

## Migration Advisory Committee: Call for evidence

### Shortage Occupation List review 2018

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the UK with over 18,000 members. BVA represents, supports and champions the interests of the veterinary profession in this country and we therefore take a keen interest in all issues affecting the profession.
2. The Royal College of Veterinary Surgeons (RCVS) is the statutory regulator for veterinary surgeons, responsible for the registration of veterinary surgeons and veterinary nurses in the UK, and sets, upholds and advances their educational, ethical and clinical standards.
3. We are grateful for the opportunity submit a joint response to this call for evidence.

#### Introduction

4. The veterinary profession is relatively small, with around 25,500 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. Almost half of the veterinary surgeons who register in the UK each year qualified elsewhere in the European Union. In some sectors, such as the meat industry, over 90% of veterinary surgeons are EU nationals.
5. Veterinary surgeons work across the economy, allowing strategically important sectors to operate successfully - this would be impossible without the contribution of 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.”<sup>1</sup>
6. We therefore jointly ask that the UK immigration system delivers on the Prime Minister’s stated priority. Placing veterinary surgeons on the Shortage Occupation List is key to achieving this aim.

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<sup>1</sup> Government Response to the House of Lords European Union Committee Report on Brexit: Farm Animal Welfare <http://www.parliament.uk/documents/lords-committees/eu-energy-environment-subcommittee/Brexit-farm-animal-welfare/Gov-Brexit-farm-anim.pdf>

**What do you think are the main reasons for job shortages (answered in the question above), and or wider shortages in the sector(s)? (Not to exceed 500 words).**

7. Growth in the veterinary sector is estimated at 5% per annum, and double that figure for specialist referrals.<sup>2</sup> Meeting this demand requires steady continued growth in the size of the veterinary workforce.
8. Demographic and generational factors have affected the veterinary workforce in recent decades. Alongside wider shifts in working practices, these changes have led to part-time workers constituting a greater share of the total veterinary workforce (28%).<sup>3</sup> This is particularly acute amongst vets working in clinical practice (21% in 2014 rising to 29% in 2018). There is also growing popularity for portfolio-working; with vets working in clinical practice increasingly doing locum work (8% in 2014 rising to 14% in 2018). These trends are consistent with many professions, including human medicine.<sup>4</sup> Moreover, the veterinary sector faces a relatively low retention rate, with many veterinary surgeons leaving practice early in their careers. A combination of these factors has led to veterinary recruitment struggling to match demand.
9. Demand for veterinary surgeons will increase because of the UK exiting from the EU. Nigel Gibbens, then the UK Chief Veterinary Officer, estimated that the volume of products requiring veterinary export health certification could increase by up to 325% in the case of no deal being reached between the EU and UK.<sup>5</sup> If a deal is agreed, at the end of the implementation period “a UK exporter of an animal product to the EU will need to have an Export Health Certificate (EHC) alongside the consignment.”<sup>6</sup> It is essential that an appropriate number of veterinary surgeons can be recruited, from the EU post-Brexit or from outside the EU, to ensure that essential veterinary work continues, and UK produce of animal origin can continue to be exported.
10. Before the EU referendum, UK veterinary practices reported difficulties recruiting. This problem has intensified following the Brexit vote, as non-UK EU vets have faced considerable uncertainty about their futures. The Major Employers Group which represents some of the largest UK veterinary businesses providing primary care directly to the public, conducted a

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<sup>2</sup> Pets at Home September 2018 Investor Update

<sup>3</sup> BVA spring 2018 Voice Survey

<sup>4</sup> The Kings Fund, Through the eyes of GP trainees: workforce of the future, 2018

<sup>5</sup> Speaking at Official Veterinarian Conference 2017, reported <https://www.vettimes.co.uk/news/non-uk-vets-essential-after-brexit-says-cvo/>

<sup>6</sup> HM Government, Explainer for the agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union November 2018

survey of vacancy rates amongst its members in July 2017. This found an average workforce shortage of approximately 11% for veterinary surgeons and 5.6% for veterinary nursing.

11. A subsequent survey was conducted in November 2018 and showed 890 vacancies in member practices employing over 7700 veterinary surgeons, representing a veterinary workforce shortage of approximately 11.5%. A survey of veterinary nursing vacancies 475 vacancies in practices employing over 6200 veterinary nurses representing a shortage of approximately 7.6%.
12. Therefore, we ask that the veterinary profession is restored to the Shortage Occupation List.

**Please explain what measures have been taken to reduce shortages in the sector as informed by your members and or research. (Not to exceed 500 words).**

#### Education

13. The UK has taken steps in recent years to expand capacity within veterinary education. In part, additional capacity has been facilitated by new universities initiating veterinary science courses. In 2007, the University of Nottingham officially opened the first purpose-built new veterinary school in the UK in 50 years. The University of Surrey started taking vet students in October 2014.
14. There are concerns about how quickly the capacity of UK universities could be further expanded at short notice. Increasing capacity takes time, money (capital and revenue) and personnel. Additionally, capacity is required in veterinary practices for vet students to undertake Extra Mural Studies. The University of Surrey announced plans to open a vet school in October 2012;<sup>7</sup> the first cohort of students will graduate in 2019. The course is not yet approved for RCVS membership purposes, and this will be the case until the first students complete the 5-year course and the RCVS undertakes a successful accreditation visit. The Surrey veterinary school cost £45 million to establish.
15. The Veterinary degree is one of the most expensive degrees to deliver, and veterinary schools usually have to subsidise their graduates from other sources of income; this is a disincentive to the growth of veterinary graduate numbers. EU veterinary surgeons also make up a significant proportion of teaching staff; therefore, the expansion of veterinary schools is also reliant on immigration.

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<sup>7</sup> University of Surrey, *New Veterinary School plans to embrace links between human and animal health*  
Thursday 25 October 2012  
<[https://www.surrey.ac.uk/mediacentre/press/2012/92737\\_new\\_veterinary\\_school\\_plans\\_to\\_embrace\\_links\\_between\\_human\\_and\\_animal\\_health.htm](https://www.surrey.ac.uk/mediacentre/press/2012/92737_new_veterinary_school_plans_to_embrace_links_between_human_and_animal_health.htm)>

16. Veterinary schools recruit from a finite pool of potential graduates and face increasing competition as other professions also seek to increase the number of home-grown graduates.
17. UK graduates favour clinical practice over public health roles. Overseas-qualified veterinary surgeons have shown more inclination towards public health. Significant effort, money and time would be required to change this culture and reduce the reliance on EU nationals.

#### Retention of existing workforce

18. Erosion of the veterinary workforce has been an ongoing concern for BVA, RCVS and Government, which predates the decision of the UK to leave the EU.
19. BVA and RCVS have expended considerable time, effort and resource addressing this problem. Together, we launched the report *Vet Futures – Taking charge of our future*<sup>8</sup> in November 2015. 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*,<sup>9</sup> was launched with a series of actions to make this vision a reality. These actions are ongoing, including undertaking research to better understand the profession's retention problem.

#### Allied-professionals

20. Consideration is being given to how the veterinary team can be reformed to allow allied-professionals to take on additional tasks, freeing up veterinary time to undertake roles for which they are best qualified; any such reform needs to be undertaken in a measured way that prioritises animal health, animal welfare, public health, and retains the assurance provided by a veterinary surgeon's signature which facilitates international trade.
21. This work is being undertaken as part of the RCVS Legislation Review, and by the BVA Vet-led Team Working Group. Recommendations for reform will be published in 2019, some of which will require legislative reform before they could be implemented.

#### **Have these measures worked, if not why? (Not to exceed 500 words).**

22. The current veterinary shortage developed recently but predates the decision of the UK to leave the EU. Concerns about veterinary capacity led to the *Vet Futures* programme and a strong commitment from both RCVS as the regulator for the profession and BVA as the representative body to address these issues.

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<sup>8</sup>BVA, RCVS *Vet Futures – Taking charge of our future*, 2015  
<<https://www.vetfutures.org.uk/download/reports/Vet%20Futures%20report.pdf>>

<sup>9</sup> BVA, RCVS *Vet Futures Action Plan 2016-2020*, 2016  
<[https://www.vetfutures.org.uk/download/publications/vet%20futures%20report%202016\(5\).pdf](https://www.vetfutures.org.uk/download/publications/vet%20futures%20report%202016(5).pdf)>

23. Through a programme of research, engagement with the profession and the public, and a consideration of strategic issues that have affected the profession overseas and other comparable sectors, BVA and RCVS developed an action plan to deliver the best for animal health and welfare, the public and the profession. The project was launched at the BVA Congress at the London Vet Show on 20 November 2014, and a report was published at the next year's event on 20 November 2015. During 2016, an Action Group developed an Action Plan based on the recommendations published in 2015. We have now set up various working groups to deliver these actions. Oversight is carried out by the Vet Futures Project Board, which includes the Presidents, Vice-Presidents, CEOs and communications directors of both RCVS and BVA.
24. The report and measures to address it, while comprehensive, remain at an early stage. We are working to develop a better understanding of the problem. As part of the Vet Futures project, BVA led on a veterinary workforce study, working with Professor of Social and Organisational Psychology Michelle Ryan and colleagues at the University of Exeter. The first joint report, Motivation, Satisfaction, and Retention: Understanding the importance of vets' day-to-day work experiences<sup>10</sup> and a follow-up study with employers, investigating the existence of gender discrimination in the profession were launched in 2018.<sup>11</sup>
25. The decision of the UK to leave the EU means the increase in UK domestic graduate numbers will no longer be coupled with the UK's continued ability to recruit EU-qualified veterinary surgeons. Therefore, there will no longer be sufficient workforce to keep up with demand whilst the longer-term issues are addressed systematically.
26. Whilst retention has been recognised as a pre-Brexit problem it has been exacerbated since the referendum due to uncertainty about ongoing rights to reside and work in the UK. Considering the projected demand for vets, it is impossible for this to be met in the short term domestically. There will be an ongoing need to meet the demand for veterinary professional from outside the UK.

**Are the jobs that you have said are in shortage, open to eligible workers from the Tier 2 points-based visa system?**

27. Yes

**If known, how many workers from outside of the UK have been recruited using the Tier 2 points-based visa system in the past 12 months, stating the job titles. (Not to exceed 500 words).**

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<sup>10</sup> Motivation, satisfaction, and retention Understanding the importance of vets' day-to-day work experiences

<sup>11</sup> Gender discrimination in the veterinary profession A brief report of the BVA Employers' Study 2018

28. The RCVS does not hold the figures for Tier 2 visa applications for veterinary surgeons. However, in 2018 a total of 262 veterinary surgeons registered with non-EU/EEA nationality, and these registrants are in the category most likely to require a Tier 2 visa.
29. It is likely that additional registrants would have sought to come to the UK via this route had the Tier 2 cap not been exceeded.
30. The government has indicated that once the UK leaves the European Union there will no longer be different arrangements for EU and non-EU immigrants. Given the UK's reliance on EU-qualified vets, with approaching 1000 such vets registering each year, it is reasonable to expect that the UK's reliance on Tier 2 visas will increase greatly in future.

**If you have supporting evidence such as survey results from members please attach here. Please remember to omit sensitive details before attaching.**

- RCVS Brexit survey <https://www.rcvs.org.uk/document-library/european-veterinary-surgeons-working-in-the-uk-the-impact-of/>
- BVA Voice Survey data
- Motivation, satisfaction, and retention Understanding the importance of vets' day-to-day work experiences
- Gender discrimination in the veterinary profession A brief report of the BVA Employers' Study 2018

**If you have any other information that might be useful for our call for evidence please use the space below to explain (Not to exceed 500 words).**

#### Our calls

31. 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, 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 many veterinary practices as small businesses unable to meet the demands of an onerous visa-based system.

32. 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.
  
  33. In addition, we recommend that veterinary employers be exempt from the Immigration Skills Charge in order to avoid any additional barriers or burdens to veterinary employment. This is particularly important due to the composition of the veterinary industry, which still includes many small businesses which would struggle with the cost and administration related to the Charge.
  
  34. We further recommend that there is no minimum earning cap for veterinary surgeons applying for working visas. Veterinary surgeons are skilled professionals who may choose to work in the UK for reasons other than remuneration. Further, veterinary surgeons make a significant contribution to society through their work in public health, securing animal health and welfare, and facilitating trade through the role in certification; these are national goods that cannot be assessed in terms of individual contributions to the exchequer.
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