Which?

A Veterinary Ombudsman

The rationale for an Ombudsman to be established as part of reforms to the Veterinary Surgeons Act

About

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1. Introduction

It is important in any market that consumers have mechanisms to resolve disputes. Without such mechanisms, consumers can be deterred from complaining or denied appropriate redress. This can lead to lower quality goods and services, a loss of trust, and the denial of justice. Dispute mechanisms need to be quick, fair and accessible.[1] Such mechanisms can also benefit businesses, who can avoid lengthy and costly engagement with complainants.

Alternative Dispute Resolution (ADR) encompasses a range of mechanisms that help consumers and businesses resolve disputes without going to court. Depending on the sector, these may include mediation, conciliation, adjudication, arbitration and ombudsman schemes. Although these approaches differ in how they facilitate or determine outcomes, they share the common aim of providing a more accessible, timely and cost-effective route to redress than formal legal proceedings. The veterinary market currently offers a mediation scheme for consumers, called the Vet Client Mediation Service (VCMS), though the scheme is not mandatory for businesses to take part in and it cannot make binding judgements. Our primary research on complaints in the market shows that current provisions for redress are not working for consumers.[2]

In the Final Decision Report of its market investigation into veterinary services, the CMA concluded that redress provision in the market is currently inadequate and recommended to the government that, as part of wider legislative reform in the market, pet owners should have the option to seek a determination from a binding independent redress scheme. The CMA put forward two potential delivery methods by which this could be achieved. The first is the establishment of a new consumer Ombudsman for veterinary services. The second is supplementing the existing mediation service with binding adjudication provided by an independent panel.

Since then, the Department for Environment, Food & Rural Affairs has published its white paper setting out its vision for legislative reform in the veterinary sector. This states their intention to introduce a means of binding redress for consumers, possibly through setting up a veterinary Ombudsman.[3]

This briefing note sets out the need for better access to redress in the sector, argues that the establishment of a veterinary services Ombudsman is the preferable option for delivery of adequate redress, and lays out key factors that need to be considered in the design and implementation of such an ombudsman.

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[1] Which? (2025) Strengthening ADR frameworks: advancing fair and effective consumer dispute resolution, accessed at: https://www.which.co.uk/policy-and-insight/article/strengthening-adr-frameworks-advancing-fair-and-effective-consumer-dispute-resolution-avQkR9B6lvA3

[2] Which? (2025) Complaints and redress in veterinary services, accessed at:https://www.which.co.uk/policy-and-insight/article/complaints-and-redress-in-veterinary-services-a5z611X9tZzf

[3] Defra (2026) Our vision for a thriving veterinary sector, accessed at: https://www.gov.uk/government/publications/our-vision-for-a-thriving-veterinary-sector/our-vision-for-a-thriving-veterinary-sector

2. The need for a better private redress mechanism

The market for veterinary services has features which make it especially important that appropriate dispute mechanisms exist. For example, transactions can be high value (eg surgeries costing thousands of pounds) and involve high stakes for pet owners (the health of a beloved pet). The consequences of detrimental incidents can be very significant. According to the government's most recent consumer detriment survey, 40% of detrimental incidents in veterinary services had a negative effect on the consumer's household finances, and 31% on their mental health.[4] Which?'s research on complaints and redress in the sector has highlighted the devastating effects the most serious complaints can have on pet owners, who reported impacts on their mental and even physical health.[5]

Currently, if a complaint cannot be resolved directly with the vet business, the only Alternative Dispute Resolution available to consumers is the Vet Client Mediation Service. The VCMS is funded by the Royal College of Veterinary Surgeons (RCVS) and has been running since 2017. It can deal with any complaint that does not reach the RCVS threshold of serious professional misconduct. It received more than 3,500 complaints in 2023-24 and invited 1,372 practices to engage in mediation.[6] These figures are despite most consumers with a complaint being deterred from escalating it because they do not believe they will get anywhere or do not know how.[7] The VCMS has a fairly high resolution rate among mediations that were concluded, at 82%.[8]

However, the service has clear limitations and there is ample evidence that the current institutional framework for dispute resolution in the veterinary services market is inadequate. Of the 43 sectors included in the government's 2024 consumer detriment survey, veterinary services has the **third lowest level of positive resolutions to detrimental experiences at just 31%**,[9] and our research revealed high levels of dissatisfaction with complaint handling and outcomes in the sector.[10]

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[4] Department for Business and Trade (2025) Consumer detriment survey 2024, accessed at: https://www.gov.uk/government/publications/consumer-detriment-survey-2024
[5] Which? (2025) Complaints and redress in veterinary services, accessed at: https://www.which.co.uk/policy-and-insight/article/complaints-and-redress-in-veterinary-services-a5z611X9tZzf
[6] 56% of complaints were handled at the preliminary stage and did not proceed to mediation. VCMS (2024) Annual Report 2023-24, accessed at: https://www.vetmediation.co.uk/app/uploads/2025/09/VCMS-Report-for-2023-2024-Final.pdf
[7] Which? (2025) Complaints and redress in veterinary services, accessed at: https://www.which.co.uk/policy-and-insight/article/complaints-and-redress-in-veterinary-services-a5z611X9tZzf
[8] VCMS (2024) Annual Report 2023-24, accessed at: https://www.vetmediation.co.uk/app/uploads/2025/09/VCMS-Report-for-2023-2024-Final.pdf
[9] Department for Business and Trade (2025) Consumer detriment survey 2024, accessed at: https://www.gov.uk/government/publications/consumer-detriment-survey-2024
[10] Which? (2025) Complaints and redress in veterinary services, accessed at: https://www.which.co.uk/policy-and-insight/article/complaints-and-redress-in-veterinary-services-a5z611X9tZzf

One of the limitations is that participation in the service is not mandatory for vet businesses, and 22% of practices declined to engage with mediation when invited.[11] Further, awareness of the service is not as high as it could be. The CMA found that only 5% of pet owners were aware of it,[12] and our research found that more than a third (36%) of pet owners who were dissatisfied with the way their complaint had been handled but who had not escalated the complaint beyond their vet practice said that they didn't know how to escalate it.[13]

To address these issues, the CMA will require all veterinary businesses to participate in mediation and to signpost third-party redress options to pet owners. It will also require the RCVS to develop and publicise a decision tree to help pet owners navigate the different routes to obtaining redress.[14]

However, these measures will not address the fundamental problem that mediation is not always an appropriate mechanism to resolve complaints. By its nature, mediation is a process that facilitates communication between the two parties in a dispute, but there has been widespread criticism that mediation is an inadequate mechanism when there is an imbalance of power between the parties.[15] This is the case in veterinary services where differences in knowledge and experience between vet businesses and pet owners are likely to be substantial. There will be many pet owners who are unable to effectively navigate a mediation process to reach a fair outcome, and this may be even more likely for those with characteristics of vulnerability. Further, in our research into veterinary complaints, we spoke to pet owners for whom their relationship with the practice has broken down to the extent that mediation is not a realistic prospect.[16]

To ensure there are fair outcomes for all parties, especially those who are less able to advocate for themselves, there is a need for a more comprehensive ADR scheme that has appropriate governance, transparency and process, with active investigation and consideration of both sides of a case. Which? therefore strongly supports the CMA's recommendation that a binding independent redress scheme be introduced for the veterinary services sector.

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[11] VCMS (2024) Annual Report 2023-24, accessed at: https://www.vetmediation.co.uk/app/uploads/2025/09/VCMS-Report-for-2023-2024-Final.pdf
[12] CMA (2026) Veterinary Services for Pets Final Decision Report: Part A, accessed at: https://www.gov.uk/government/publications/veterinary-services-for-household-pets-final-decision-report
[13] Which? (2025) Complaints and redress in veterinary services, accessed at: https://www.which.co.uk/policy-and-insight/article/complaints-and-redress-in-veterinary-services-a5z611X9tZzf
[14] CMA (2026) Veterinary Services for Pets Final Decision Report: Part B, accessed at: https://www.gov.uk/government/publications/veterinary-services-for-household-pets-final-decision-report
[15] See, for example, Christopher Hodges (2022) *Outcome-based Cooperation, Chapter 16*.
[16] Which? (2025) Complaints and redress in veterinary services, accessed at: https://www.which.co.uk/policy-and-insight/article/complaints-and-redress-in-veterinary-services-a5z611X9tZzf

3. The benefits of an Ombudsman

The CMA suggests two possible delivery models for a binding independent redress scheme: an ombudsman or supplementing the existing mediation service with binding adjudication provided by an independent panel. Which? considers an ombudsman to be the best option for a redress scheme for the veterinary services sector because:

- it is a model that is recognisable for consumers,
- the inquisitorial approach of an ombudsman is appropriate for cases in this market that might be highly context dependent,
- it can deliver systemic improvements, and
- it may have cost benefits for vet businesses, especially smaller practices.

3.1 A recognisable model

Since ombudsmen exist in a wide range of sectors, the concept of an ombudsman is well-established and this brings multiple benefits.

The term 'Ombudsman' is recognisable to consumers as an independent complaints body. Ombudsmen exist in many sectors of the economy and resolve hundreds of thousands of consumer cases every year. The Financial Ombudsman is by far the largest service, but even small sectors like removals and double glazing and conservatories offer ombudsman services. The government's guidance on establishing an ombudsman scheme states that the term should be used for genuinely independent redress schemes "as it has wide and increasing national and international public use and understanding".[17]

Which?'s research has found that an ombudsman was the most recognisable form of alternative dispute resolution among consumers. When asked to identify processes and services that can help consumers resolve complaints, nearly a fifth (18%) of consumers spontaneously mentioned an ombudsman. The next most commonly mentioned organisations were Citizens' Advice, trading standards and regulators such as Ofcom and Ofgem. Other ADR mechanisms like mediation and arbitration were rarely mentioned, at a maximum of 1% (for mediation). The term 'adjudication' was not mentioned by anyone. When subsequently prompted with a list of ADR types, nine in ten said they had heard the term 'Ombudsman'. Furthermore, when asked about their understanding of the term, if any, independence and impartiality was a key theme identified by respondents.[18] This demonstrates the recognisability of the term 'Ombudsman' as signalling a means of seeking redress, whereas terms such as 'binding adjudication' will have little meaning to consumers.

This recognisability is particularly critical in the veterinary sector given the evidence from our research that pet owners who had escalated their complaint see the current redress system as stacked against pet owners in favour of the vet. Most did not escalate their complaint to

[17] Cabinet Office (2022) Guidance on new Ombudsmen scheme, accessed at: https://www.gov.uk/government/publications/new-ombudsman-schemes-guidance/guidance-on-new-ombudsmen-scheme

[18] From an online poll with a nationally representative sample of more than 2,000 UK adults - in-depth results available at: https://www.which.co.uk/policy-and-insight/article/consumer-awareness-of-alternative-dispute-resolution-services-a1t7f4Q0K8Xz

begin with, often because they did not think it would be successful or didn't even know how to escalate it. As an authoritative and recognisable body, an ombudsman could address this sense of powerlessness among consumers in seeking redress. In fact, more than one pet owner who took part in our complaints research spontaneously raised the idea of an ombudsman as something that should exist for veterinary services.

Furthermore, **there is an existing framework for the establishment and delivery of an ombudsman** with published guidance from the Cabinet Office on the creation of a new ombudsman and a number of well established existing schemes modelling the approach.

Finally, as an ombudsman, **the scheme could become part of the Ombudsman Association**, which would allow it to benefit from the experience of a wider community of ombudsman schemes and enable it to adopt a range of established best practices. The Association's criteria for the recognition of ombudsman offices include being "visibly and demonstrably" independent from those they investigate, acting with fairness in decision making, being accessible to consumers, having impact through driving improvements in the sector in which they operate and being open and transparent in the way they operate and publish decisions.[19] These are precisely the principles that would address the shortcomings in the current system, as evidenced by our complaints research and the CMA's market investigation.

Incorporating many of the key features of an ombudsman such as independence and binding decisions into a redress scheme but not explicitly calling it an 'Ombudsman' risks needlessly forgoing the important benefits set out above.

3.2 Appropriateness to veterinary services

The ombudsman approach to decision-making is well suited to this market. Two defining features of ombudsmen decision making are that they take an inquisitorial approach, seeking further information and evidence when needed, and that decisions are made on the basis of what is fair and reasonable, rather than only applying fixed rules as may be the case in a simpler adjudication based scheme. This enables an ombudsman to take account of the full context of a complaint, including factors such as distress, inconvenience and communication failures.

As our research has shown, complaints in this market can be very complex and emotionally charged, involve clinical uncertainty, and significant information asymmetries between consumers (pet owners) and veterinary professionals, making an ombudsman approach the ideal one in this sector.[20] Creating a scheme with less suitable and flexible decision making abilities risks reducing the number of complaints it can successfully resolve and thus diminishing its value.

Mediation can be part of the ombudsman process. It is clear that there are benefits to mediation in the veterinary sector and the existing scheme works well for many people.

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[19] Ombudsman Association (2020) Criteria for the recognition of Ombudsman offices, accessed at: https://www.ombudsmanassociation.org/sites/default/files/2020-11/OA-TermsandRulesJuly2019.pdf
[20] Which? (2025) Complaints and redress in veterinary services, accessed at: https://www.which.co.uk/policy-and-insight/article/complaints-and-redress-in-veterinary-services-a5z611X9tZzf

Therefore, we think that a veterinary ombudsman scheme could be designed to incorporate mediation, with adjudication being used in cases where mediation is not successful or appropriate. This is a common model for an ombudsman. The Motor Ombudsman, Rail Ombudsman and Parliamentary and Health Service Ombudsman all offer mediation as an early resolution mechanism where appropriate.[21] The Legal Services Ombudsman has an early resolution team which can help to 'negotiate an agreement' between the customer and service provider.[22] A similar model could be adopted in the veterinary sector, maintaining the ability to resolve disputes more quickly and informally through mediation, whilst providing a more formal adjudication process where needed.

3.3 Delivering systemic improvements

One of the key advantages of an ombudsman, over other ADR schemes, is that it helps identify systemic issues, not just resolve individual cases. By spotting patterns in complaints and feeding them back to regulators and directly to businesses, an ombudsman can help to drive evidence-based improvements that address the root cause of problems. This will ultimately lead to better service provision and fewer complaints, to the benefit of consumers and businesses.

The Financial Ombudsman Service (FOS) regularly publishes data on complaints received to its service, identifying insights such as increases or decreases in complaint numbers, products or firms that receive relatively more complaints, or where more complaints are upheld.[23] The Ombudsman's data is also actively used by the sector regulator to inform their own work and advice to businesses on good practice and areas for improvement.[24] Whilst a veterinary ombudsman would be much smaller in terms of budget and cases than a service like the FOS, it does provide a model for the valuable information that an ombudsman can gather about the sector it operates in.

3.4 Benefits to businesses

It is clear that when complaints and redress processes don't work effectively this negatively impacts both pet owners and vet professionals. Without a single, trusted body to approach, several of the pet owners in our research chased multiple routes to have their case heard over a number of years.[25] This caused undue distress and inconvenience for the pet owners,

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[21] https://www.ombudsman.org.uk/making-complaint/how-we-deal-complaints
https://www.legalombudsman.org.uk/how-to-complain/
https://www.themotorombudsman.org/about-us/how-we-work/
https://www.railombudsman.org/en/complaint?step=5
[22] Legal Services Ombudsman - How To Complain, accessed at:
https://www.legalombudsman.org.uk/how-to-complain/
[23] Financial Ombudsman Service - Our insight, accessed at:
https://www.financial-ombudsman.org.uk/businesses/resolving-complaint/our-insight
[24] Financial Conduct Authority (2024) - Complaints and root cause analysis: good practice and areas for improvement, accessed at:
https://www.fca.org.uk/publications/good-and-poor-practice/complaints-and-root-cause-analysis-good-practice-and-areas-improvement
[25] Which? (2025) Complaints and redress in veterinary services, accessed at:
https://www.which.co.uk/policy-and-insight/article/complaints-and-redress-in-veterinary-services-a5z611X9tZzf

and undoubtedly for the clinicians and practices involved too. **An ombudsman would simplify complaints and provide a clear, authoritative endpoint for disputes.**

Additionally, the ombudsman could be set up to achieve so-called Early Facilitated Resolution. This would allow individual businesses to direct potential complainants directly to the ombudsman in the first instance so that the ombudsman collects the relevant information and facilitates communication between the vet business and the pet owner. This is similar to how the business Resolver operates.[26]

There are numerous advantages to this approach. Most importantly, pet owners and **vet businesses could benefit from the faster resolution of complaints.** Professor Chris Hodges reports that one ombudsman was able to immediately resolve 20% of cases that had previously been unresolved through internal complaints mechanisms simply because of better formulation of complaints and because consumers had more confidence in the response of the business because the process had been conducted through the ombudsman.[27]

Such a system could also provide a cost saving to businesses because they do not need to run their own complaint process, while both parties benefit if the issue needs to proceed to mediation or adjudication because there is no need to communicate information multiple times and resolution should be faster. It also means that more data passes through the ombudsman and can be used to identify potential systemic improvements.

The benefits from such a system might be relatively large for independent vet businesses. Their smaller scale might make it harder to have an efficient complaints procedure, while complaints that are not easily resolved without adjudication could prove significantly more disruptive to their business so it is crucial these are resolved quickly and efficiently.

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[26] https://www.resolver.co.uk/about
[27] Christopher Hodges (2022) *Outcome-based Cooperation, Chapter 16*.

4. Design and implementation considerations

The scheme and its core principles should be established by legislation and not left to the regulator's discretion, ensuring its independence and long-term stability. This approach is consistent with established precedent in other sectors, such as financial and legal services, where ombudsman schemes are set out in statute, reflecting the need for robust consumer protection in markets characterised by significant information asymmetry.

In order to deliver the best value, an ombudsman scheme should include the following features (many of which are already standard for an ombudsman):

- It should be **mandatory** to ensure universal access to dispute resolution and redress.
- It should have access to **appropriate expertise,** for example through specialist case handlers and the ability to draw on independent external experts where needed.
- Decisions should be **binding** on the service provider, as is already recommended by the CMA as a feature of any new redress scheme in the sector and is the standard for an ombudsman scheme in any sector.
- It should adopt a tiered approach combining **early resolution (ie mediation) with formal adjudication where needed.** This is a well-established and effective model used across existing ombudsman schemes, allowing straightforward complaints to be resolved quickly and without undue burden while retaining the ability to issue binding decisions in more complex cases.
- There should be a requirement for the ombudsman to **publish annual reports** or similar outputs, ensuring a high level of transparency and accountability in the way it operates. This should include metrics like the volume and types of complaints, resolution rates and time taken, and outcomes like the proportion of complaints upheld and remedies awarded.
- Requirements should be put in place to ensure that **insights from the ombudsman's work are regularly fed back to the regulator and the wider sector.** This will allow trends and recurring issues to be identified and addressed, ensuring that complaints data drives continuous improvement across the sector and therefore maximises the value of the scheme.
- The scheme should be **free to the consumer**, and could be funded by an annual levy paid by firms that is proportionate to their size or market share, fees per complaint to incentivise good business behaviour, or a combination thereof.

5. Conclusion

The establishment of a veterinary services ombudsman is the logical next step following the CMA's recommendation for an independent, binding redress scheme. It will be able to deliver greater public confidence and better dispute resolution without adding undue burden on businesses. This approach is superior to alternative models due to its recognisable nature, suitability for complex veterinary complaints, and ability to drive systemic improvements. Ultimately, an ombudsman would simplify complaints and provide a clear, authoritative endpoint for disputes, preventing the undue distress and inconvenience currently experienced by both pet owners and veterinary professionals.

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