Welcome and introduction

1) S. Everitt welcomed attendees to the second meeting of the working group to discuss the RCVS Legislation Working Party recommendations on separating registration and licensure, mandatory CPD and temporary registration.

2) Members were reminded that at the previous meeting it had been agreed that transparency and open lines of communication with the wider membership would be important throughout the process, particularly given some of the concerns circulating around some of the recommendations. Details of working group activity, including membership, minutes, and emerging themes had been published on the BVA website, and promoted via BVA’s weekly roundup and social media channels. Members had also been encouraged to feed in their views via the dedicated lwp@bva.co.uk email address.

Minutes of previous meeting held Thursday 5 November

3) Attendees confirmed the minutes of the previous meeting on 5.11.2020 as an accurate record.

4) S. Everitt clarified that registration and licence to practise are not separated by the NMC, therefore limited licensure is not permitted for overseas graduates as had been suggested at the previous meeting. Instead, overseas graduates in midwifery must sit a statutory exam before they are able to gain registration in the UK.

Review of discussions to date

5) Feedback from BVA Council and BVA members.

S. Everitt updated on feedback received to date from BVA Council and individual BVA members on the RCVS modernising registration proposals. The feedback highlighted that the group should consider:

- The financial and time cost of revalidation, as well as impact on work-life balance.
- Anecdotal evidence that the introduction of revalidation had impacted on the retention of doctors.
- How mandatory CPD could underpin revalidation eg. Whether a test would be required, whether the proposed systems would be outcomes-based.
- Whether separation of registration and licensure would impact on whether vets can provide emergency care for species that they do not revalidate in.
6) **Themes document**

Attendees were invited to review the working group’s ‘Themes document’ which detailed the direction of travel of discussions to date. Members were asked to identify any points for further discussion or gaps for inclusion.

In discussion it was noted that:

**Generally**
- There was a very intimate relationship between all of the RCVS proposals to modernise registration, the themes document and resulting BVA response should make clear that these proposals should be considered holistically and not in isolation.
- BVA’s response to these proposals should make clear that where we indicate support for a proposal, this is support in principle. Given the wide-ranging impact of the proposals, further consultation with the veterinary profession is required to sufficiently assess the detail of how these would work in practise, and identify any unintended consequences.

**Revalidation**
- While BVA should support the principle that the veterinary profession should be required to demonstrate their continued professional competence, the terminology used to describe this should be carefully considered by the RCVS eg revalidation, scope of practise or mandatory CPD.
- Any system of revalidation should be compassionate and versatile in order to take account of professional and personal circumstances.
- The implementation of revalidation would come with a significant cost to the RCVS, which may be felt by individual members through an increased in registration fees/cost of revalidation verification processes to cover costs.

**Limited licensure**
- Attendees reiterated that they did not support limited licensure at graduate level, and that graduates should be able to retain their omnipotential to enable them to diversify their careers. In addition, attendees reiterated their concerns that permitting limited licensure more generally would lead to a two-tier system, and devaluation of certain roles.
- Attendees recognised that at post-graduate level there may be cases where it is appropriate to permit some degree of limited licensure, eg where there is a workforce need for specialist expertise that would not otherwise be available in the UK. At present, specialists that have not graduated from a university with a degree recognised by the RCVS are not able to practise in the UK in their designated field without sitting the statutory examination or applying for temporary registration to provide specialist skills/teach a specific procedure in the UK.
- In this circumstance the working group supported the introduction of post-graduate limited licensure with appropriate controls to ensure limited licensure was not implemented more widely. For example, the veterinary profession could adopt a sponsorship model, whereby reputable employers would be able to sponsor specialists with a specific post-graduate qualification (ie. A post-graduate qualification recognised within the to work in the UK higher levels of European/American/ or similar global higher education frameworks). They would still be required to demonstrate that they meet the fit and proper person requirement of registration. A similar model was currently employed by the GMC.

7) **Separation of registration and licensure**

S. Everitt updated that at the previous meeting the working group had supported separating registration and licensure as an appropriate mechanism to enable revalidation and enable people with disabilities and health conditions to qualify as a veterinary surgeon and participate in the veterinary profession. It was also noted that separation of registration and licensure was a separate proposal as part of the RCVS legislative reform consultation. Attendees were invited to indicate whether BVA could support this proposal more generally, and any other impacts that BVA should capture in its considerations.
8) Overall, attendees agreed that BVA should support the RCVS proposal to separate registration and licensure. Following detailed discussion, attendees agreed that anyone performing an act of veterinary surgery should be required to obtain a licence to practise and demonstrate continuing professional competence in their scope of practice (e.g., through mandatory CPD or revalidation). However, registration relates to qualification as opposed to ongoing competence, therefore vets should not have to undertake CPD or revalidation to stay on the register. Instead, to maintain registration, each year after graduation vets should have to submit an annual declaration that they are a fit and proper person to be registered with the RCVS.

9) In discussion it was noted that:
   - Attendees strongly supported separating registration and licensure as an appropriate mechanism to widen participation in the profession, enabling schools to provide more reasonable adjustments so that people with disabilities and health conditions were able to meet the Day One Competences.
   - Further consideration would need to be given to how different scopes of practice would be defined, and how individuals could transition between these areas.
   - In medicine, licensure was introduced alongside revalidation. Doctors are only required to be licensed if they are directly involved in delivering patient care.
   - It was essential that the separation of registration and licensure did not stigmatise those in the profession who did not require a licence and were on the register. It must be made clear that licensure is for those carrying out acts of veterinary surgery as defined by the VSA, and did not mean a separation in standards, rather a difference in the way in which some professionals chose to use their veterinary skills.
   - Separation of registration and licence would remove the need for the non-practising register, and if positioned well, represented an opportunity to reiterate the value of all work, and diversity of careers, across the veterinary profession.

Mandatory CPD

10) The working group was asked to discuss and consider the RCVS proposal to underpin mandatory continuing professional development (CPD) with legislation to enable the RCVS to refuse renewal of registration if a regulated professional fails to meet their minimum CPD requirement.

11) Overall, in principle, the group supported the proposal to underpin mandatory CPD with legislation to enable the RCVS to refuse renewal of registration (or licensure in the context of the aforementioned proposal). Attendees agreed that veterinary surgeons should be required to demonstrate continuing professional competence to retain their licence to practise, and that mandatory CPD should form part of any future system of revalidation. However, the group were clear that any future system of mandatory CPD and revalidation must be flexible, compassionate and promote a culture of healthy self-reflection and learning.

12) In discussion it was noted that:
   - It was appropriate for there to be a mechanism in place, such as mandatory CPD, to maintain professional standards within the veterinary profession. However, the RCVS should be a compassionate regulator. As part of this, it was essential that any future system of mandatory CPD and revalidation was not punitive, and had mechanisms in place to take into account individual circumstances where CPD requirements were not fulfilled in the designated time period.
   - With this in mind, mandatory CPD should be required over a rolling period/cycle of years, as opposed to being an annual requirement. There should be a grace period for individuals who were unable to complete their CPD requirements where individual circumstances could be taken into account.
   - While accreditation of CPD would allow for quality assurance and a point-based CPD system based on quality rather than quantity, this may be difficult to implement, and also restrict beneficial learning opportunities for individuals.
Any future system of mandatory CPD should be outcomes-based and promote reflective learning (as opposed to focussing on a specified number of hours). It was noted that reflective practise will become compulsory from January 2022 under the current RCVS policy.

It was important to recognise that learning can occur in many environments, not necessarily solely through the traditional student-teacher dynamic eg. attendance at conferences. It was therefore important for there to be recognition that individuals have different learning needs and learning styles. Consideration should therefore be given to a system allows vets the flexibility to incorporate structured, semi-structured and unstructured CPD.

Mandatory CPD should be used as a channel for revalidation, however it was important that the flexibility of the current system of mandatory CPD should not be lost in any move to a system of revalidation.

When considering the potential impact of mandatory CPD and revalidation, consideration should be given to the time and cost impact across the whole profession (not just those with children) and general impact on work-life balance.

Temporary registration
13) The working group were asked to discuss and consider RCVS proposals to review the concept of temporary registration as a whole, and identify what the scope and objectives of future provisions should look like.

14) Overall, the working group agreed that temporary registration should be more tightly defined to ensure that individuals practising in the UK under temporary registration were practising for a clearly defined, limited period of time,

15) In discussion it was noted that:

- Temporary registration was currently being used to address gaps in specialist expertise in the UK workforce, where specialists who are unable to register with RCVS as their undergraduate degree is not recognised are given temporary registration for a specific role, as they would otherwise have to sit the statutory exam.
- Attendees supported the principles that human healthcare regulators (GMC, NMC, GDC) had used to define temporary registration. These principles clearly emphasised that temporary registration should only enable temporary and occasional service provision, and this should be infrequent and time-limited. The RCVS should adopt a similar principles-based definition.
- Future provisions should allow temporary registration to be granted for a maximum of 6 months, with a mechanism to consider requests to extend this on a case-by-case basis.
- Temporary registration would have to include temporary licensure for those carrying out acts of veterinary surgery if the RCVS pursued its proposals to separate registration and licence to practise.

Next steps
16) BVA Secretariat would circulate the minutes of the meeting and capture discussions on the ‘Themes document’ for circulation on Glasscubes for further refinement by the working group.

Date of next meeting
17) TBC, dependent on need.