Environment, Food and Rural Affairs Committee: Labour constraints inquiry

Who we are

1. British Veterinary Association (BVA) is the national representative body for the veterinary profession in the UK with over 17,000 members. BVA represents, supports and champions the interests of the veterinary profession in this country.

2. We are grateful for the opportunity to submit a response to this inquiry considering labour constraints.

Key points

- The UK veterinary workforce is highly reliant on EU graduates. In 2016, the proportion of new registrants from non-UK EU veterinary schools was 47%.

- In the meat hygiene sector, 95% of the veterinary workforce graduated overseas - with the clear majority of these coming from the rest of the EU.

- There is currently a shortage of veterinary surgeons in the UK, with an estimated shortfall of 11% reported by the Major Employer Group.

- After Brexit the demand for qualified veterinary surgeons will likely rise. In part driven by an increased volume of products requiring veterinary export health certification to facilitate trade.

- To alleviate labour constraints BVA has made the following calls upon Government:
  - To bring forward legislation that will give legal effect to the report on progress in phase 1 of the Brexit negotiations agreement and guarantee working rights for non-British EU vets and veterinary nurses currently working and studying in the UK.
  - Vets should immediately be restored to the Shortage Occupation List.
  - Prioritise the veterinary profession within future immigration policy. The Government should consider the economic and social impact the profession has, beyond its relatively small size.
  - Allow overseas nationals graduating from UK vet schools to live and work in the UK.
Introduction

3. The veterinary profession is relatively small, with around 23,000 UK-practising veterinary surgeons, but its reach and impact are significant. The UK veterinary profession is an integral part of the international scientific community using evidence and practical skills to further animal health and welfare, and public health.

4. Veterinary surgeons work across the economy, allowing strategically important economic sectors to operate successfully - this would be impossible without the contribution of non-UK EU vets. As the Government response to the House of Lords EU Energy and Environment Sub-Committee notes:

   “Many vets working in the UK are EU nationals…and the Prime Minister has made clear that securing the status of the veterinary workforce is a top priority.”

5. Only those registered with the Royal College of Veterinary Surgeons (RCVS) may practise veterinary surgery in the UK. The entitlement to be registered as a member of the RCVS is determined by the Veterinary Surgeons Act 1966. Applicants must have the requisite knowledge and skill to do so, and this must meet or exceed the minimum EU training requirements.

6. The demand for veterinary surgeons is likely to increase following exit from the EU. Nigel Gibbens, Chief Veterinary Officer UK, has suggested that the volume of products requiring veterinary export health certification could increase by as much as 325% in the case of no deal being reached between the EU and UK. The initial estimates suggest the figure for Northern Ireland could be more than twice that of the UK generally. It will be vital that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the European Union post-Brexit or from outside the EU, to ensure that essential veterinary work continues.

7. Before the EU referendum, UK veterinary practices were reporting difficulties in recruiting. This problem has been compounded following the Brexit vote, as non-UK EU vets are faced with considerable uncertainty about their futures. Therefore, as a first step, we ask that the veterinary profession is restored to the Shortage Occupation List.

8. A future immigration system must prioritise the veterinary profession. The Government should consider the economic and social impact the profession has, beyond its relatively small size. To ensure animal health and welfare; food safety and public health and the facilitation of trade which requires veterinary certification,

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due regard should be given to the specific needs of the veterinary profession including:

- The projected demand for veterinary surgeons following the exit from the EU;
- The difficulty in meeting this demand with UK citizen vets, including the time and resource needed to increase university capacity;
- The nature of veterinary practices as small businesses faced with the demands of an onerous visa based system.

**Workforce reliance on EU vets**

9. The UK veterinary workforce is highly reliant on EU graduates. Statistics from the Royal College of Veterinary Surgeons (RCVS) reveal the dependence of the UK on non-UK EU vets. RCVS currently registers around 1,000 overseas vets per year, of which EU nationals make up the clear majority. In 2016, the proportion of new registrants in that year from non-UK EU vet schools was 47%.³

10. In the meat hygiene sector, this proportion is even higher with estimates suggesting 95% of the veterinary workforce here graduated overseas - with the clear majority of these coming from the rest of the EU. Losing Official Veterinarians (OVs) from slaughterhouses would increase the risk of food fraud, provide the potential for animal welfare breaches, and remove a level of public health reassurance to consumers at home and overseas that could jeopardise trade. There are significant concerns within the meat processing industry about the potential impact of a post Brexit veterinary workforce shortage on the UK agri-food sector.

**Trade**

11. The import and export of animals and products of animal origin to third countries is dependent on veterinary certification. Veterinary certification is dependent on having available enough adequately trained veterinary surgeons.

12. Should the UK neither become a non-EU EEA country nor enter a customs union with the EU administrative checks would apply to UK imports from and exports to the EU as currently apply to trade with non-EU countries. Imports of animals or animal products into the EU must, as a rule, be accompanied by the health certification laid down in EU legislation.

13. Consequently, post Brexit there will almost certainly be increased demand for veterinary certification and supervision. Currently, up to 30% of OVs in the UK engaged in export health certification for exports of animals and animal products to non-EU countries are estimated to be EU nationals. Nigel Gibbens, Chief Veterinary Officer UK, has suggested that this could lead to the volume of animal

³ Royal College of Veterinary Surgeons, *RCVS Facts 2016, 2017*
products requiring veterinary export health certification increasing by up to 325% in the case of no deal being reached between the EU and UK.\textsuperscript{4} Ensuring the veterinary profession has the capacity to meet this demand will be essential to allowing continued trade.

**Academia and research**

14. The world-leading veterinary universities in the UK attract and retain the best minds from the EU. Researcher mobility is “of critical importance to the UK science community, including academia, business and charities”, and “researcher mobility must be protected if UK science and research is to remain world-leading”.\textsuperscript{5} This is true for veterinary science, where non-UK EU nationals make up 22% of veterinary surgeons working in academia in the UK, most of whom will be in roles directly linked to providing education and training within the undergraduate veterinary degree.\textsuperscript{6} Without non-UK EU vets, there will not be enough appropriately qualified vets to meet workforce needs.

**Clinical practice**

15. The Major Employers Group (MEG) represents large veterinary practices, corporate groups and charities that employ over 6,000 veterinary surgeons, predominantly in small animal veterinary practice, representing approximately 30% of all practising veterinary surgeons in the UK. MEG estimates that 30% of their combined workforces are non-UK EU graduates and these figures are borne out by RCVS data. MEG has also found that a higher proportion of non-UK EU graduates work full-time hours compared to UK graduated veterinary surgeons. This therefore increases their overall dependency on non-UK EU vets to above 30%.

16. A review undertaken by MEG in July 2017 of members providing first opinion clinical services direct to the public found over 600 vacancies open for primary veterinary surgeons in the UK. Based on MEG’s combined employment at the time of the survey, this represents a workforce shortage of around 11%.

**Short term impact since Brexit vote**

17. In the months following the UK’s decision to leave the EU, there was a reduction in the numbers of EU graduated vets registering to work in the UK. This contradicts the trend, which had seen a consistent increase in the numbers of vets from elsewhere in the EU.

\textsuperscript{4} Speaking at Official Veterinarian Conference 2017, reported https://www.vettimes.co.uk/news/non-uk-vets-essential-after-brexit-says-cvo/


Figure 1. Number of Non-UK EU graduated vet registrations 2008-2017 Data Provided by Royal College of Veterinary Surgeons

18. Before the EU referendum, UK veterinary practices were reporting difficulties in recruiting, with a BVA Voice of the Veterinary Profession (Voice) survey in early 2015 revealing that 40% of practices with vacancies had taken more than three months to recruit in the last year, or had withdrawn the vacancy due to a lack of suitable candidates.  

19. In the November 2016 Voice survey, members were asked whether the result of the EU referendum had affected recruitment of veterinary surgeons to their own organisation. Of the 650 vets who gave an opinion approximately one fifth reported that it had become harder to recruit, zero respondents reported recruitment of vets had become easier because of the Brexit vote. The Veterinary Public Health Association (VPHA) note that in the meat hygiene sector employers have seen a significant decrease in applications for veterinary roles since the referendum.

20. Following the decision that the UK should leave the EU, RCVS commissioned the Institute for Employment Studies (IES) to conduct three online surveys over a two-year period to gather the views and intentions of veterinary surgeons and veterinary nurses registered to practise in the UK whose nationality is non-UK European. Of those who responded to the first survey:

- 18 per cent are actively looking for work outside the UK;
- 32 per cent are considering a move back home;

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8 British Veterinary Association, *BVA Workforce Issues Survey*, 2017
• 40 per cent think they are now more likely to leave the UK.

21. Between 25th September and 6th October 2017, the Society of Practising Veterinary Surgeons (SPVS) conducted a survey on recruitment within the veterinary profession. The survey found a deterioration in the ability of practices to hire suitably qualified staff. In the 2015 survey 30% of those advertising a position had found it easy, defined as taking less than 3 months to identify a suitable candidate for a post. By the same definition, in 2017 only 22% of respondents had easily recruited a candidate, with 47% taking more than 3 months to find someone, whilst 31% had failed to find any suitable candidate at the time of response to the survey.

Future demand

22. Fulfilling demand for veterinary surgeons, following the departure of the UK from the EU will be essential to maintain animal health and welfare, public health, food safety and trade. As the House of Lords European Union Committee noted in the report *Brexit: farm animal welfare*:

> “Veterinarians play a key role in ensuring and inspecting farm animal health and welfare in the UK from farm to abattoir. They also play an important role in certifying animals in the context of trade. We note the overwhelming reliance on non-UK EU citizens to fill crucial official veterinary positions in the UK, and call on the Government to ensure that the industry is able to retain or recruit qualified staff to fill these roles post-Brexit.”

23. On leaving the EU, the UK will not merely need to maintain the current level of veterinary workforce, but also meet additional demands. Post-Brexit all EU countries may be regarded as third countries for the purposes of exports and imports. Consequently, there may be increased demand for veterinary certification and supervision. As the Institute for Government notes: “If the UK is required to undertake checks on animal produce coming from the EU, it will need an increase in the number of vets.”

24. The government has stated that “high environmental and food standards will not be diminished or diluted because of leaving the EU or establishing free trade deals

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with other countries.” Consequently, there will be no reduction in the demand for vets going forward.

25. A consistent supply of qualified vets will be necessary to maintain these standards. In the short to medium term, it will be impossible to meet this demand with UK nationals. Any increase in UK veterinary students may be a long term and gradual position but as a substantial solution there is a significant risk that this will leave the profession with an acute workforce shortage in the short term.

Meeting demand domestically
26. As can be seen above, the UK has relied on the contributions of non-UK EU vets. After Brexit, there will be consideration given to how this demand could be met domestically - both by educating new veterinary surgeons and by ensuring greater retention of the exiting workforce.

Education
27. Across the UK steps have been taken to expand capacity within veterinary education. In part, these additional numbers have been facilitated by new universities initiating veterinary science courses. The University of Nottingham officially opened the School of Veterinary Medicine and Science in April 2007, the first purpose-built new veterinary school to be opened in the UK in 50 years. The University of Surrey opened its School of Veterinary Medicine in October 2015.

28. There are concerns about how quickly the capacity of UK universities could be further expanded to meet a massively increased demand at short notice. Increasing capacity takes time, money (both initial capital and ongoing revenue), and personnel. The University of Surrey announced plans to open the school of veterinary medicine in October 2012; the first cohort of students will not graduate until 2019. At present, the course is not approved for RCVS membership purposes and this will be the case until 2019 when the first students complete their training. RCVS accreditation is not guaranteed. The Surrey veterinary school cost £45 million to establish.

29. Additional resource will be needed to expand capacity within UK veterinary schools. The current cost of veterinary courses is estimated at £20,000 per student per annum. This is more than the £9,000 covered by student fee plus the current

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13 Veterinary Schools Council, Maintaining excellence and sustainability in UK veterinary education and research post-Brexit <http://www.vetschoolscouncil.ac.uk/wp-content/uploads/2017/05/Veterinary-education-research-post-Brexit-VSC.pdf> (Source: Adapted from
support provided by the Higher Funding Council for England (HEFCE) and devolved administrations.

30. Further, UK students are currently subsidised by the higher fees of overseas students; a re-balancing in favour of producing more domestic graduates would therefore jeopardise the funding model of some veterinary schools. Veterinary undergraduate courses are more reliant on international students than undergraduate courses generally, with more drawn from third countries (19.2%) than the EU (2.4%). 14 The figures for all undergraduate courses are lower with 14% being international students (5% EU and 9% are non-EU). 15

31. The veterinary students from third countries who are educated in the UK, at present are qualified to practise in the UK but are often unable to stay because of visa restrictions. Accommodating these graduates within a post-Brexit immigration policy would assist with alleviating an impending workforce shortage. It would also allow graduates who have contributed to UK economy and wider society to continue to do so.

32. However, an increase in domestically trained vets will not necessarily translate into vets who will easily substitute for the non-UK EU vets we may lose access to. In part this is because, though UK students are taught public health to a high standard, UK graduates rarely choose to pursue OV work alone as a career.

Retention of existing workforce

33. BVA and RCVS have expended considerable time, effort and resource to retain graduates within the profession. Together, we launched the report Vet Futures – Taking charge of our future in November 2015. 16 The Vet Futures project aims to improve retention of the existing veterinary workforce by ensuring veterinary professionals are confident, resilient, healthy and well supported, and benefit from exceptional leadership. In July 2016, the Vet Futures Action Plan, 17 was launched with a series of actions to make this vision a reality. These actions are ongoing.

34. Whilst retention has been recognised as a pre-Brexit problem it has been exacerbated since the referendum due to uncertainty about ongoing rights to employment. Considering the projected demand for vets, it is impossible for this to be met in the short term domestically.

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14 Figures provided by RCVS
15 HESA data 2015/16
16 BVA, RCVS Vet Futures – Taking charge of our future, 2015
   <https://www.vetfutures.org.uk/download/reports/Vet%20Futures%20report.pdf>
   <https://www.vetfutures.org.uk/download/publications/vet%20futures%20report%202016(5).pdf>
Our Calls

35. At present, non-UK EU vets are faced with considerable uncertainty about their futures. The publication of the joint report on progress in phase 1 of the Brexit negotiations has provided some clarity on the way forward.\textsuperscript{18} We now call upon the UK Government to bring forward legislation that will give legal effect to this agreement and guarantee working rights for non-British EU vets and veterinary nurses currently working and studying in the UK.

36. In 2011, the veterinary profession was removed from the Home Office Shortage Occupation List because the Migration Advisory Committee made an assessment that there were sufficient veterinary surgeons to meet demand. However, this move did not anticipate the possible loss of non-UK EU graduates from the veterinary workforce. Therefore, we call for vets to be immediately restored to the Shortage Occupation List.

37. A future immigration system must prioritise the veterinary profession. The Government should consider the economic and social impact the profession has, beyond its relatively small size. To ensure animal health and welfare; food safety and public health and the facilitation of trade which requires veterinary certification.

38. Due regard should be given to the specific needs of the veterinary profession. Most veterinary practices are SMEs and as such will have limited capacity and human resources expertise. Vets have no overarching body, such as the NHS for doctors, that will be well placed to meet these exacting administrative demands. Any future immigration system for EU citizens must not place additional administrative or fiscal burdens on veterinary practices.

39. The veterinary students from third countries who are educated in the UK, at present are qualified to practise in the UK but are often unable to stay because of visa restrictions. Accommodating these graduates within a post-Brexit immigration policy would assist with alleviating an impending workforce shortage. It would also allow graduates who have contributed to UK economy and wider society to continue to do so.

26 February 2018

\textsuperscript{18} European Commission and UK Government, \textit{Joint report from the negotiators of the European Union and the United Kingdom Government on progress during phase 1 of negotiations under Article 50 TEU on the United Kingdom’s orderly withdrawal from the European Union}, 2017