

Options for Registration of Veterinary Nurses

Executive Summary

The Sustainable Practice Committee (SPC) of the AVBC is investigating options for the registration of veterinary nurses in Australia and New Zealand. Currently, Western Australia (WA) is the only jurisdiction which approves persons to perform specific duties prescribed for veterinary nurses (*Veterinary Surgeons Regulations 1979* (reg 65)).

Governments have generally been focusing on 'right-touch' principles,¹ decreased regulation, and reduction of 'red-tape'. Additional regulation therefore requires the associated need to be clearly outlined together with the objective of government action followed by a consideration of options informed by stakeholder consultation.

Specifically, options for the registration and regulation of veterinary nurses may be approached through the eight principles of right-touch regulation:

1. Identify the problem before the solution
2. Quantify and qualify the risks
3. Get as close to the problem as possible
4. Focus on the outcome
5. Use regulation only when necessary
6. Keep it simple
7. Check for unintended consequences
8. Review and respond to change.

The SPC formed the view that significant legislative change across all jurisdictions would be difficult to achieve. It may be possible to realise the benefits of regulating veterinary nurses through the addition of a consistent definition of a veterinary nurse within veterinary legislation across Australasia. This definition could be linked to registration with a government veterinary regulator or non-government regulator responsible for determining the educational and professional standards for veterinary nurses. Such an approach would align with right-touch principles and would minimise the regulatory burden for the profession and the public, minimise the administrative load for individual veterinary regulators in Australia and provide the potential for a consistent regulatory framework across all jurisdictions.

Need for Government Action

Whilst veterinary nurses comprise approximately 42% of the veterinary services workforce in Australia,² there is currently no legislated definition of a veterinary nurse and, with the exception of WA, the legislation generally allows any person to assist a veterinarian and perform a wide range of tasks that could adversely affect animal welfare.

¹ Professional Standards Authority 2018, Right-touch regulation in practice, international perspectives, Professional Standards Authority for Health and Social Care. Available: https://www.professionalstandards.org.uk/docs/default-source/publications/thought-paper/right-touch-regulation-in-practice---international-perspectives.pdf?sfvrsn=a5b97520_8. Accessed 21 April 2022.

² Australian Industry and Skills Committee 2021, Veterinary Nursing, National Industry Insights Report. Available: <https://nationalindustryinsights.aisc.net.au/industries/animal-care-and-management/veterinary-nursing>. Accessed 23 February 2022.

Whilst the number of veterinarians has been shown to grow at a rate greater than the population and household growth,³ there is a significant shortage of veterinarians in Australasian jurisdictions and these shortages may contribute to stress and burnout in the profession⁴ and poor animal welfare outcomes. In addition, the recent pandemic and natural disasters have highlighted an over-reliance on overseas trained veterinarians to meet the needs of the veterinary profession and a vulnerability in being able to adequately respond to both human and animal emergencies.

There is an increasing population of degree qualified veterinary technicians and highly trained veterinary nurses who have limited opportunities but are capable of making a more substantial contribution to the provision of veterinary services in Australasia.⁵ Accordingly, a regulated veterinary nursing profession could improve the capacity and efficiency of the mostly small businesses delivering these services to urban, regional and remote communities, thereby reducing the pressures on veterinarians and improving animal welfare outcomes.

Further, there is increasing community concern in relation to the growing cost of veterinary services and its potential impact on animal welfare⁶ and improvements in the capacity and efficiency of veterinary businesses have the potential to improve animal welfare outcomes and decrease the cost of these services to consumers.

Finally, the OIE recognises the importance of regulating and applying disciplinary measures to both veterinarians and veterinary paraprofessionals and its recent evaluation of the Performance of Veterinary Services in Australia noted the failure of all states and territories of Australia (with the exception of Western Australia⁷) to regulate veterinary paraprofessionals thereby leading to a lower level of advancement than comparable countries such as the UK and USA.

Failure to act to increase the capacity of veterinary services through regulation of veterinary paraprofessionals (such as veterinary nurses and veterinary technicians) may:

- Expose the Australasia to greater risks from human and animal emergencies
- Leave these highly trained professionals with limited career options leading to significant wastage and inhibit further developments in veterinary nursing care
- Maintain an over-reliance on overseas trained veterinarians in an increasingly competitive global market
- Expose the individual regulators to internal and external pressures through applications from minimally qualified individuals seeking to address market opportunities created by the shortage of veterinarians and thereby risking long and short-term animal welfare outcomes
- Adversely impact the reputation of Australia and New Zealand as leaders in the provision of veterinary services and animal welfare through limiting the Performance of Veterinary Services evaluations by the OIE.

³ Veterinary Practitioners Board 2021, Demographic data for veterinarians in NSW. Available: <https://www.vpb.nsw.gov.au/sites/default/files/images/20211005%20Demographics.pdf>. Accessed 14 March 2022.

⁴ Hatch PH, Winefield HR, Christie BA & Lievaart JJ 2011, Workplace stress, mental health, and burnout of veterinarians in Australia, *Aust Vet J* vol. 89, no. 11, pp. 460-8.

⁵ Clarke P 2002, Presentation to NIAG 2022, Bachelor of Veterinary Technology update, 30 January 2022, National Industry Advisory Group.

⁶ Dennis J, High cost of veterinary care at major chains causing pets to be unnecessarily euthanised, senior vets say, ABC News. Available: <https://www.abc.net.au/news/2021-09-25/qld-pet-surgery-fees-vet-clinics-pricing/100482206> Accessed 21 April 2022.

⁷ Some regulation of paraprofessionals is possible in NSW

Objective of Government Action

The objectives of government action in recognising and regulating veterinary nurses are to:

1. Provide for improvements in animal welfare
2. Provide for improvements in the capacity and efficiency of the mostly small businesses operating as veterinary practices
3. Provide for the regulation and application of disciplinary measures to veterinary paraprofessionals and thereby raise the level of advancement of the veterinary statutory body as evaluated by the OIE
4. Provide an opportunity for the harmonisation of veterinary regulation with other developed nations such as the UK and USA, as well as Western Australia and act as an impetus for regulating veterinary paraprofessionals by other statutory authorities in Australia and New Zealand.

Consideration of Options

The options considered in this report for achievement of the above objectives are:

1. Maintenance of status quo: A voluntary, non-statutory, licensing scheme to be administered by the Australian Veterinary Nurse and Technician (AVNAT) registration scheme of the Veterinary Nurses Council of Australia
2. Modification of existing veterinary practice legislation to provide for the regulation of veterinary nurses by the individual jurisdiction's veterinary regulator
3. Modification of existing veterinary practice legislation to provide for the regulation of veterinary nurses by a non-statutory national body such as the VNCA or AVBC
4. Creation of a separate statutory regulation through new legislation in each jurisdiction.

Status Quo: Voluntary, Non-Statutory Licensing Scheme

The Australian Veterinary Nurse and Technician (AVNAT) registration scheme was launched by the Veterinary Nurses Council of Australia (VNCA) in April 2019.⁸ It is a voluntary scheme with a stated purpose aligned with meeting the needs for government action:

- Facilitating consistency in veterinary nursing education
- Improving standards of practice
- Regulating veterinary nurse conduct
- Improving animal welfare
- Aligning with international standards
- Safeguarding the public interest and protecting public health.

There are currently 800 registered veterinary nurses under this scheme from an estimated population of persons employed as veterinary nurses of 12,600.⁹

The scheme has the following advantages:

- Minimal compliance costs for businesses and consumers particularly as it is a national, voluntary scheme.

⁸ Veterinary Nurses Council of Australia, AVNAT Registration Scheme, Available:

<https://www.vnca.asn.au/avnat/>. Accessed 23 February 2022.

⁹ Australian Industry and Skills Committee 2021, Veterinary Nursing, National Industry Insights Report.

Available: <https://nationalindustryinsights.aisc.net.au/industries/animal-care-and-management/veterinary-nursing>. Accessed 23 February 2022.

- Costs associated with development in relation to resources, time and finances and administration have already been absorbed or will continue to be maintained by the VNCA and there is no impact on government.
- There is the potential to achieve benefits to the education of veterinary nurses, improvements in animal welfare, alignment with international standards and protection of the public as outlined in the purpose of this scheme.

The scheme has the following disadvantages:

- A voluntary scheme not founded in legislation is limited in its capacity to achieve its desired purpose and unable to satisfactorily achieve the objectives of government action noted above.
- The AVNAT was developed and is being implemented by the VNCA which is the professional association for veterinary nurses. The VNCA does not represent all veterinary nurses and as a result there is the potential for reputational risk, perceived and actual, both within the veterinary nursing profession and the public.

Statutory Regulation through Protection of Title

Statutory regulation is vital to the development of a profession and provides the opportunity for protection of title. As noted above, there is currently no statutory definition of a veterinary nurse despite a number of qualifications, varying from AQF level 4 to AQF level 7, leading to possible employment as a veterinary nurse.

Veterinary practice legislation could include a definition of veterinary nurse thereby leading to the protection of this title and potential for establishing educational standards and regulation. A definition developed in consultation with all jurisdictions in Australasia, would provide an opportunity for harmonisation aligned with the principles of mutual recognition.

Under this modification of existing legislation there are three options for regulation of persons defined as veterinary nurses:

1. Regulation by the AVNAT registration scheme

Veterinary practice legislation may define a veterinary nurse as a person with prescribed qualifications who is registered with the AVNAT registration scheme thereby requiring a person using this title to be registered and subject to regulation by this body. Under this scenario it is also likely that either AVNAT or the VNCA would be responsible for determining acceptable veterinary nursing qualifications.

This option has the following advantages:

- The title veterinary nurse is protected by legislation leading to a statutory requirement for registration
- A national registration scheme would ensure mobility of veterinary nurses and establish a standard cost structure for registrants with potential for economies of scale noting that veterinary nurses typically earn between \$44,000 and \$87,000 per year with entry level nurses earning \$39,000 per year¹⁰ and average salary \$48,700 per year¹¹
- The costs associated with establishing this framework have largely already been borne by the VNCA.

¹⁰ Cochrane A 2021, The truth about a career in veterinary nursing, TafeCourses.com.au. Available: <https://www.tafecourses.com.au/resources/the-truth-about-a-career-in-veterinary-nursing/>. Accessed 23 February 2022.

¹¹ Payscale 2022, Average veterinary nurse hourly pay in Australia. Available: https://www.payscale.com/research/AU/Job=Veterinary_Nurse/Hourly_Rate. Accessed 25 February 2022.

This option has the following disadvantages:

- The VNCA does not represent all veterinary nurses and as a result there is the potential for reputational risk, perceived and actual, both within the veterinary nursing profession and the public
- Whilst the VNCA and AVNAT have developed some expertise in regulation through this voluntary scheme, VNCA was developed as a professional body to represent nurses rather than a body developed to accredit qualifications and regulate a profession
- VNCA members have funded the AVNAT and whilst the scheme currently registers both VNCA members and non-members this may not be sustainable in the long-term if a large percentage of registrants are non-members
- There is the potential for a breakaway group to also request a role in registering and regulating veterinary nurses
- Regulation is being achieved through outsourcing by the statutory regulator in each jurisdiction.

2. Regulation by the Australasian Veterinary Boards Council

The Australasian Veterinary Boards Council (AVBC) has the following core functions:

- Providing a forum for discussion, advice and co-operation among the veterinary boards in Australia and New Zealand
- Encouraging the standardisation and quality assurance of veterinary services to the community
- Assuring and promoting uniform educational standards through accreditation of veterinary schools, the Australasian Veterinary Examination, assessment of veterinary qualifications for migration and assessment of specialist qualifications.

As above, veterinary practice legislation may define a veterinary nurse as a person with prescribed qualifications who is registered with the AVBC. Under this scenario the AVBC would be responsible for determining acceptable veterinary nursing qualifications.

This option has the following advantages:

- The title veterinary nurse is protected by legislation leading to a statutory requirement for registration
- A national registration scheme would ensure mobility of veterinary nurses and establish a standard cost structure for registrants with potential for economies of scale
- The AVBC may be willing to purchase AVNAT resources reducing costs associated with establishment or duplication
- Alignment with the core functions and existing expertise available to the AVBC particularly in the areas of examination (Australasian Veterinary Exam) and accreditation of education programs (Veterinary Schools Accreditation Advisory Committee)
- Reduced costs are likely for veterinary businesses and registrants compared to a state-based approach to registration and regulation
- Alignment with a long-standing and successful model implemented in the US whereby the American Association of Veterinary State Boards provides a similar role.

This option has the following disadvantages:

- The AVBC currently does not register veterinarians or investigate complaints against veterinarians and therefore does not possess the expertise and processes available to AVNAT
- The AVBC may not be willing to purchase AVNAT resources leading to duplication of costs
- Registration and complaint investigation functions are not recognised as core functions of the AVBC and therefore a broader definition of these core functions within the AVBC may be required
- Regulation is being achieved through outsourcing by the statutory regulator in each jurisdiction.

3. Regulation by veterinary regulators within each jurisdiction

In addition to defining the term veterinary nurse the existing veterinary practice legislation would be modified to include a section for the registration and regulation of veterinary nurses.

This option has the following advantages:

- The registration and regulation of veterinary nurses would be controlled by the existing veterinary statutory body clearly aligned with OIE requirements for advancement in the performance of veterinary services evaluation
- The veterinary statutory board has the existing structures and expertise derived from registration and regulation of veterinarians
- There is the potential for the costs of implementation to be less as existing resources for registration and regulation of veterinarians may be mirrored
- This model is already successfully being applied in Western Australia.

This option has the following disadvantages:

- State-based regulation creates a more complex system for mobility within the profession as evidenced by the current state-based veterinary regulation model in Australia
- State-based regulation is likely to involve increased costs for businesses and registrants as evidenced by the current veterinary model which has registration renewal fees in Australia ranging from \$124 to \$731¹²
- Cost allocations for this register and regulation may be difficult to clearly separate from the veterinary register leading to possible subsidies provided to either veterinarians or veterinary nurses
- Veterinary regulators may not receive sufficient additional funding or resources required for implementation.

Statutory Regulation through Adoption of Specific Legislation

Establishment of specific veterinary nursing legislation similar to existing veterinary practice legislation to define veterinary nurses and establish a separate statutory framework for the regulation of veterinary nurses.

This option has the following advantages:

- Clearly establishes veterinary nursing as a separate profession
- This model is aligned with the regulation of allied health practitioners.

This option has the following disadvantages:

- State-based regulation creates a more complex system for mobility within the profession as evidenced by the current state-based veterinary regulation model
- State-based regulation is likely to involve increased costs for businesses and registrants as evidenced by the current veterinary model which has registration renewal fees in Australia ranging from \$124 to \$731¹³
- With similar functions and responsibilities to the veterinarian register it is possible registration costs will be similar for veterinary nurses who typically earn significantly less than veterinarians¹⁴

¹² Veterinary Practitioners Board NSW 2021, Report on fees and remuneration. Available: <https://www.vpb.nsw.gov.au/sites/default/files/images/2021%20Report%20on%20Fees%20and%20Remuneration.pdf>. Accessed 25 February 2022.

¹³ Veterinary Practitioners Board NSW 2021, Report on fees and remuneration. Available: <https://www.vpb.nsw.gov.au/sites/default/files/images/2021%20Report%20on%20Fees%20and%20Remuneration.pdf>. Accessed 25 February 2022.

¹⁴ Payscale 2022, Average veterinarian salary in Australia. Available: <https://www.payscale.com/research/AU/Job=Veterinarian/Salary>. Accessed 25 February 2022.

- Arguably not proportional to the problem outlined in that it involves establishment of a new licence system through new legislation to address objectives which arguably will be achieved through lower level intervention.

Consultation with Stakeholders

The major stakeholders identified are:

1. Persons employed as veterinary nurses, veterinary technicians and those who had completed qualifications in these areas
2. The Veterinary Nurses Council of Australia (VNCA)
3. Registered veterinarians
4. The Australian Veterinary Association (AVA)
5. Veterinary registration and licensing authorities in Australia and New Zealand
6. The Australasian Veterinary Boards Council (AVBC)
7. Veterinary Schools of Australia and New Zealand (VSANZ)
8. Veterinary Nursing Registered Training Organisations (RTOs)

A questionnaire was designed to address the following research questions:

1. What is the level of support from stakeholders for registration of veterinary nurses?
2. What are the potential advantages and disadvantages of registration of veterinary nurses?
3. What do stakeholders consider to be the preferred registration body for veterinary nurses?
4. What is the level of support from stakeholders for proposed definition of a veterinary nurse?
5. What are the key differences in stakeholder responses to the above research questions?

Preferred Option

A preferred option will be developed derived from stakeholder consultation and a final report provided to the AVBC for its consideration.

Evaluation and Review

As noted under principles of right-touch regulation it will be vital for any change to be monitored for unintended consequences. Again, a simpler approach to address this issue will provide for more rapid and effective possible responses.

Definitions

Animal attendant	A person who may have completed a VET qualification in animal studies, animal technology, captive animals, companion animal services, or related area but who may not have formal qualifications. ¹⁵
Animal technician	A person who usually has completed a VET qualification in animal technology, captive animals or laboratory technology specialising in biological testing, environmental monitoring or biotechnology. ¹⁵
Approved person	A person approved by the Veterinary Practitioners Board to perform one or more restricted acts of veterinary science.
Supervision	Three levels of supervision: <ol style="list-style-type: none"> 1. Immediate supervision is when the veterinarian is immediately available to provide personal assistance (physically adjacent) when required 2. Direct supervision is when the veterinarian is readily available to provide personal assistance (physically close-by) when required 3. Indirect supervision is when the veterinarian is contactable and available to provide assistance when required
Veterinarian	A person who has completed an accredited veterinary science degree at university or a relevant degree such as science, animal science or veterinary bioscience, followed by a Doctor of Veterinary Medicine ¹⁶ and is registered with a veterinary board in Australia.
Veterinary nurse	A person who has generally completed a VET qualification (Certificate IV) or who has completed a traineeship. ¹⁶
Veterinary nurse assistant	A person who has generally completed a VET qualification (Certificate II or III in Animal Studies). ¹⁶
Veterinary technician	A person with a degree in Veterinary Technology. ¹⁶

Change veterinary nurse definition to:

Registered Veterinary Nurse (Division 1)	A person with a degree (AQF 7) in veterinary technology or equivalent major and who is registered by a recognised governing body
Registered Veterinary Nurse (Division 2)	A person with a VET qualification (minimum AQF 4) (diploma or certificate IV) and who is registered by a recognised governing body
Registered Veterinary Nurse (Division 3)	A person with such qualifications and experience in the field of veterinary nursing to justify registration by a recognised governing body

¹⁵ Good Universities Guide <https://www.gooduniversitiesguide.com.au/careers-guide/>

¹⁶ Applied Vocational Training <https://www.appvoc.com/>

Questionnaire

<https://www.surveymonkey.com/r/W3S9ZZ2>

Additional References

Clarke P, Henning J, Coleman G & Schull D 2019, Recruiting the graduate voice: informing higher education initiatives to underpin an emerging, veterinary paraprofession in Australia, *Journal of Vocational Education & Training*, 71:1, 126-152.