wish to highlight concerns about a potential conflict of interest in this matter.

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We would ask if such a conflict was declared during the decision-making process by VCI member and then chair of the legislation and ethics committee Michael Sadlier, a partner in Troytown Greyabbey a veterinary practice which has recently incorporated. We also find it curious that the recent changes to the CVE regulations warranted two separate consultations with registrants but not the significant change in the landscape of the veterinary industry in Ireland by permitting corporate ownership of veterinary businesses.

We have concerns regarding the legal implications for registrants working for corporate entities and how this might affect the standard of services provided to the public. There is some perception from the veterinary nursing profession that corporates will improve the standards of services provided, this is a critical aspect of this review were opinions must be fully informed. This current perception is largely based on the standardised protocols and the investment in facilities which corporates bring, and it is believed that this will raise the standards of many practices currently operating. However, were clinical independence is considered many feel that working under management of corporate laystaff will impede such freedoms. It is also believed that the cost of veterinary services to clients will increase because of developed facilities, increased expenditure, KPI's and sales targets and we are concerned about how this will impact upon the wellbeing of registrants.

We have gathered information regarding the impact of corporate ownership on the working conditions of veterinary nurses. Overall the experiences of such are very positive in that the employment terms and conditions improve when compared to independent practice. This too is the general perception of Irish veterinary nurses as the existing working environment for the profession is very poor. This is the main reason for registered veterinary nurses leaving the profession and not as some may consider, a natural level of attrition. Experienced veterinary nurses are driven out of the profession due to lack of professional respect and poor working terms and conditions. Corporate ownership in the UK offers Veterinary nurses with defined contracts, progress reviews, pay reviews, CPD allowances, professional registration fees, structured HR policies, additional annual leave and sick leave benefits, rewarded upskilling and career progress opportunities many of which and in some cases all of which is not available to Irish Veterinary Nurses at present.

Given the fact that the IVNA strive to improve the working conditions of veterinary nurses in Ireland we would be supportive of these developments which corporate bodies would deliver. However, given the additional impact which these changes may bring, we must be permitted additional time to explore the legal concerns surrounding this change. Currently the profession has very little faith in the industries regulation as it stands, and we have grave concerns about the Veterinary Council of Irelands ability to regulate when corporate entities are not held accountable for their actions or any negative impact they may have on veterinary services provided to the general public.

Yours sincerely

IVNA Committee