BVA AND SPVS RESPONSE TO CHARITY COMMISSION CONSULTATION ON A SCHEME TO CHANGE THE OBJECT OF THE PDSA

Introduction

1. The British Veterinary Association (BVA) and our specialist division Society of Practising Veterinary Surgeons (SPVS) welcome the opportunity to provide a joint response to the Charity Commission’s consultation on a draft scheme for a Parliamentary Order to widen the object of the People’s Dispensary for Sick Animals (PDSA).

2. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and has over 14,000 members. Its primary aim is to protect and promote the interests of the veterinary profession in this country, and it therefore takes a keen interest in all issues affecting the veterinary profession.

3. SPVS helps and supports veterinary surgeons working in veterinary practice. It promotes high standards in business management, client care, animal welfare and ethics, as well as providing advice, information, training and business support for veterinary surgeons and practice staff, and lobbying on behalf of its members when appropriate.

BVA and SPVS comments on the proposed scheme

4. We obviously support initiatives which will improve animal welfare. However, as organisations representing the veterinary profession, we also need to bear in mind and stand up for the well-being and security of private veterinary surgeons earning a livelihood from their profession.

5. Broadly speaking, we consider there is a risk of an impact on the business of vets, if PDSA expands its role. The changes would allow PDSA freedom to charge reduced rates for services and therefore PDSA could infringe on the work of commercial veterinary practices.

6. For instance, private practices often offer neutering at reduced prices to charity organisations, in order to introduce themselves to potential new clients. Should PDSA offer neutering, as well as treatment for sick-animals, then many clients will be lost from private practices in the vicinity of PDSA clinics.

7. By charging for some of its services, PDSA would then be potentially competing with local veterinary practices, which would seem to be at odds with its charitable status. It would be helpful if clear parameters could be set out as to how PDSA will operate in relation to veterinary practices and how their role or objectives might differ.
8. We would query whether PDSA would pay VAT on these services and charge a ‘full’ price. If VAT will not be charged then this would distort the market and give an unfair advantage to PDSA over local veterinary practices.

9. We also have concerns as to exactly how the inability to pay vet's fees would be assessed. Would it be based on the owner’s word or would there be some form of check required? There may also be the risk that this additional safety net could encourage irresponsible pet ownership.

10. Would it be possible, instead, to meet the aims of the PDSA by increasing the availability of vouchers to support more low income clients that have to attend a private practice due to geographical or travel limitations? This would have the advantage of supporting low income clients and not competing with local vets, and strengthening the relationship between private practice and the charitable sector.

11. We note from the explanatory note to the draft Statutory Instrument, that no impact assessment has been produced, as no adverse impact on the private sector is foreseen. However, as explained above, we believe there is the potential for an adverse impact on private veterinary practice. Therefore we are calling for an impact assessment to be published to help clarify what effect the changes are anticipated to have. A draft Statutory Instrument is not sufficient to be able to evaluate the outcome of the proposed changes.
5 September 2014

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Since the submission of our joint response to the charity commission we have held a meeting at BVA with Richard Hooker representing the PDSA who wished to offer further clarification about the planned changes and to respond to our concerns. We have also shared the outcome of that meeting with SPVS council.

BVA and SPVS are satisfied that the PDSA’s intentions with this change of object are sound and well intentioned.
Improved availability of veterinary care and the dissemination of educational material to those genuinely in need is supported by both BVA and SPVS.

Amongst the practicing arm of the profession as represented by SPVS there remain some members who are concerned about the degree to which these changes might impact existing veterinary practices who currently provide services to clients who will come into PDSA’s broadened eligibility categories.