

VETERINARY SERVICES FOR HOUSEHOLD PETS MARKET INVESTIGATION PROPOSED UNDERTAKINGS – CONSULTATION

The Veterinary Services Market Investigation Royal College of Veterinary Surgeons Undertakings 2026

Background

1. On 23 May 2024, following a market review launched on 7 September 2023 and a consultation opened on 12 March 2024, the Competition and Markets Authority (the **CMA**), in exercise of its powers under sections 131 and 133 of the Enterprise Act 2002 (the **Act**), made a reference for a market investigation in relation to the supply of Veterinary Services for Household Pets in the United Kingdom.
2. On 23 May 2024, the CMA appointed from its panel a group of five independent members (the **Group**) to conduct the market investigation and publish a final report. The Group was required to decide whether any feature, or combination of features, of each relevant market prevents, restricts or distorts competition and thereby has an adverse effect on competition (**AEC**) and, if so, what action should be taken.
3. On 24 March 2026 the CMA published its report on the market investigation (the **Final Report**) in which it concluded that there are certain features which have an AEC in the markets for (i) the retail supply of Veterinary Services for Household Pets by first opinion practices (**FOPs**) in the UK, and (ii) the supply of outsourced out-of-hours (**OOH**) provision to FOPs in the UK.
4. The Group decided that, in order to address the AEC and resulting customer detriment, an integrated package of remedies should be imposed consisting of:
 - (a) Measures to empower Pet Owners when making choices, relating to:
 - (i) Transparency of the ownership of Veterinary Businesses
 - (ii) The ability to compare FOPs directly
 - (iii) Better pricing information when choosing treatments and services
 - (iv) Increased awareness of the ability to purchase medicines online and potential savings
 - (v) Clear information on end-of-life services

- (b) Measures to remove barriers to engagement and competition, relating to:
 - (i) Ensuring that vets are able to act in accordance with the relevant provisions of the Royal College of Veterinary Surgeons (**RCVS**) Code and Guidance
 - (ii) Making it easier for Pet Owners to get and use a written prescription
 - (iii) Improving consumer complaints and redress mechanisms
 - (iv) Making it easier for FOPs to switch OOH provider
 - (c) A recommendation to government on reform of the existing statutory regime for the regulation of Veterinary Services
 - (d) Recommendations to the RCVS and the Veterinary Medicines Directorate (**VMD**).
5. Since the publication of the Final Report, two members of the Group have ceased to be members of it. One Group member's appointment to the CMA panel ended on 1 April 2026, and another resigned from the Group on 24 April 2026. Each cessation of membership of the Group, and the Group's continued functioning with its remaining members thereafter, is in accordance with Schedule 4 to the Enterprise and Regulatory Reform Act 2013.
6. On 21 July 2026, in accordance with section 165 of, and paragraph 2(1)(a) of Schedule 10 to, the Act, the CMA published a Notice of its proposal to accept these Undertakings as part of a package of remedies to remedy, mitigate or prevent the AEC and any resulting customer detriment, which it had identified in the Final Report.
7. The package of remedies will be implemented by:
- (a) the Veterinary Services Market Investigation Order 2026 (the **Substantive Order**);
 - (b) a separate Order requiring Veterinary Businesses to provide funding for activities the RCVS will perform in relation to the remedies package (the Veterinary Services Market Investigation (Funding) Order 2026) (**the Funding Order**);
 - (c) these undertakings entered into by the RCVS relating to the activities the RCVS will perform as required of it by the CMA's decisions in the Final Report (**the Substantive RCVS Undertakings**);
 - (d) the Veterinary Services Market Investigation (Funding) Undertakings 2026 setting out how the RCVS will estimate the costs of performing activities required of it by the CMA's decisions in the Final Report and collect funds to cover those costs (**the RCVS Funding Undertakings**); and

- (e) recommendations to government, the RCVS and the VMD as set out in the Final Report (the **Recommendations**).

Undertakings

1. Commencement

- 1.1 In accordance with section 159(3) of the Act, these Undertakings come into force on [Date of acceptance], that being the date when they were accepted by the CMA.

2. Interpretation

- 2.1 In these Undertakings:

‘Act’ means the Enterprise Act 2002

‘Actionable Complaint’ means a complaint which a Veterinary Business has been unable to resolve during the normal course of business within five Working Days of it being made to the business. An Actionable Complaint must be made to a Veterinary Business within 12 months of: (i) the date the matter complained of occurred or (ii) the Pet Owner became aware of the matters that are the subject of the complaint, whichever is later.

‘ADR Regulations’ means the Alternative Dispute Resolution for Consumer Disputes Regulations 2015.

‘Alternative Dispute Resolution’ and **‘ADR’** refer to ways of resolving disputes between consumers and traders that do not involve court proceedings.

‘Attestations’ means the attestations Veterinary Businesses are required to make under Part 8 of the Substantive Order to confirm whether they are compliant with the obligations which apply to them.

‘Commencement Day’ means the day on which these Undertakings are accepted by the CMA, being [*specific date to be inserted*].

‘CMA’ means the Competition and Markets Authority.

‘DMCCA’ means the Digital Markets, Competition and Consumers Act 2024.

‘Fee Caps’ means the Primary Prescription Fee Cap and the Additional Prescription Fee Cap, as those terms are defined in the Substantive Order.

‘Final Report’ means the final report of the CMA’s market investigation into Veterinary Services for Household Pets in the UK published on 24 March 2026.

‘Find a Vet Platform’ means the online database and search service provided by the RCVS that helps Pet Owners locate veterinary practices in the UK.

‘First Opinion Practice’ and ‘FOP’ mean:

- (a) a site or physical premises at which primary veterinary care for Household Pets, comprising FOP Services and any OOH FOP Services that are provided by the same Veterinary Business as provides the FOP Services, is offered (including where the relevant business offers services as a Limited Service Provider); and
- (b) where it does not do so from a site or physical premises, the set of mobile facilities and equipment a Veterinary Business uses to provide primary veterinary care for Household Pets.

‘FOP Services’ means primary veterinary care and related services provided in a FOP during normal working hours.

‘Guidance’ means the supporting guidance to the RCVS Codes.

‘Household Pet’ and ‘Pet’ mean an animal such as a dog, a cat, a hamster, a gerbil, a mouse or other rodent, and any exotic animal (but not a farm animal or horse) that is kept for companionship or protection and habitually resides in the Pet Owner’s dwelling.

‘Large Relevant Veterinary Businesses’ means a Relevant Veterinary Business operating 15 or more FOPs and/or OOH Centres.

‘Limited Service Provider’ means a practice that offers no more than one service to its clients and includes, but is not limited to, vaccination clinics or neutering clinics, as set out in 3.49 of the Guidance..

‘Monetary Threshold’ means the threshold, expressed in pounds sterling and including VAT, at which the Substantive Order will require Relevant Veterinary Businesses to provide Pet Owners with a written estimate.

‘Monitoring Proposal’ means the document, produced by the RCVS and approved by the CMA (and which may be amended by the RCVS from time to time after reasonable consultation by the RCVS with Relevant Veterinary Businesses and with the CMA’s approval), which sets out how the RCVS will monitor Relevant Veterinary Businesses’ compliance with the Substantive Order.

‘Ongoing Medication’ means a prescribed medication which involves a second (or more) issue of the same medication, to prevent or treat the same condition, without any interruption or gap in the course of the medication.

‘Out-of-hours’ or ‘OOH’ means the period of time outside normal working hours.

‘OOH Centre’ means the site, premises or location at which a Veterinary Business provides OOH Provider Services.

‘OOH FOP Services’ means OOH Services provided in a FOP which are not OOH Provider Services.

‘OOH Provider Services’ means OOH Services provided by a Veterinary Business to a Pet Owner directly or through a subcontracting or outsourcing arrangement with another Veterinary Business, where the provider only provides primary care and related services for Pets outside normal working hours.

‘OOH Services’ means primary veterinary care and related services that are provided outside normal working hours.

‘Pet Owner’ means the legal owner of a Pet or an individual purchasing Veterinary Services for a Pet which is under their care either permanently or temporarily (as distinguished from being ‘under care’ with a veterinary professional).

‘POM-V’ means ‘Prescription-only Medicine – Veterinarian’, which under the Veterinary Medicines Regulations 2013 may be sold to a Pet Owner only in accordance with a prescription from a Veterinary Surgeon for a Pet under the care of the Veterinary Surgeon.

‘RCVS’ means the Royal College of Veterinary Surgeons.

‘RCVS Code(s)’ means the Code of Professional Conduct for Veterinary Surgeons and the Code of Professional Conduct for Veterinary Nurses published by the RCVS.

‘Referral Centre’ means a practice or animal hospital that offers services accessed via a referral from one Veterinary Professional to another and where such referral work forms a substantial part of the practice or animal hospital offering it. Veterinary Professionals at such a practice or hospital may have a particular specialism (for example, specialist imaging, dentistry or complex surgery).

‘Relevant Veterinary Business’ means a Veterinary Business on which an obligation is imposed by the Substantive Order.

‘Small Relevant Veterinary Businesses’ means a Relevant Veterinary Business operating 14 or fewer FOPs and/or OOH Centres.

‘Substantive Order’ means the Veterinary Services Market Investigation Order 2026.

‘Veterinary Business’ means a person (any entity whether it is a legal person like a company, a joint venture or partnership, or an individual) carrying on a business that comprises the retail provision of one or more Veterinary Services to Pet Owners for their Household Pets.

‘Veterinary Nurse’ means a qualified professional who works alongside Veterinary Surgeons to provide medical care and support for animals.

‘Veterinary Professional’ means a Veterinary Surgeon or a Veterinary Nurse.

‘Veterinary Surgeon’ means a qualified professional responsible for diagnosing and treating illnesses and injuries in animals. Their role includes performing surgeries, prescribing medications, advising on preventative care. Veterinary Surgeons are

registered with the RCVS which ensures they meet the required standards of education and practice.

‘Veterinary Services’ means the provision of:

- (a) FOP Services and OOH FOP Services;
- (b) OOH Provider Services;
- (c) laboratory services;
- (d) animal hospital services;
- (e) referral centre services;
- (f) pet cremation services;
- (g) pet care plans; and
- (h) prescribed veterinary medicines.

‘VMD Register of Online Retailers’ means the register, hosted on the Veterinary Medicines Directorate website, of all online pharmacies which are authorised to sell POM-V medication.

‘Working Day’ means any day other than: (a) a Saturday; (b) a Sunday; (c) Christmas Day; (d) Good Friday; (e) a day which is a bank holiday under the Banking and Financial Dealings Act 1971 in the relevant part of the United Kingdom; (f) a day appointed for public thanksgiving or mourning; or (g) only in respect of Northern Ireland, 12 July.

Unless expressly stated or the context requires otherwise, other words and phrases have the same meaning as is given to them in the Final Report and they shall be construed accordingly.

3. RCVS monitoring role

- 3.1 The RCVS shall monitor compliance with the obligations the CMA has imposed on Veterinary Businesses in parts 2, 3, 4, 6 and 7 of the Substantive Order in accordance with the Monitoring Proposal.

Attestations

- 3.2 In accordance with the Monitoring Proposal, the RCVS shall:
- (a) put in place effective mechanisms which allow it to receive Attestations from Relevant Veterinary Businesses, including providing appropriate online platforms for those businesses to submit their Attestations;
 - (b) put in place effective internal procedures to process the Attestations; and

- (c) collect and process the Attestations at the times set out in the Substantive Order.
- 3.3 The RCVS shall monitor Attestations made by the Relevant Veterinary Businesses in relation to their compliance with Parts 2, 3, 4, 6 and 7 of the Substantive Order.

Communicating the findings to the CMA

- 3.4 The RCVS shall, after receiving and processing the Attestations, communicate its findings to the CMA in the time and manner set out in the Monitoring Proposal.

Spot checks

- 3.5 In accordance with the Monitoring Proposal, the RCVS shall carry out spot checks, including examining a sample of Relevant Veterinary Businesses' websites, premises and customer literature, in a sample of cases where its assessment of the risk of non-compliance indicates such a risk, in order to monitor Relevant Veterinary Businesses' compliance with Parts 2, 3, 4, 6 and 7 of the Substantive Order.
- 3.6 The RCVS must provide a Relevant Veterinary Business with reasonable notice prior to carrying out a spot check of the Relevant Veterinary Business's sites, location or premises.
- 3.7 In relation to Part 7 of the Substantive Order, the RCVS shall request complaint processes and complaint logs from a sample of Relevant Veterinary Businesses to assess whether those businesses are compliant with Articles 21 and 22 of the Substantive Order.

Cases of possible non-compliance

- 3.8 Should the RCVS become aware via complaints or reports made to it, or by a Relevant Veterinary Business self-reporting or making an Attestation, of any likely non-compliance with parts 2, 3, 4, 6 and 7 of the Substantive Order it shall take reasonable steps, in accordance with the Monitoring Proposal, to determine whether the Relevant Veterinary Business is non-compliant, and if necessary, resolve any non-compliance in consultation with the Relevant Veterinary Business that may be in breach.
- 3.9 The RCVS shall notify the CMA on a not less than monthly basis of any instances of potential non-compliance by any Relevant Veterinary Business with parts 2, 3, 4, 6 and 7 of the Substantive Order of which it has become aware through the means described in paragraph 3.8.

- 3.10 The notification referred to in paragraph 3.9 shall include the following information:
- (a) contact details of the Relevant Veterinary Business likely in breach of the Substantive Order;
 - (b) a description of the likely breach;
 - (c) a description of the action taken by RCVS to determine whether a Relevant Veterinary Business is in breach, and if necessary resolve the likely breach in consultation with the Relevant Veterinary Business; and
 - (d) where it has the information, a description of any action already taken by the Relevant Veterinary Business to resolve the likely breach.

Compliance reports

- 3.11 The RCVS shall produce and share a compliance report (the Compliance Report) with the CMA in accordance with the Monitoring Proposal. The Compliance Report shall include:
- (a) The overall level of compliance across:
 - (i) all Relevant Veterinary Businesses that are subject to the Substantive Order;
 - (ii) Small Relevant Veterinary Businesses only; and
 - (iii) Large Relevant Veterinary Businesses only.
 - (b) The number of cases of non-compliance, split by:
 - (i) those resolved by the RCVS in consultation with the Relevant Veterinary Business and those which have not been so resolved; and
 - (ii) minor or technical and serious or repeated breaches (in accordance with guidance provided by the CMA).
 - (c) The level of compliance by all Relevant Veterinary Businesses, Small Relevant Veterinary Businesses and Large Relevant Veterinary Businesses, respectively, year on year.
 - (d) A qualitative assessment of:
 - (i) recurring compliance issues;
 - (ii) the effectiveness of the Monitoring Proposal and the action the RCVS has taken to resolve likely breaches of the Substantive Order with Relevant Veterinary Businesses; and

- (iii) action the RCVS and the CMA should take to encourage compliance with the Substantive Order and to increase the effectiveness of the monitoring of the Substantive Order.

4. Pet Owner Empowerment

Find a Vet

- 4.1 The RCVS shall set up and maintain a web form or, subject to their approval and implementation by the RCVS, alternative means of provision, which Relevant Veterinary Businesses will be required to complete with the information required under Article 10 of the Substantive Order (the Find a Vet Information). This web form (or any alternative means of provision) must include a data input template to create specific data fields and capture the data which Relevant Veterinary Businesses can use to provide the required information to the RCVS. The RCVS shall take reasonable steps to notify Relevant Veterinary Businesses that it has implemented the undertakings contained in this paragraph within 10 days of its doing so.
- 4.2 The RCVS shall provide reasonable user support for Relevant Veterinary Businesses in meeting their obligations to submit the Find a Vet Information to the RCVS, including creating guidance for completing the web form (or alternative means).
- 4.3 The RCVS shall process the Find a Vet Information in an efficient and secure manner.
- 4.4 The RCVS shall make the Find a Vet Information publicly available on the Find a Vet Platform in an accessible and user-friendly manner, ensuring that the Find a Vet Information is made available on the Find a Vet Platform as soon as reasonably practicable following the RCVS's receipt of such information from Relevant Veterinary Businesses.
- 4.5 Before making the Find a Vet Information publicly available on the Find a Vet Platform, the RCVS shall carry out user testing on the design and functionality of the Find a Vet Platform, and shall consult with Relevant Veterinary Businesses as it considers appropriate and take reasonable account of representations received in response to such consultation.
- 4.6 The RCVS shall review the Find a Vet Platform and adapt and enhance it as appropriate to ensure users can navigate the Find a Vet Information effectively. Such adaptations and enhancements to the front-end functionalities of the Find a Vet Platform shall include, but may not be limited to:
 - (a) directly displaying, in an accessible format, all the Find a Vet Information in relation to each FOP, OOH Centre and Referral Centre operated by

Relevant Veterinary Businesses, including public URLs of the web pages on which the businesses operating those FOPs, OOH Centres and Referral Centres have published the same information; and

- (b) the ability to filter and sort search results by key data fields, including location, Pet characteristics, practice characteristics, service provision and price.

4.7 The RCVS shall produce criteria (the Sharing Criteria) that third parties must meet in order to be eligible to access the Find a Vet Information provided to the RCVS by Relevant Veterinary Businesses and processed by the RCVS for inclusion on the Find a Vet Platform (the Processed Find a Vet Data). The Sharing Criteria must:

- (a) contain standards of security, reliability, accuracy, transparency and support fair competition;
- (b) stipulate that no third party can use the Find a Vet Information or Processed Find a Vet Data for any paid or promoted ranking process, service or application; and
- (c) provide for an access approval process administered and determined by the RCVS, including a process for appeals of the RCVS's decisions to the CMA.

4.8 The RCVS shall consult Relevant Veterinary Businesses and other relevant stakeholders on the Sharing Criteria as it considers appropriate and take reasonable account of representations received in response to any such consultation.

4.9 The RCVS shall submit the Sharing Criteria to the CMA for approval. The CMA's approval will not be unreasonably withheld.

4.10 The RCVS shall implement the undertakings contained in paragraphs 4.1 – 4.9 within nine months of the Commencement Day.

4.11 The RCVS shall share the Find a Vet Information and the Processed Find a Vet Data only with third parties which meet the CMA approved Sharing Criteria (the Approved Third Parties). RCVS shall only share the Find a Vet Information and the Processed Find a Vet Data with a third party subject to a binding agreement with that third party requiring ongoing compliance with the Sharing Criteria. Where the RCVS becomes aware that an Approved Third Party has materially breached the Sharing Criteria it shall immediately stop sharing the Find a Vet Information and the Processed Find a Vet Data with the Approved Third Party and withdraw the Approved Third Party's approval to use the Find a Vet Information and the Processed Find a Vet Data.

- 4.12 The RCVS shall develop or commission a technical solution to enable the Find a Vet Information and Processed Find a Vet Data to be shared with Approved Third Parties. The technical solution shall include one or more of the following:
- (a) a secure API that allows Approved Third Parties to request the Find a Vet Information and the Processed Find a Vet Data;
 - (b) the ability to generate regular data extracts and share them via secure channels;
 - (c) the ability to share live datasets with Approved Third Parties through governed access controls on data platforms; and
 - (d) the provision of data through any existing channels or infrastructure that the RCVS already manages or maintains.
- 4.13 The RCVS shall implement the undertakings contained in paragraphs 4.11-4.12 within twelve months of the Commencement Day.

5. Choice of Treatments, Referrals and Diagnostics

Publication of Monetary Threshold

- 5.1 From the Commencement Day until the CMA updates the Monetary Threshold, the Monetary Threshold is £500.
- 5.2 Within eight months of the Commencement Day, the RCVS shall publish on its website the level of Monetary Threshold.
- 5.3 The Monetary Threshold will be reviewed annually by the CMA and any adjustment to the Monetary Threshold and the date from which that adjustment is to apply will be communicated in writing by the CMA to the RCVS.
- 5.4 The RCVS shall publish on its website any updated Monetary Threshold including the date from which it is to apply as soon as possible and no later than five Working Days of the updated Monetary Threshold being communicated by the CMA to the RCVS.

6. Veterinary Medicines

Standard literature on the written prescription process

- 6.1 The RCVS shall develop the contents of and produce literature informing Pet Owners about the written prescription process (the RCVS Written Prescription Literature). The RCVS Written Prescription Literature shall include:
- (a) information about Pet Owners' ability to request a written prescription;

- (b) an overview of the written prescription process, including a simple walk through of the process of requesting and receiving a written prescription and having that prescription fulfilled;
 - (c) the level of the Fee Caps and information on how often they may be charged;
 - (d) information on the types of places that fulfil veterinary prescriptions;
 - (e) a statement that an authorised online pharmacy is one that is authorised by the VMD in accordance with statutory requirements; and
 - (f) a link to the VMD Register of Online Retailers.
- 6.2 The RCVS shall make the RCVS Written Prescription Literature available to Relevant Veterinary Businesses by email in a format which enables those businesses to:
- (a) print a physical copy in leaflet form; and
 - (b) host a digital version of the Written Prescription Literature on their websites.
- 6.3 The RCVS shall host the RCVS Written Prescription Literature on its own website.
- 6.4 The RCVS shall update the information in the RCVS Written Prescription Literature from time to time as necessary for the information it contains to remain accurate (including when any of the Fee Caps is updated by the CMA). The RCVS shall share any updated RCVS Written Prescription Literature in accordance with paragraphs 6.2 – 6.3 of these Undertakings as soon as reasonably possible after any such update. In the case of an update to the Fee Caps, the RCVS shall do so at least five Working Days before such updated fees come into force.
- 6.5 The RCVS shall implement the undertakings in paragraphs 6.1 – 6.4 within eight months of the Commencement Day.

Standard Written Prescription Notice

- 6.6 The RCVS shall publish and distribute a standard notice to publicise to Pet Owners their ability to request a written prescription from their FOP and the potential benefits of purchasing medicines online or from third party retailers (a Standard Written Prescription Notice). The Standard Written Prescription Notice shall be for distribution to all Relevant Veterinary Businesses.
- 6.7 The contents of the Standard Written Prescription Notice will be provided by the CMA to the RCVS and may be updated by the CMA from time to time, where it gives the RCVS reasonable notice, in order that the contents remain accurate.

- 6.8 The RCVS shall make the Standard Written Prescription Notice available to Relevant Veterinary Businesses in a format which enables those businesses to:
- (a) edit the written prescription fee figure so that it remains accurate; and
 - (b) print a physical copy.
- 6.9 The RCVS shall host a copy of the Standard Written Prescription Notice on its own website and distribute it to Relevant Veterinary Businesses by email.
- 6.10 The RCVS shall share any updated version of the Standard Written Prescription Notice, in accordance with paragraphs 6.8-6.9 of these Undertakings, within 10 Working Days of the updated contents being provided to the RCVS.
- 6.11 The RCVS shall implement the undertakings in paragraphs 6.6 – 6.10 within eight months of the Commencement Day.

Standard Flyer for Ongoing Medication

- 6.12 The RCVS shall publish and distribute a standard flyer for Pet Owners whose Pets are prescribed Ongoing Medication (a Standard Flyer for Ongoing Medication). The Standard Flyer for Ongoing Medication shall be for distribution to all Relevant Veterinary Businesses.
- 6.13 The contents of the Standard Flyer for Ongoing Medication will be provided by the CMA to the RCVS and may be updated by the CMA from time to time, where it gives the RCVS reasonable notice, in order that the contents remain accurate.
- 6.14 The RCVS shall make the Standard Flyer for Ongoing Medication available to Relevant Veterinary Businesses in a format which enables those businesses to:
- (c) print a physical copy; and
 - (d) email a copy to Pet Owners.
- 6.15 The RCVS shall host a copy of the Standard Flyer for Ongoing Medication on its own website and distribute it to Relevant Veterinary Businesses by email.
- 6.16 The RCVS shall share any updated version of the Standard Flyer for Ongoing Medication, in accordance with paragraphs 6.14-6.15 of these Undertakings, within 10 Working Days of the updated contents being provided to the RCVS.
- 6.17 The RCVS shall implement the undertakings in paragraphs 6.12 – 6.16 within eight months of the Commencement Day.

7. Complaints and Redress

Decision Tree

- 7.1 The RCVS will produce a decision tree which sets out Pet Owners' routes to redress, which will include consumer friendly explainers of the Pet Owners' options when they want to raise a complaint (the Decision Tree).
- 7.2 The Decision Tree will cover:
 - (a) how to raise complaints with Relevant Veterinary Businesses in the first instance and what the Pet Owner should expect from those businesses;
 - (b) the role of ADR, the details of the ADR provider with which the RCVS has contracted in accordance with paragraph 7.10 of these Undertakings and the obligation on Relevant Veterinary Businesses to engage in mediation in good faith;
 - (c) details of the RCVS disciplinary process and how that might be relevant to resolving Pet Owners' complaints; and
 - (d) court proceedings.
- 7.3 For each option in paragraph 7.2(a)-(d), the RCVS will ensure that the language used is accessible to Pet Owners and covers:
 - (a) when, and about what, Pet Owners can pursue that option for seeking resolution and redress;
 - (b) an explanation of the nature of the resolution and redress that option offers and what steps the Pet Owner may take if the complaint is not resolved through that option; and
 - (c) the extent to which that option may involve costs for the Pet Owner.
- 7.4 The RCVS shall consult Relevant Veterinary Businesses, trade associations and other persons, as it considers appropriate, on the Decision Tree and take reasonable account of representations received in response.
- 7.5 The RCVS shall submit the Decision Tree to the CMA for approval. The CMA's approval will not be unreasonably withheld.
- 7.6 The RCVS shall host the Decision Tree on its website.
- 7.7 The RCVS shall publish a digital version of the Decision Tree on the RCVS website in a format which will allow Relevant Veterinary Businesses to download and print the Decision Tree and to host the Decision Tree on their websites.

- 7.8 The RCVS shall maintain and update the Decision Tree including all versions hosted on its website to ensure the information it contains is accurate. The RCVS shall communicate any updates made to the Decision Tree to Relevant Veterinary Businesses by email within five Working Days of such updates being published on its website.
- 7.9 The RCVS shall implement the undertakings in paragraphs 7.1-7.8 within four months of the Commencement Day.

Provision of Mediation

- 7.10 The RCVS shall enter into or maintain a contract with an ADR provider which offers mediation services to Relevant Veterinary Businesses.
- 7.11 The ADR provider which the RCVS contracts with must be:
- (a) approved in line with the ADR Regulations or the DMCCA, as applicable;
 - (b) free at the point of use for Relevant Veterinary Businesses and Pet Owners;
 - (c) required to alert the RCVS where, in the reasonable opinion of the ADR Provider, the Relevant Veterinary Business fails to engage in mediation in good faith; and
 - (d) required to provide the RCVS with the data which the RCVS requires in order to comply with its obligations in paragraphs 7.15-7.19 of these Undertakings.
- 7.12 The ADR provider which the RCVS contracts with must be subject to an obligation to decide whether a complaint raised with it should not be mediated because the complaint is frivolous or vexatious.
- 7.13 The ADR provider which the RCVS contracts with must have an obligation to decide whether to delay the mediation of a complaint raised with it:
- (a) up to a maximum of 12 weeks from the complaint becoming an Actionable Complaint because the Relevant Veterinary Business has written to the Pet Owner within eight weeks of the complaint becoming an Actionable Complaint to explain that more time is needed to investigate the complaint; or
 - (b) until a reasonable time has been allowed for any other investigation of the complaint to conclude.
- 7.14 The RCVS shall implement the undertakings in paragraphs 7.10-7.13 within six months of the Commencement Day.

Collecting, analysing and publishing insights on complaints

- 7.15 The RCVS will collect and analyse data relating to Pet Owner complaints in the market for Veterinary Services for Household Pets from the following sources:
- (a) data provided by the ADR provider with which the RCVS has contracted under paragraph 7.10 of these Undertakings;
 - (b) where it is available, data provided by other ADR providers which Relevant Veterinary Businesses have chosen to use pursuant to Article 21 of the Substantive Order;
 - (c) the complaint logs which Relevant Veterinary Businesses have submitted to the RCVS in accordance with Article 22(2) of the Substantive Order and paragraph 3.7 of these Undertakings; and
 - (d) the RCVS's own records about complaints.
- 7.16 The analysis referred to in paragraph 7.15 will cover:
- (a) trends in complaints, including the number and type of complaints being raised by Pet Owners;
 - (b) the most frequently raised complaints and their underlying causes;
 - (c) outcomes for Pet Owners after making a complaint; and
 - (d) best practice in complaint handling and any need for education on this matter across the sector.
- 7.17 The RCVS will publish on its website, on an annual basis, a report setting out the findings and insights from its analysis about complaints in the veterinary market for Household Pets (the Annual Insights Report).
- 7.18 Any information included in the Annual Insights Report must be anonymised as to the Relevant Veterinary Businesses, Veterinary Professionals and Pet Owners involved.
- 7.19 The RCVS will publish its first Annual Insights Report 24 months after the Commencement Day.

8. Provision of information to the CMA

- 8.1 The RCVS shall provide to the CMA, as soon as reasonably practicable and in any event within a reasonable deadline set by the CMA, such information as the CMA may reasonably require in connection with these Undertakings.
- 8.2 The RCVS shall comply with such reasonable written directions as the CMA may from time to time give and take such steps within its reasonable

competence as may be required for the purpose of carrying out or securing compliance with these Undertakings.

- 8.3 Every two months from the Commencement Day until its first anniversary, the RCVS shall provide the CMA with progress reports detailing what it is doing to comply with these Undertakings and shall, after 12 months from the Commencement Day, provide annual reports within five Working Days of the Commencement Day anniversary confirming the extent of its compliance with these Undertakings and any steps it is taking to secure and maintain compliance.
- 8.4 If the RCVS at any time becomes aware that it is in breach or reasonably likely to be in breach of any provision of these Undertakings, it shall notify the CMA within 14 Working Days to advise the CMA that there has been or is reasonably likely to be a breach by the RCVS and of all the circumstances of that breach within its knowledge and what it is doing to rectify the breach and ensure it is not repeated.

9. Governing law

- 9.1 The RCVS agrees that these Undertakings shall be governed and construed in all respects in accordance with English law.
- 9.2 If any dispute arises concerning these Undertakings, the RCVS shall submit to the courts of England and Wales.

10. Service of Documents

- 10.1 The RCVS authorises its Chief Executive Officer to accept, on its behalf, service by email of all documents connected with these Undertakings. Such service shall be deemed to have been acknowledged by the RCVS if it is acknowledged by its Chief Executive Officer or other nominee appointed by the RCVS.
- 10.2 Any communication from the RCVS to the CMA under these Undertakings shall be addressed to the Remedies Monitoring Team, Competition and Markets Authority, The Cabot, Cabot Square, London E14 4QZ or such other person or address as the CMA may direct in writing and shall include email communication to remediesmonitoringteam@cma.gov.uk or such other address as the CMA may direct in writing.

11. Termination

- 11.1 The RCVS agrees that these Undertakings shall be in force until such time as they are varied, superseded or released under section 159(4) or (5) of the Act.

- 11.2 The RCVS agrees that the variation, supersession or release of these Undertakings shall not affect the validity and enforceability of any rights or obligations that arose prior to such variation, supersession or release.