

PIRSA

A new Veterinary Services Bill for South Australia

Public Consultation Summary



**Government
of South Australia**
Department of Primary
Industries and Regions

A new Veterinary Services Bill for South Australia – Public Consultation Summary

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Further information about the project

Further information can be found on:
PIRSA's Website: pir.sa.gov.au/legislation_reform
YourSAy – yoursay.sa.gov.au/veterinaryservicesact

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Abbreviations

Animal care providers	Non-veterinary animal care service providers
AVA	Australian Veterinary Association
AVBC	Australasian Veterinary Boards Council
Bill	South Australian Veterinary Services Bill 2023
Current Act	South Australian <i>Veterinary Practice Act 2003</i>
Draft Bill	Draft Veterinary Services Bill 2022
Paraprofessionals	Veterinary Nurses and Veterinary Technicians
PIRSA	Department of Primary Industries and Regions
SACAT	South Australian Civil and Administrative Tribunal
SAVEM	South Australian Veterinary Emergency Management
the Board	Veterinary Surgeons Board of South Australia where in reference to the current Board established under the <i>Veterinary Practice Act 2003</i> , or Veterinary Services Regulatory Board of South Australia where in reference to the proposed Board under the <i>Veterinary Services Bill 2023</i>
Tribunal	South Australian Civil and Administrative Tribunal
Veterinarian	Veterinary Surgeon as defined by the <i>Veterinary Practice Act 2003</i> , or Veterinarian as defined by the <i>Veterinary Services Bill 2023</i>

Background

The Department of Primary Industries and Regions (PIRSA) has developed a new Veterinary Services Bill for South Australia (SA). The Bill seeks to ensure veterinary practice regulation in the state aligns with the contemporary nature of the profession and standards expected by users and providers of veterinary services.

In December 2020, PIRSA began a review of the existing legislation to ensure SA maintains contemporary and flexible veterinary regulation and a registration framework that continues to meet the objectives of supporting animal health, safety and welfare and the public interest.

Initial stakeholder and public consultation relating to a discussion paper was undertaken during 2020 and 2021. Following consideration of consultation feedback received, a draft Bill was prepared. The draft Bill recognised changes in veterinary practice and animal care generally since the *Veterinary Practice Act 2003* (current Act) came into effect. It also reflected the changed role of the Board, following the transfer of disciplinary proceedings to the South Australian Civil and Administrative Tribunal (SACAT) in 2020.

The draft Bill maintained important functions from the current Act, while building in important changes, which include:

- modernising Board structure
- supporting effective Board functioning through expanded functions including but not limited to communication and transparency
- enabling increased flexibility of registration and the registration of veterinary premises
- removing unnecessary offence provisions and administrative burden.

Public Consultation

Public consultation on the draft Bill was undertaken from 14 December 2022 to 19 February 2023 via YourSAy.

Consultation was publicised in a range of ways.

A media release to announce the commencement of public consultation was published on 14 December 2022.

All consultation materials were available through YourSAy, the link to which was widely publicised across PIRSA's social media accounts and sent to 32,885 registered YourSAy users across two emails.

The legislation reform page of PIRSA's website also directed stakeholders to the YourSAy page.

A direct email was sent to 140 key stakeholders and relevant organisations, with an additional email sent to 200 of PIRSA's broader stakeholders.

PIRSA used the agency's social media accounts across Facebook, Twitter, and LinkedIn, that have a total following of 19,469 users, to create awareness and call for feedback at various points during consultation.

PIRSA also held meetings with key stakeholders as part of the consultation process and to progress development of the final Bill.

Submissions received

PIRSA received 36 submissions from external stakeholders as outlined below.

In addition, feedback was received from five South Australian Government stakeholders; SA Health, Department for Environment and Water, Department of the Premier and Cabinet, SA Civil and Administrative Tribunal and the Small Business Commissioner.

All feedback was considered in finalisation of the Bill.

Stakeholder category	Stakeholder
Veterinary surgeons, former veterinary surgeons, and veterinary businesses and organisations	<ol style="list-style-type: none"> 1. Alejandra Arbe 2. Animal Management in Rural and Remote Indigenous Communities (AMRRIC) 3. Australian Veterinary Association (AVA) 4. Bill Trowbridge 5. David Robertson 6. Duncan McFetridge 7. Anonymous 8. Geoff Warren 9. Greg Riessen 10. Jenny and David McLelland 11. Nina Coulthard 12. Veterinary Surgeons Board of South Australia (VSBSA)
Consumers and consumer organisations	<ol style="list-style-type: none"> 1. Aleks Larsen 2. Bitless Inc 3. Dianne Ford 4. Graeme Hamilton 5. Helen Gibbs 6. Linzi Herbert 7. Livestock SA 8. Michael Pilling 9. Norrie 10. Anonymous 11. Rebecca Chan 12. South Australian Dairyfarmers' Association (SADA) 13. The United Bird Societies of South Australia Inc
Education and education providers	<ol style="list-style-type: none"> 1. Educators for the Allied Veterinary Health Professions in Higher Education (Australia) ('The Educators') 2. School of Animal and Veterinary Sciences, University of Adelaide 1 3. School of Animal and Veterinary Sciences, University of Adelaide 2 4. Veterinary Nursing Research Group (VNRG)
Animal welfare organisations	<ol style="list-style-type: none"> 1. Animal Care Australia (ACA) 2. RSPCA
Paraprofessionals	<ol style="list-style-type: none"> 1. Veterinary Nurses Council of Australia (VNCA) 2. Alfred Senar II
Not specified	<ol style="list-style-type: none"> 1. The Law Society of South Australia (Law Society SA) 2. Nattii 3. Anonymous

Feedback analysis and reporting

All submissions received were read and have been carefully considered in the development of the final Bill. Sensitive information provided in submissions has been considered, where relevant.

As a result of feedback received, changes have been made to the Bill. Additionally, the final Bill includes changes to the order and structure of clauses to represent contemporary drafting approaches. To assist stakeholders in tracking clauses between the current *Veterinary Practice Act 2003*, draft Veterinary Services Bill 2022 released for public consultation and final Veterinary Services Bill 2023, a mapping guide has been provided in Appendix A.

This report provides a summary of the feedback received from stakeholders with a particular focus on the core issues raised during public consultation, along with PIRSA's response to the feedback. The report does not intend to address every issue raised. If feedback has not been represented in this report, it does not mean that it has not been considered during development of the final Bill. Any aspects of submissions that were deemed to be offensive, insulting and/or potentially defamatory were not considered. Feedback received related to regulation development and implementation, while not included in this report, has been reviewed and will be considered once the Bill has passed Parliament.

This report is designed to be read in conjunction with the Veterinary Services Bill 2023 as introduced to the Legislative Council on 6 July 2023. Feedback has been reported based on themes that, in most instances, map to the Parts of the Bill as introduced. Clause references have been marked in bold font and/or are explicitly stated and relate to the Bill as introduced unless otherwise specified.

Summary of issues raised

Long title

Feedback received	Response
'High standards' should be replaced with minimum 'standards' as high standards of care can cause price hikes and adversely affect consumers.	The term 'high standards' refers to veterinarians' conduct and competence, as reasonably expected by users of veterinary services. No change.
The term 'protect' connotes protection of the public and animals from veterinarians rather than promoting animal health, safety and welfare by regulating veterinary services.	The term 'protect' has been replaced with 'support'.

Interpretation

Summary of feedback received

The proposed change from 'veterinary treatment' in the current Act to 'veterinary services' in the Bill was broadly supported. Stakeholders that expressed their support for the change generally acknowledged the term better reflects contemporary veterinary practice. There were a large number of submissions that provided feedback regarding the changes to the definition of veterinary services, particularly the inclusion of 'the performance of an invasive or surgical procedure on an animal'. These stakeholders raised that the term 'invasive' may have unintended consequences of capturing common husbandry practices that consumers perform on their own animals.

There were also several submissions that provided suggestions for how to improve the interpretation provisions in the Bill. This included suggestions to define what a 'fit and proper person' is and to define the term 'medical treatment'. There were also requests to define the terms 'invasive' and 'surgical'. Two submissions suggested combining the 'castration or spaying of an animal' with the performance of an invasive or surgical procedure.

Feedback received	Response
"fit and proper"	
The term "fit and proper person" is not defined and open to interpretation by the Board.	The term 'fit and proper' appears in the Bill 3 times and all are in relation to a veterinarian. The Board is proposed to have the collective expertise to register veterinarians and, in the process, appropriately interpret 'fit and proper' in the context of a veterinarian.
"health professional"	
Clarification sought as to if "health professional" includes paraprofessionals such as veterinary nurses and veterinary technicians.	References to 'health professional' in the Bill (clauses 21 and 62) are intended to refer to medical practitioners and psychologists, with the definition also including flexibility for the Board to recognise other relevant professions or occupations as required (clause 3(1), 'health professional'). This definition is not intended to refer to veterinary paraprofessionals such as veterinary nurses and technicians.
"veterinary service"	
Change from "veterinary treatment" to "veterinary service" supported.	Noted.
Recommendation that all aspects of dentistry should be captured in the definition.	The 'performance of a dental procedure on an animal' has been included in the definition. Certain dental procedures permitted to be performed by non-

	veterinarians will be considered during regulation development.
There is variation between the use of singular and plural terminology regarding animal/s.	The term 'animals' has been replaced with 'animal' in the Bill. The <i>Legislation Interpretation Act 2021</i> provides that as a general interpretation rule, singular includes plural and vice versa.
Clarity requested about the interpretation of "the diagnosis of a disease or physiological condition in, and an injury to, an animal"	Wording has been reviewed and 'and an injury to' has been changed to 'or an injury to' to better reflect intent (clause 3(1), 'veterinary service'(a)).
The term "medical treatment" should be defined so that prescription of S4 and S8 veterinary medicines is included and over the counter veterinary medicines are excluded.	<p>Medical treatment is intended to include more than the administration of controlled substances. Defining the term further could have unintended consequences in limiting the definition.</p> <p>The prescription of controlled substances by registered veterinarians is managed under the <i>Controlled Substances Act 1984</i> and is outside the scope of this legislation.</p> <p>Where further clarity is needed with regard to the definition of veterinary services, the Bill provides flexibility to prescribe other acts or activities by the regulations to be a veterinary service. It also allows for acts and activities to be excluded from the ambit of the definition by regulations.</p>
Suggestion to combine "castration and spaying" with "performance of an invasive or surgical procedure on an animal" since castration and spaying are also invasive or surgical procedures.	<p>Specific reference to castration and spaying has been removed from the definition of 'veterinary services' to reduce duplication.</p> <p>Where further clarity is required, this is proposed to be addressed by regulation and align with relevant requirements under the <i>Animal Welfare Act 1985</i>.</p>
Proposal to recognise accreditation and training to support lay persons who perform acts of artificial insemination, castration, spaying and dehorning.	<p>The Bill provides for some defined circumstances whereby it is not an offence for a lay persons to provide veterinary services for money or other consideration, including if provided in the course of employment by an employee of the owner of an animal or other prescribed circumstances (clause 49(2)) (e.g. by a farm hand who is receiving a wage) or if granted an exemption (clause 89), noting that provision of such services would also be subject to the requirements of any other relevant legislation including the <i>Animal Welfare Act 1985</i> and <i>Controlled Substances Act 1984</i>.</p> <p>Nothing in the Bill precludes training and accreditation from being recognised or considered as a basis on which an exemption may be granted. The Bill however will not play any role in developing such training or accreditation.</p>
Inclusion of the term "invasive" may have unintended consequences on husbandry practices, pet/companion keeping community and livestock industries as access to suitable veterinarians may not be possible to meet demand.	The Bill does not preclude a person from performing common husbandry procedures, provided they do not contravene the Bill (such as providing veterinary services for money or other consideration (clause 49)) or any other relevant legislation such as the <i>Animal Welfare Act 1985</i> or <i>Controlled Substances Act 1984</i> .
Request to define the word "invasive" and "surgical" more clearly.	Where further clarity is needed, the Bill provides flexibility to prescribe other acts or activities by the regulations to be a veterinary service. It also allows for acts and activities to be excluded from the ambit of the definition by regulations.

<p>Change in definition of “veterinary service” could limit the scope of complaints that may be made against a veterinarian, particularly when the complaint may be in reference to a non-invasive procedure.</p>	<p>The definition of veterinary services does not limit the scope of complaints that may be made about the conduct of veterinarians.</p>
<p>Comment to ensure the regulation of veterinary services involving the use of controlled substances under the Bill does not inadvertently infer exceptions to, or create inconsistency with, provisions in the <i>Controlled Substances Act 1984</i>.</p>	<p>Noted. This is a matter for consideration during development of subordinate legislation.</p>
<p>Concern about unqualified manual therapists performing ongoing non-invasive therapy following diagnosis and referral.</p> <p>Suggestion to add a requirement for regular veterinary care checks.</p>	<p>The legislation aims to regulate veterinary services to ensure they are performed by registered veterinarians.</p> <p>Enabling non-invasive physical therapy of animals by non-veterinarians supports a multi-modal care model that includes veterinarians where necessary. This does not constitute a change from current legislation. Regularity of veterinary care is the responsibility of an animal owner.</p>
<p>Suggestion that euthanasia of an animal with a controlled substance be specifically defined as a veterinary service and therefore prohibited by non-veterinarians.</p>	<p>Euthanasia using pentobarbitone requires access to scheduled substances which is enabled under the <i>Controlled Substances Act 1984</i> and therefore access is already limited to veterinarians.</p>

Veterinary Services Regulatory Board of South Australia

Summary of feedback received

The proposed changes to the Veterinary Surgeons Board of South Australia elicited diverse responses from stakeholders. Positive feedback included support for the change to the Board's name, and support for its added functions to improve collaboration and transparency. The revised composition of the Board also received support from a diverse range of stakeholder groups.

While generally supportive of Board composition, several organisations provided alternative suggestions on its composition and structure. These suggestions included appointing a veterinary nurse or technician, and appointing veterinarian members with experience in equine animal practice, shelter medicine and the provision of veterinary services in rural and remote Australia. A small number of stakeholders stated that the proposed composition of the Board included too many veterinarians and believed this would impact on its impartiality and independence.

There were diverse views regarding the appropriate Chair (presiding member) of the Board. While many stakeholders supported the ability for a veterinarian member to be appointed as Chair, a number of submissions also stated that the Chair should be independent of the profession to support the independence of the Board.

There was also feedback that the Minister's powers to direct and the Governor's ability to remove Board members may impact on the Board's independence. This feedback included requests for clarification on when or why the Minister may direct the Board or the Governor might remove members.

Feedback received	Response
Board continuation	
Support for the capability of the Board to be sued.	Noted. This is consistent with the current Act.
Board name	
Board name change supported.	Noted.
Simplify Board name and align with naming conventions used in other jurisdictions.	The change in Board name reflects its regulatory functions and was informed by previous consultation which showed 61% of respondents supported a change in the Board's name to better reflect these functions.
Board membership	
Support for the proposed Board composition.	Noted.
Recommendation to include a veterinary nurse or veterinary technician on the Board.	The Bill does not provide for a veterinary nurse or technician member of the Board. Should the Board require the expertise of veterinary nurses/technicians, it may establish a committee and appoint people with the relevant knowledge and experience to fulfil such requirements.
Recommendation to include other skills, knowledge and experience within the veterinarian members of the Board including, for example: <ul style="list-style-type: none"> a veterinary graduate member experience in equine or performance animal practice experience in shelter medicine or enforcement of the <i>Animal Welfare Act 1985</i> experience providing veterinary services to large livestock producers in rural and remote Australia representation from rural and metropolitan practices 	<p>The veterinarian skills, knowledge and experience of the Board has been carefully considered to ensure representation across the diversity of the profession as far as practicable. Further prescribing skill sets, particularly where these may be specialised, could result in an insufficient pool of veterinarians from which to recruit a member.</p> <p>The Bill does not preclude members with certain specialist experience or skills from being members of the Board, provided the Board can collectively meet the skills, knowledge and experience required (clause 6(2)). The Bill also contains flexibility for the Minister to appoint one veterinarian member with skills, knowledge and experience in addition to those listed to enable effective delivery of functions (clause 6(2)(f)). Alternatively, the Board could seek specialist advice</p>

	through a committee (clause 16) or if needed, by engaging a consultant.
The balance of veterinary skills required may not need to include specialists.	Proposed composition does not specify a veterinarian member that is a specialist. However, a specialist veterinarian is not precluded from being a member of the Board.
Clarification sought – if the intent is for skills of the six veterinarian members to collectively satisfy the list of required skills and expertise.	The skills composition of the veterinarian members provided in clause 6(2) is intended to be collective. This is to aid flexibility in recruiting members.
Remove requirement for a veterinarian member to possess ‘management or governance’ skills. The vet-related skills/expertise should be industry specific as this could be dealt with via policy or other means.	Management or governance skills are crucial as it is intended that this veterinarian member be appointed as Chair.
Proposed approach for Board composition: 4 veterinarians, 2 lay members and 1 veterinary nurse or veterinary technician.	The composition proposed by the Bill (clause 6(1)) remains unchanged from the draft Bill that was consulted on. This composition has been carefully considered to include the sufficient and appropriate breadth of skills, knowledge and experience to fulfil Board responsibilities and to cover the diversity that exists within the profession in regard to employment type, location and other demographic factors.
Proposed number of Board members is excessive.	Nine members is considered sufficient to fulfil Board responsibilities, ensure appropriate skills and experience on the Board and provide flexibility to avoid conflicts of interest where and if these arise.
Proposed Board composition includes too many veterinarian members.	Six veterinarian members is considered sufficient to fulfil Board responsibilities and appropriate to encompass the diversity that exists within the veterinary profession in regard to specialties, location, employment status and other demographic factors, to ensure wide breadth of knowledge.
Suggestion for at least one non-veterinarian to have experience in animal welfare or biosecurity.	The Bill allows for flexibility in appointment of one non-veterinarian member with skills, knowledge and experience that the Minister considers appropriate (clause 6(1)(b)(iii)). Should the Minister consider it appropriate, this member could have experience in animal welfare or biosecurity, subject to the requirements of clause 6(3) .
Suggestion that a legal practitioner is not necessary to be a member of the Board if a senior Departmental veterinarian is appointed as Chair and can access legal advice from the state solicitor as required.	A legal practitioner member of the Board is considered essential and is standard practice for many Boards, particularly those with similar regulatory functions.
Comment that legal guidance should be from a member who is a suitably qualified legal practitioner.	The Bill provides that one Board member must be a legal practitioner meaning a person admitted and enrolled as a practitioner of the Supreme Court of South Australia (clause 6(1)(b)(i) and , clause 3(1) “legal practitioner”).
Increase number of non-veterinarian members with appropriate skills as determined by the Minister under draft Bill 6(1)(b)(iii) to allow for greater flexibility to address any skills gaps or emerging issues.	The Bill contains flexibility for one non-veterinarian member with appropriate skills as determined by the Minister (clause 6(1)(b)(iii)). The composition of the Board as outlined in the Bill is considered to provide the essential skills required for its effective operation and enable flexibility to address skills gaps and emerging issues.
Include a clause that requires the Minister to consult with the AVA on all veterinarian appointments to the Board.	Consultation with the AVA regarding veterinary appointments to the Board has not been explicitly provided for in the Bill, but is also not precluded. If considered appropriate, such consultation may be accommodated through the policies and procedures that support member recruitment.
With 9 members, it would be reasonable to have the minimum gender requirements as 2 male, 2 female.	The Bill has been changed so that minimum gender requirements reflect that at least 2 Board members

	must be women and at least 2 must be men (clause 6(5)).
Concern relating to the ability for ideological influencers to become active on the Board.	The Bill prescribes a skills-based Board composition (clause 6). The Bill will also give the Governor power to remove a member of the Board from office (clause 7(3)).
Member recruitment and appointment	
Who will advise the Minister on the appropriate appointment of Board members.	The Minister may seek advice from whomever they wish. Typically, advice is provided by the administrative unit of the Public Service that is responsible for assisting a Minister in the administration of the Act. This advice is provided consistent with any Department of the Premier and Cabinet policies and guidelines as available at: www.dpc.sa.gov.au/responsibilities/boards-and-committees/resources-and-publications
Lay members of the Board members to be appointed following a public call for nominations.	Board recruitment processes are based on Department of the Premier and Cabinet policies and guidelines as above.
Veterinarian members should be selected by the Minister from a list of preferred candidates following election by registered veterinarians	The election of veterinarian Board members is not proposed in the Bill given this does not represent best practice merit-based selection of a skills-based Board. Board recruitment process are based on Department of Premier and Cabinet policies and guidelines as above.
Presiding member / Chair	
Presiding member title should be changed to "chair".	The Bill has been changed so that the presiding member of the Board will now be referred to as 'Chair' of the Board.
Support for the presiding member to be a registered veterinarian.	Noted. The Bill provides that the Chair must be a veterinarian member with management or governance skills unless the Minister considers it is appropriate to appoint another member as Chair (clause 6(4)).
Presiding member should be independent of the profession and selected for leadership abilities, preferably a legal practitioner.	Providing for a veterinarian to chair the Board recognises that a strong understanding of the profession, including the challenges and practicalities associated with veterinary practice, would support the Chair's role in providing leadership to the Board and the profession. It also supports national consistency and consistency with other professional regulatory bodies. Enabling a veterinarian Chair has been supported through consultation feedback. The Bill creates flexibility to enable another member to be appointed as Chair if the Minister considers it more appropriate.
Terms of appointment and remuneration	
3-year term supported.	Noted.
Support for publication of Board appointments.	Noted.
Board succession should be managed through the planned expiration of the terms of one third of the Board members each year.	Noted. This will be considered during implementation.
Suggestion there be an option for re-appointment for one additional term only (a maximum term of 6 years), apart from the Chief Veterinary Officer and the Registrar.	Renewal of terms is optional, based on the member's willingness to continue, the recommendation of the Minister, and reappointment by the Governor. While a maximum consecutive term of 9 years is possible, terms may be concluded earlier.
Request to define "instrument of appointment" as referred to in clause 7(1) of the draft Bill.	An instrument of appointment outlines terms and conditions for appointments, members' duties, responsibilities and obligations, and remuneration as determined by the Governor.

Remuneration of Board members should be accessible via the Board's website.	Certain details regarding remuneration of Board members can be viewed in DPC's Boards and Committees Annual Report (sessional fees) and the Board's Annual Report (annual total Board costs). Both are required to be tabled in Parliament and are available on the South Australian Parliament's website.
Powers of the Minister and Governor in relation to the Board	
Support for the provisions relating to Ministerial direction.	Noted.
Support for the ability of the Governor to remove one or all members of the Board.	Noted.
Support for the Minister's ability to request a report on the Board's exercising of functions.	Noted.
Suggestions for some limitations on the Governor's power to remove a member of the Board (clause 7(3) of draft Bill), such as providing reasons or guidelines for such removal.	<p>The clause remains unchanged in the Bill to ensure there is flexibility for circumstances that may be complex and difficult to predict (clause 7(3)).</p> <p>Although this power is broad, the Governor must act with the advice and consent of Executive Council. This means that before removal of a member was considered by the Governor, the rationale for such removal would require justification to both the Minister and Cabinet.</p>
Powers of the Minister and Governor in relation to the Board (clauses 8, 9 and 16 of the draft Bill) have the potential to undermine the independence of the Board.	<p>These clauses remain in the final Bill with minor changes. There is no intent for the Minister to undermine independence of the Board, but rather to enhance Board accountability.</p> <p>The Board will be subject to the direction and control of the Minister (clause 5(4)) to ensure public interest matters are dealt with appropriately. This power has been limited to maintain the Board's independence on matters relating to a particular person, application, complaint, investigation, proceeding or determining qualifications for veterinary registration. Outside of these limitations, a direction is intended to be consistent with the scope and purpose of the Act.</p> <p>The Minister may request a written report from the Board about the exercise of its functions (clause 15). The Bill also gives the Minister power to direct if they consider the Board has failed to carry out its functions (clause 8). A copy of the direction must be laid before each House of Parliament within 3 sitting days (clause 8(2)).</p> <p>Directions issued by the Minister and the Board's response will be transparent to Parliament through the Board's Annual Report (clause 23).</p> <p>The power to remove all members of the Board is exclusive to the Governor, on the Minister's recommendation (clause 9), and only where the Minister considers the Board has failed to comply with a direction under clause 8. Although this is a significant power, the Governor must act with the advice and consent of Executive Council.</p>
Governance training	
Support for requirement of members to complete governance training.	Noted.

<p>Suggestion that a Government affiliated Registrar of the Board can provide the management and governance structure guidelines.</p>	<p>The content and provider of governance training is a matter for implementation. Nothing in the Bill prevents a member of the Public Service briefing the Board on relevant legislation if this is considered appropriate.</p> <p>For completeness it is relevant to note that the Executive Officer is not intended to be a member of the Public Service (clause 19(2)).</p>
<p>Further clarity requested regarding the need for governance training provisions in the Bill and how the requirement will be implemented and funded.</p>	<p>Governance training will support Board members in carrying out their functions. The Bill has been changed so that further detail regarding the requirements of such training can be further considered and outlined in the regulations (clause 12). The cost of such governance training is intended to be met by the Board.</p>
<p>Exemptions from governance training should only be granted based on previous governance experience or recognised learning.</p>	<p>The Bill has been changed so that further detail regarding the requirements of such training, including exemptions, can be further considered and outlined where relevant in the regulations (clause 12).</p>
<p>Board functions and powers</p>	
<p>Functions of the Board supported as outlined.</p>	<p>Noted.</p>
<p>Support for the function of the Board to provide information and advice to veterinarians and the public.</p>	<p>Noted.</p>
<p>Support for function of the Board to collaborate with interstate counterparts for national consistency.</p>	<p>Noted.</p>
<p>Opposed function of the Board to set minimum standards for premises.</p>	<p>This function (clause 14(1)(f)) is consistent with premises registration requirements outlined in Part 4 of the Bill to ensure all premises that provide veterinary services are fit for their intended purpose and appropriately regulated. Board composition has been considered to ensure the Board has the necessary collective skills, knowledge and expertise to develop the veterinary premise standard and set the minimum standard for compliance.</p>
<p>The Board providing “legal advice” to veterinarians is a conflict of interest, as it is also the Board’s role to prosecute veterinarians.</p>	<p>This feedback is understood to be in relation to the proposed Board function to provide information and advice to veterinarians and the public about relevant legislation, codes of conduct, professional standards and other standards and guidelines prepared or endorsed by the Board (clause 14(1)(i)). This clause enables the Board to assist veterinarians and the public to understand the legislation – not to provide legal advice. It is intended to ensure the Board assists veterinarians to confidently understand the obligations and professional standards expected of them.</p>
<p>Amend the “objects” provision (clause 14 of the draft Bill) to:</p> <ul style="list-style-type: none"> • replace the term “protect” with “promote” • replace “high professional standards” with “minimum professional standards” • include reference to educating the public • include reference to national and international trade requirements 	<p>The objects provision has been reworded to align with and reflect any changes to the long title (clause 14(8)).</p>
<p>Board functions should also provide a transparent and timely update on the progress of a national veterinary registration process.</p>	<p>Board functions outlined in the Bill do not include the suggested provisions because such updates would be the responsibility of the body responsible for progressing such national registration.</p> <p>The Bill does however enable the Board’s potential involvement and collaboration with matters concerning the nation’s veterinary profession and will require the</p>

	Board to communicate any relevant information to veterinarians and the public (clauses 14(i) and (j)).
Suggestion for the Board to be part of the Australasian Veterinary Boards Council (AVBC).	The Bill does not require the Board to be a member of the Australasian Veterinary Boards Council (AVBC) as this is a matter for the Board. The Bill does however enable the Board to take recommendations from the AVBC in recognising courses of education and training (clause 14(3)). The Bill also provides that functions of the Board include conferring and collaborating with other veterinary regulatory authorities to ensure effective national exchange of information and promote consistency in the regulation of veterinarians within Australia (clause 14(1)(j)).
Consultation on proposed codes, standards, and guidelines	
Support for requirement of the Board to consult on proposed codes, standards and guidelines.	Noted.
Recommendation that the AVBC be consulted on preparation of codes, standards, and guidelines.	This is provided for in the Bill via clauses 14(1)(j) and 14(4)(a) . Further consideration of consultation requirements will occur through development of a “scheme determined by the Board and approved by the Minister” (clause 14(4)(a)).
Consider requiring the Board to specifically consult directly with other regulators of the veterinary profession, including controlled substances regulators (e.g. SA Health) and controllers of agricultural/veterinary chemical use (e.g. PIRSA).	
Committee remuneration	
Members of committees should be entitled to remuneration, allowances or expenses as may be determined by the Minister.	A provision has been added to the Bill to clarify that committee remuneration, allowances and expenses (if any), may be determined by the Minister (clause 16(5)).
Board delegations	
Support for the requirement for delegations to be approved by the Minister.	Noted. Delegation provisions in the Bill have been changed to allow for more detailed consideration of functions that may not be delegated or may only be delegated with approval of the Minister. This will be considered during regulation development as such functions will need to be prescribed (clause 17).
Board quorum and procedures	
Stipulate that the quorum of 6 must include at least 3 veterinarian members.	The final Bill includes a quorum requirement of one half of the total number of its members (ignoring any fraction) plus 1 (clause 18(1)). This change has effectively reduced the quorum requirement from 6 to 5. With only 3 non-veterinarian members on the Board, at least 2 veterinarian members would always be required to form a quorum. This is considered sufficient.
Opposed that the Board can make a decision with only one non-veterinarian member present.	The requirement for one non-veterinarian member to be present (clause 18(2)) is consistent with the current <i>Veterinary Practice Act 2003</i> and is considered sufficient.
Remove reference to ‘deputy presiding member’ (clause 19(3) of draft Bill) as one is not provided for under the provisions.	Reference to ‘deputy presiding member’ has been removed. A provision has been included so that should the Chair be absent, the members present must choose one member to chair the meeting (clause 18(3)).

A legal practitioner should be present at any meeting where a decision is made so that decisions are made on the basis of applicable legislation, policy, procedure and process.	The Bill does not prescribe that a legal practitioner must be present for decisions to be made. Where required, legal input to decision making is expected to be managed by the Board in accordance with principles of risk-based decision-making and good governance.
Minutes of Board meetings should be provided when requested rather than must be provided as per clause 19(9) of the draft Bill.	The Bill has been changed so that the Board must provide documentation relating to its functions or operations as the Minister may require from time to time (clause 14(7)).
Board meeting dates should be published on the Board's website.	This is a matter for the Board to consider.
Annual Report	
Annual Reports should be sent to all registrants and made public via the Board's website.	The annual report is required to be tabled in Parliament (clause 23(3)) and is therefore available on the SA Parliament website. The Board also currently publishes annual reports on its website . Nothing in the Bill prevents the report from being distributed further.
Annual reports should contain more information, particularly regarding complaints (number of new and resolved complaints, resolution time frames, number of outstanding complaints).	The annual report is generally consistent with the template provided by the South Australian Government and must incorporate the information outlined in clause 23 . The Bill also provides flexibility for additional information to be prescribed by the regulations (clause 23(2)(d)).
Executive Officer	
Functions of the Executive Officer supported.	Noted.
Retain the title of Registrar in place of Executive Officer to ensure national consistency.	The Executive Officer title more accurately reflects this role, which includes functions that extend beyond establishing and maintaining registers (as outlined in clause 25). This title is also considered contemporary and complementary to the Board's Chair.
Suggestion that the Executive Officer should be a public service member that is competent in the administration of Acts of Parliament, not a lawyer.	Consistent with the <i>Veterinary Practice Act 2003</i> , the Bill reflects the intent that a staff member of the Board is not, as such, a member of the Public Service (clause 19(2)). Consideration of the skills, knowledge and experience of the Executive Officer is a matter for the Board (clause 19(1)).
Concern that the Executive Officer will no longer have power to act independently of the Board. For example, provide interim registration to graduates and veterinarians relocating to SA.	The Executive Officer reports to and is accountable to the Board and carries out the functions assigned to it by or under the Act and by the Board (clause 25). Consistent with the current Act, the Bill provides that the Executive Officer may provisionally register an applicant (clause 28(13-15)).
Executive Officer should not handle complaints by themselves, nor should they take on the Board's oversight functions.	The Bill reflects the intent that the Executive Officer reports to the Board. Where relevant, consideration has been given to the respective roles of the Board and Executive Officer in complaints handling. The Bill has been changed to enable certain complaints to be resolved by the Board (Part 7, Division 3). With these changes, Executive Officer functions (clause 25) now include a function "to

	receive referrals from the Board of certain complaints made about the conduct of veterinarians and to deal with them in accordance with Part 7, Division 3".
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Registration of veterinarians

Summary of feedback received

There was broad support for the changes to the registration of veterinarians that will provide for increased categories of registration in South Australia. This includes support for the ability of the Board to introduce a part-time and non-practising category of registration. Stakeholders recognised the need for a non-practising category of registration for retired veterinarians who may wish to remain within the veterinarian community, assist during emergencies, or provide assistance where relevant during disciplinary proceedings.

Some submissions provided feedback that the expanded flexibility for registration categories may impact on the quality of veterinarians. This feedback included concerns that limited registration may present a risk to the public if a veterinarian is granted registration who does not have the appropriate and necessary skills to be practising.

Stakeholders supported the increased flexibility that the Bill provides in relation to veterinarian registration fees. However, a number of submissions sought clarification on how the changes to the Bill will enable this flexibility to occur. Stakeholders highlighted how high registration fees are in South Australia compared to corresponding jurisdictions and questioned how the new Bill seeks to resolve this issue.

Feedback received	Response
Registration flexibility	
Support for increased flexibility in registration.	Noted.
Primary registration	
Opposed registration prior to degree conferral as quality of veterinarians cannot be ascertained.	Pre-degree conferral registration will not impact on the quality of veterinarians as to be eligible, the educational institution must recognise that the applicant has completed the academic requirements of the qualifications (clause 28(5)). Pre-degree conferral registration will ensure that graduates will be available to enter the workforce upon completion of the academic requirements of their degree and will particularly assist in instances where there may be a delay in an institution's administrative processes for degree conferral or other factors such as COVID-19.
Concern that limited registration may be granted to a person who was trained overseas, does not have necessary qualifications and experience, or who may not be a fit and proper person.	These are matters for Board consideration in granting limited registration. Where required, the Bill enables the Board to place specific conditions on such registrations (clause 28(12)).
Overseas vet registration should be fast tracked to assist in addressing the national and state vet shortage.	This matter is not within the direct scope of the Bill.
Provisions relating to limited registration may create a potential inconsistency with <i>Controlled Substances Act 1984</i> .	The potential inconsistency has been reviewed and agreed in consultation with SA Health that no inconsistency exists.
Concern that provisional registration is enabled. Board should instead meet more often.	The position on provisional registration is unchanged from the <i>Veterinary Practice Act 2003</i> . It is not always practical for the Board to meet more often. Provisional registration may only be granted where the Executive Officer is confident that full registration will be granted by the Board (clause 28(13)).
Clarification requested regarding how compliance with conditions of registration will be monitored	Monitoring and compliance are matters for the Board.

In relation to clause 39(3)(g) of the draft Bill – recommendation to include on the register those veterinarians that may visit the state to volunteer or work in animal welfare emergencies.	Clause 28(11)(g) remains unchanged. Veterinarians visiting the state to volunteer in the event of an emergency are already covered under clause 28(11)(e)(iii) .
Retired / non-practising registration	
Recommendation to create a separate register for retired vets who may wish to practise in community service or on their own animals, assist during emergencies, or to sit as an assessor on relevant Tribunal hearings. Request for separate retiree register to have relevant fee relief.	The Bill provides scope for the Board to control the categories of registration offered by clarifying that registrations need not be tied to the ‘calendar’ year or require payment of an ‘annual’ fee (clause 32(2)). While scope has been provided and may enable consideration of a non-practising or part-time category of registration, these matters are ultimately for the Board to consider.
Deemed registration	
Support for the requirement of interstate veterinarians with deemed registration to provide contact details to the Board.	Noted.
Registration fees	
Support for changes that create flexibility in registration fees, particularly for non-practising veterinarians such as retirees or members on parental leave.	Noted.
Further clarification is required in regard to how the draft Bill enables flexibility in veterinary registration fees including ability to charge pro-rata fees. Suggestion to make registration fees due at other times of the year (e.g., end of financial year, March/April) instead of during Christmas/New Year period.	The Bill provides scope for the Board to control the categories of registration offered by clarifying that registrations need not be tied to the ‘calendar’ year or require payment of an ‘annual’ fee (clause 32(2)). While scope has been provided and may enable consideration of a non-practising or part-time category of registration, these matters are ultimately for the Board to consider.
Suggestion to introduce a limit on registration fees.	Registration fees are a matter for the Board.
Current South Australian veterinary registration fees are excessive compared to other states.	Registration fees are a matter for the Board.
Recommendation to change ‘fee’ to ‘fees’ to allow veterinarians to pay registration in instalments and to enable pro rata fees.	The <i>Legislation Interpretation Act 2021</i> provides that as a general interpretation rule, singular includes plural and vice versa.
Suspension or variation of registration in urgent circumstances	
Support for provisions on suspension of registration or imposition of conditions in urgent circumstances – provided initial investigative processes are thorough, as appropriate.	Noted. Relevant provisions have been reviewed to accommodate feedback regarding expediency. Suspensions will now require a review by the Board every 60 days to confirm they are required, otherwise they will be cancelled (clause 38(3-4)).
Suggestion that additional amendment be made to allow a person to apply to SACAT to review a decision of the Board to suspend registration.	The Bill provides a person may apply to SACAT for a review of the Board’s decision to suspend their registration (clause 87(6)(d)).
General comments on veterinarian registration	
The Board should refer to other registered health professions with excellent processes and resources to support practitioners’ skills maintenance during parental leave and transition back to the workplace.	This is a matter for the Board to consider.
The Board should have an outline of the application process and fees available to veterinarians.	This is a matter for the Board to consider.

Registration of premises

Summary of feedback received

There was broad support from a diverse range of stakeholders for the provision of veterinary premise registration in the Bill. Stakeholders recognised that the registration of all veterinary premises and the introduction of minimum standards will ensure that premises that provide veterinary services are fit for purpose and can provide adequate care.

However, several stakeholders also provided feedback over how mandatory premise registration would impact mobile and telehealth veterinary clinics and queried how these services would be accommodated in a veterinary premises standard. Other submissions provided feedback about the Board being responsible for developing the veterinary premises standard and for approving the registration of premises.

Stakeholders provided several proposals for how to improve or adjust the proposed process for veterinary premise registration and suggested requirements to include in the veterinary premises standard. This included a suggestion to provide exemptions and fee relief for animal shelters, to add a responsible person in relation to the premises to be listed on the premises register, and to add a requirement in the standard for veterinary nurses to be employed at premises.

Feedback received	Response
Support for provisions related to registration of premises.	Noted.
Mobile and telehealth veterinary services	
Questions regarding how mobile/telehealth veterinary services will be accommodated in a veterinary premises standard.	Careful consideration has been given to the growing mobile and telehealth veterinary services sector to enable these important services to continue. Mobile/telehealth veterinary services are enabled in the Bill under clauses 50(2)(b), 50(2)(c), and 51(3)(a) . Under these provisions, the offence to provide veterinary services or carry on a veterinary business at premises other than registered premises does not apply in certain circumstances. These circumstances include those that describe the nature of mobile and telehealth veterinary services with further scope to prescribe other circumstances by regulation (clause 50(2)(f) and clause 51(3)(c)).
Conflict of interest	
Potential conflict of interest regarding the Board's role of registering premises that align with minimum standards and the role of investigating complaints. Suggestion that the Board may implicate themselves if in the process of investigating a complaint, a premises is found to have not maintained minimum standards.	It is the duty of the responsible person in respect of the premises to ensure that minimum standards are maintained, not the Board.
Veterinary premises register	
Suggestion to include the name of a person deemed responsible for a veterinary premise on the register.	The Bill has been changed to require a 'responsible person in respect of each registered premises' (clause 41) and to require the name of such person to be listed on the veterinary premises register (clause 39(3)(e)).
Suggestion to reinstate the inclusion of veterinary services providers in the Bill to recognise cases where companies or body corporates own veterinary clinics.	Reference to veterinary services providers has not been reinstated in the Bill. However, where relevant, the Bill provides for a 'responsible persons in respect of registered premises', 'employer of a veterinarian' and contemplates certain offences applying to individuals and body corporates (clause 51).
Recommendation for further consultation on the Bill to include wildlife rescue organisations and companion	Wildlife and companion animal rescue organisations were included as stakeholders in this review process and invited to provide submissions.

animal rescue organisations that may have been developing their facilities to provide veterinary care.	
Veterinary premises standard	
Recommendation that registered premises must employ qualified veterinary nurses and/or technicians in veterinary nursing positions.	The veterinary premises standard is intended to focus on a premises' physical requirements, however this is ultimately a matter for Board consideration in development of the veterinary premises standard.
Suggestion that the premises standard should focus on hospital physical attributes rather than business processes.	
Recommendation to consider potential regulatory duplication between the veterinary premises standard and Code of Practice for the Storage and Transport of Drugs of Dependence.	This is a matter for Board consideration, in consultation with SA Health as required.
Exemptions from premise registration should be considered for animal shelters where veterinarians are employed on a full-time basis at the facility.	This is a matter for implementation. The Bill provides flexibility for this to be addressed in various ways, including via regulation or exemption.
Suggestion to consider providing legal effect to the veterinary premises standard through reference in regulations to ensure minimum requirements are enforceable.	<p>The Bill provides that premises are only eligible for registration if the Board is satisfied that the premises meet minimum requirements (clause 42(1)).</p> <p>Further to this, legal effect to comply with the premise standard is met in the Bill through the penalties for failure to comply with conditions of registration (clause 47) and failure to inform the Board of changes to the information required to be on the premise register (clause 48).</p> <p>The Bill also provides flexibility for the Board to decide how audit and inspection of premises may be undertaken. This is supported by the Board's power to suspend or cancel the registration for a number of reasons, including if the registered premises do not meet the minimum requirements in the veterinary premises standard (or requirements of a scheme approved by the Board) (clause 43).</p>
The guidelines for the accreditation scheme for the registration of premises should be made available to the public prior to the Bill passing.	<p>Preparation (or endorsement) of the veterinary premises standard will be considered following passage of the Bill through Parliament.</p> <p>The Bill also provides that in preparing or endorsing the veterinary premises standard, the Board is required to consult on the proposed standard in accordance with a scheme approved by the Minister, cause a copy of the standard to be published in the Gazette and on a website, review and update the standard at least once every 5 years, and advise all veterinarians of the new or updated standard (clause 14(4)).</p>
Accreditation scheme used by Board should be a pre-existing professional accreditation scheme so the Board won't need to unnecessarily expend its resources.	<p>The Bill provides this flexibility via:</p> <ul style="list-style-type: none"> • clause 40 which, as an alternative to preparing a standard, enables the Board to endorse standards relating to minimum requirements for registered premises • clause 42(1)(a) which provides that premises are eligible for registration if the Board is satisfied that premises meet the requirements of a scheme approved by the Board as an alternative to meeting minimum requirements for premises of the relevant kind in the veterinary premises standard. <p>While the Bill provides this flexibility, the scheme used is ultimately a matter for the Board to consider.</p>

<p>Boards should be allowed to decide how they audit and inspect practices so that the cost of inspection is not a limiting factor.</p> <p>For example, the following should be considered:</p> <ul style="list-style-type: none"> • inspections when applying to open premises • inspections every 3 or 5 years • self-inspection lists sent out in intervening years • inspection when a complaint is received. 	<p>Flexibility for the Board to decide how audit and inspection of premises may be undertaken has been a key consideration in development of the Bill.</p> <p>In particular, the following scenarios have been tested, with the Bill providing flexibility for these to occur should the Board wish:</p> <ul style="list-style-type: none"> • inspections when applying to open premises (clause 42(3)(c)) • inspections every 3 or 5 years (clause 42(3)(c) – noting that a new registration (and inspection if required) will be required at least once every 3 years under clause 42(4)) • self-inspection lists sent out in intervening years - this is not precluded and could be specified in regulations should it be required (clause 99(2)) • inspection when a complaint is received (clause 84). <p>Further consideration regarding inspection and audit of premises for the purposes of premises registration is a matter for the Board.</p>
Removal of premises from the register	
<p>Premises that have been removed from register should be posted on a website for the public to see.</p>	<p>The Bill requires the Executive Officer of the Board to keep a register of premises that have been removed from the veterinary premises register (clause 39(1)(b)) and provides that a copy of the registers must be published on a website determined by the Board (clause 39(4)).</p>
Premise registration application	
<p>The Board should be given the power to waive fees for premises registration applications.</p>	<p>The Bill provides the Board with a general power to waive fees as prescribed by regulations (clause 99(6)).</p>

Offences

Summary of feedback received

Feedback demonstrated support for the offences in the Bill that prohibit people from falsely holding themselves out as a veterinarian or from using certain titles that indicate they are a registered veterinarian. However, there were also suggestions from stakeholders to expand and strengthen these offences to capture more people who may mislead the public and pretend to be a veterinarian.

A number of submissions sought clarity on the offence relating to the provision of veterinary services for “fee or reward” by persons who are not veterinarians. Submissions cited confusion over what constituted “fee or reward” and included requests to define the term. Stakeholders queried if the offence indicates that the Bill only applies to veterinary services that are performed for “fee or reward” and thereby excludes services that are not performed for “fee or reward”.

In addition, some consumers provided suggestions for creating additional offences relating to veterinary practice.

A small number of stakeholders expressed concern over the proposed “undue influence” offence. Stakeholders stated that applying the offence to “a person” was too broad and could have unintended consequences.

Feedback received	Response
Veterinary services to be provided by veterinarians	
Request to define fee or reward in the Bill for clarity.	The Bill has been changed to replace all references to ‘fee or reward’ with ‘money or other consideration’. Further defining ‘money or other consideration’ could have unintended consequences.
Clarification sought if the proposed Bill will prohibit a person from providing a ‘veterinary service’ where there is no expectation of fee or reward, even if they don’t pretend to be a veterinarian.	The Bill will not prohibit non-veterinarians from performing veterinary services provided they are not performing them for money or other consideration, and they are not falsely holding themselves out as a veterinarian. The provisions of other legislation such as <i>Animal Welfare Act 1985</i> and <i>Controlled Substances Act 1984</i> may apply in such circumstances.
Request that animal care officers at welfare organisations be given exemptions from offence provision to provide certain acts of veterinary services.	The Bill provides an ability to disapply the offence in prescribed circumstances (clause 49(2)) and a general power of exemption (clause 89). Further consideration of such an exemption is a matter for further consideration during the implementation process.
Clarification sought in the wording of clause 64(2)(a) in the draft Bill, whereby the offence to provide veterinary services for fee or reward does not apply in relation to ‘ <i>veterinary services provided by an employee of the owner of the animal in the course of that employment</i> ’. Suggestion that this should not extend beyond the exemption in the current Act.	This provision is unchanged from the <i>Veterinary Practice Act 2003</i> and intends to ensure persons such as farmhands (who receive fee or reward in the form of wages) can provide certain services to animals in their care as permitted by the owner e.g., treating a cow for milk fever (clause 49(2)(a)).
Providing veterinary services at a registered premises	
Support for veterinary services to only be provided at registered premises, on the understanding that veterinary services will still be permitted to be provided under ‘certain specified circumstances’ such as in emergencies, on a farm, from out of an appropriately equipped vehicle used by roaming veterinarians, etc.	The scenarios raised were considered in development of the Bill and informed the drafting of clause 50(2) which lists circumstances where the offence to provide veterinary services unless at a registered premises does not apply. The Bill also provides scope to further define additional circumstances where required (clause 50(2)(f)).
Suggestion to reword clause 71(2)(c) of the draft Bill to clearly state that veterinary services can be provided at the premises where the animal is housed for the benefit of the very common farm and house visits.	The clause has been reworded to clarify that veterinary services may be provided by a veterinarian at premises owned or occupied by the owner or person in

	control of the animal with the permission of that person (clause 50(2)(c)).
Consideration should be given to instances where veterinarians volunteer at registered charities that may be in private residences.	Veterinarians providing veterinary services (whether volunteering or not) must do so at registered premises (clause 50(1)); however, clause 50(2) provides several circumstances where this requirement does not apply, including <i>'if the veterinary services are provided at premises owned or occupied by the owner, or person in control, of the relevant animal with the permission of that person'</i> (clause 50(2)(c)).
Consideration should be given to veterinarians volunteering in the field, e.g., SAVEM activated during a bushfire emergency is licensed by SA Health to possess and administer controlled substances in temporary field hospitals (no premises specified) under strict conditions.	Further to the above, the Bill enables veterinarians to provide veterinary services at premises other than registered premises <i>'if the veterinary services are provided in an emergency, or if it is impractical or dangerous to move the relevant animal'</i> (clause 50(2)(d)).
Consideration should be made regarding the delivery of veterinary services in remote Aboriginal and Indigenous communities (particularly routine surgical desexing of companion animals) where the facilities for a veterinary premises are limited or non-existent.	The Bill enables veterinarians to provide veterinary services at premises other than registered premises in certain circumstances, with flexibility to prescribe other circumstances by the regulations (clause 50(2)). The Minister may also exempt a person or persons of a specified class from a provision(s) of the Bill (clause 89).
Illegal holding out	
Support for prohibition of use of certain titles and descriptions.	Noted.
Illegal holding out provisions should be clarified and strengthened to avoid ambiguity as to the types of actions that may be considered as holding out.	Further defining 'holding out' in the Bill could result in narrowing the definition and limiting the actions that could be classified as holding out. The relevant clauses from the draft Bill remain in the final Bill with minor revisions (clause 57, 58 and 59).
Extend the prohibition to include the use of the term "doctor" where a person who holds a doctorate but is not a registered veterinarian intends to use the term to mislead the public.	The Bill provides scope to prescribe any other word or expression by regulation (clause 60(3)(c)) should this be necessary. Depending on the circumstances, clause 57 may also apply in the scenario described.
Undue influence	
Provisions on undue influence supported.	Noted.
The use of the term 'a person', as used under clause 72 of the draft Bill, is too broad and could hinder an animal owner from having free will over what treatment a veterinarian performs on their animal. Requires re-wording to clarify its intent. Clarification sought on what 'undue influence' is.	The Bill retains the provision relating to undue influence (clause 53) and has added a provision relating to improper directions (clause 55) so that these provisions more closely reflect similar provisions in Section 51 of the existing <i>Veterinary Practice Act 2003</i> . The Bill has also been changed (clause 53) to clarify and limit the application of these clauses to: <ul style="list-style-type: none"> • an employer of a veterinarian • a director, officer or employee of the employer of a veterinarian • a person for or on behalf of whom a veterinarian provides veterinary services pursuant to a contract for services or other arrangement • a veterinarian • any other person, or person of a class, prescribed by the regulations Clarification has also been included that the clauses do not apply to a person merely because the person is the

	owner, or has control, of an animal in relation to which a veterinarian provides veterinary services (clause 53(2)).
General comments	
Support for provisions on offences.	Noted.
Suggestion to create an offence to hold animals/pets hostage for payment.	<p>The Bill does not make it an offence to hold animals/pets hostage for payment.</p> <p>Fee disputes are a typically a private matter between the veterinarian and consumer and therefore outside of the scope of the Bill. Where a fee dispute constitutes unprofessional conduct as defined by clause 3(1), a complaint may be made in accordance with Part 7, Division 2.</p> <p>Alternatively, the Bill does not preclude a consumer from lodging a civil dispute against the veterinarian.</p>
<p>Where a veterinarian is found to have caused the death of an animal, consumers should be reimbursed for veterinary costs.</p> <p>Where a veterinarian is found to have caused injury to an animal, the veterinarian should be liable for all future costs in treating the injury.</p>	<p>Settlement of civil matters are outside the scope of the Bill. The Bill however requires veterinarians hold insurance against civil liability incurred in the course of providing veterinary services (clause 52(1)).</p>

Medical fitness

Summary of feedback received

Feedback on the medical fitness provisions in the Bill came from two veterinary stakeholders. One stakeholder raised concern over the ability of the Board to request a 'medically-invasive procedure' and requested a clearer definition of 'medically unfit' due to feedback that the term was too broad.

The second stakeholder raised feedback regarding the obligation for health professionals and responsible persons to report medical unfitness of a veterinarian. The submission stated that this may impact doctor-patient confidentiality and have unintended consequences of preventing a veterinarian from seeking medical advice where needed.

Feedback received	Response
Suggestion that the health professional specified by the Board to conduct an examination should be agreed to by the veterinarian.	<p>This clause of the Bill is consistent with Section 20 of the existing <i>Veterinary Practice Act 2003</i> and supports the intent that registered veterinarians are medically fit to provide veterinary services (clause 21(1)(a)).</p> <p>It is important that the health professional conducting a medical examination is independent from both the Board and the person applying for registration or reinstatement to ensure that the medical opinion is unbiased.</p>
The Board do not have the medical knowledge or qualifications to be requesting an invasive medical examination. A medical certificate to prove medical fitness should suffice.	This clause of the Bill is consistent with Section 20 of the existing <i>Veterinary Practice Act 2003</i> and supports the intent that registered veterinarians are medically fit to practice (clause 21).
Confusion regarding what is meant by 'costs' under clause 25 of the draft Bill for consultation.	The only proceedings now heard and determined by the Board are in relation to medical fitness. On review, this clause (clause 25 of the draft Bill) has been removed.
Obligation to report medical unfitness of a veterinarian may require a health professional to breach confidentiality and may also have unintended consequences by causing a veterinarian to delay or avoid treatment.	<p>The intent of this provision is to ensure that veterinarians can competently provide veterinary services personally to an animal without endangering the animal's health, safety or welfare.</p> <p>The obligation for a health professional to report medical unfitness (clause 62(1)(a)) is consistent with the existing <i>Veterinary Practice Act 2003</i>.</p> <p>Health professionals would only be required to report medical unfitness when a veterinarian is a risk to an animal's health, safety or welfare. Disclosure of this information is also supported by Section 99(2) of the <i>South Australian Public Health Act 2011</i> which authorises a person to disclose personal information in a range of circumstances including as required by law.</p>
The obligation for a 'responsible person in relation to premises' to report medical unfitness of a veterinarian could potentially be abused by an employee and used against a veterinarian.	<p>The intent of this provision is to ensure that veterinarians can competently provide veterinary services personally to an animal without endangering the animal's health, safety or welfare.</p> <p>The obligation for 'a responsible person in respect of registered premises' to report medical unfitness (clause 62(1)(c)) does not fall to any employee, but rather the responsible person as defined by clause 41.</p>

	<p>It was also considered appropriate that an employer of a veterinarian should have an obligation to report medical unfitness. This has now been added to the Bill (clause 62(1)(b)).</p>
<p>Request for more clarity regarding the definition of medical unfitness.</p>	<p>Medical unfitness is intended to be specifically in regard to whether the veterinarian can provide veterinary services personally to an animal without endangering the animal's health, safety or welfare (clause 61).</p> <p>The added Board function of providing information and advice to veterinarians and the public (clause 14(1)(h)) could potentially be utilised by the Board to provide more guidance and clarity on what is considered to be medically unfit.</p>
<p>Recommendation to adjust the time frame requirement for the Board to retain any relevant records to 3-5 years rather than any time the Board thinks fit.</p>	<p>This provision is consistent with the existing <i>Veterinary Practice Act 2003</i>. The Board can create policy regarding records management given their collective skills, knowledge and experience.</p>

Complaints, investigations and proceedings

Summary of feedback received

The complaints and investigations provisions in the Bill received broad feedback from a range of stakeholders, particularly consumers and veterinarians. There was support for the addition of provisions to add clarity and transparency to the complaints process, the detail of which is currently silent in the *Veterinary Practice Act 2003*.

Consumers provided feedback about the Board being the entry point for receiving and assessing complaints against veterinarians. Several submissions suggested that this could represent a potential conflict of interest due to the composition of the Board being predominantly veterinarians. There were also questions raised as to who bears the cost of complaints, with some veterinarian stakeholders suggesting that there should be a fee charged for lodging a complaint.

There were further suggestions in relation to the complaints process. These included improving the accessibility avenues for lodging complaints, removing the ability for anonymous complaints to be received, and providing for a pathway of mediation between both parties. There were several submissions from both veterinarians and consumers that requested there be predetermined time frames for addressing complaints to ensure they are dealt with in a timely manner, and support for keeping both parties informed of the process to resolve complaints made.

Feedback was also received in relation to investigations and the Tribunal process as outlined in the Bill. Some stakeholders questioned the Minister's power to develop the guidelines for investigations, provided suggestions for how investigations should be conducted, and questioned whether it would be feasible to source the panel of assessors as required for Tribunal disciplinary proceedings.

Several consumers provided feedback on the removal of the ability for a person to lodge a complaint directly with the Tribunal with some concerns that the avenues for consumers to make complaints regarding veterinarians would be limited to the Board.

Feedback received	Response
Support for provisions to address the complaints process being outlined in the Bill.	Noted.
Processes for making complaints	
There should a separate body responsible for receiving and examining complaints from the public.	The Board is the appropriate body to receive complaints about veterinarians and is considered to have the appropriate skills, knowledge and experience required to assess these complaints.
Anonymous complaints should be enabled.	The Bill has been changed so that information about how complaints may be made will be required to be set out in the administrative processes for receiving and handling complaints received about the conduct of veterinarians (clause 67). How complaints may be made, including the anonymity of complainants (or otherwise), will now be a matter for the Board to consider in the establishment of administrative processes as required under clause 67 .
Anonymous complaints should not be enabled.	
Methods for lodging complaints should be accessible and cater to the diverse composition of our communities.	
Costs associated with complaints process	
Clarification required as to who bears the cost of complaints process and suggestion that complainants should pay a fee to lodge a complaint.	The Board bears the cost of the complaints process. This is appropriate because the complaint process safeguards the integrity of the profession.
Opposes any intention to prescribe a fee for lodging a complaint with the Board. This would further disincentivise consumers from making a complaint.	The Bill contains a number of provisions intended to assist in managing costs in relation to the complaints process. These include the power to dismiss certain complaints (clause 70), the power to take no further action (clause 71) and provisions that enable certain

	<p>complaints to be resolved by the Board (Part 7, Division 3)</p> <p>The Bill does not contemplate payment of a fee by complainants as a condition precedent to making a complaint.</p>
Processes for dealing with complaints	
Support for the requirement to keep complainants and veterinarians informed of the process.	Noted.
Potential for the Board to abuse the provision that enables the Board on its own initiative, to treat as a complaint any matters concerning the conduct of a veterinarian (clause 74(3) of the draft Bill).	<p>From time to time, the Board may become aware of matters that are in the interests of animal health, safety and welfare and the public, and these matters should be afforded the same processes as if they had been identified by an aggrieved person. Providing for the Board to treat such matters in accordance with the complaints process (clause 68(2)) offers transparency.</p> <p>Note that the <i>Public Sector (Honesty and Accountability) Act 1995</i> applies to the Board, including the duty to exercise care and diligence and the duty to act honestly.</p>
Predetermined time frames for the complaints process should be developed and communicated to complainants and veterinarians.	<p>The Bill requires that the administrative processes for handling complaints “must ensure that complaints are dealt with in a timely and efficient manner” (clause 67(2)(b)) and “set out the time frames within which complaints are expected to be dealt with” (clause 67(2)(c)).</p> <p>Any further specification of timeframes is a matter for the Board to consider in the establishment of administrative processes as required under clause 67.</p>
Suggestion to consider an online portal whereby participants can monitor case progress.	This is a matter for the Board to consider in the development of the administrative processes for complaints and any supporting systems.
Concerns regarding conflict of interest in the Board conducting preliminary examinations (assessment) of complaints given the Board comprises majority veterinarian members and it may make decisions regarding complaints without a legal practitioner being present.	<p>The Bill reflects a policy position that the Board is the appropriate body to receive and handle complaints in the first instance because the Board has the collective skills, knowledge and experience necessary to understand the professional complexities and circumstances.</p> <p>Clause 20(2) stipulates that no member of the Board or a committee of the Board will have a direct or indirect interest in a matter by reason of having a shared common interest with veterinarians.</p> <p>In instances where a member may identify a personal conflict of interest in a complaint made to the Board, the Board is expected to act in accordance with the <i>Public Sector (Honesty and Accountability) Act 1995</i>.</p>
Veterinarians’ registration should have conditions placed on it while the Board are examining complaints.	<p>The Bill provides for the Board to suspend or vary a veterinarian’s registration in urgent circumstances where the veterinarian has been charged with a prescribed offence or reasonably suspects that the veterinarian poses an unacceptable risk to animals (clause 38).</p> <p>The Bill also enables the Tribunal to order that the registration of a veterinarian be suspended pending the outcome of disciplinary proceedings against the veterinarian (clause 78(9)).</p>

Veterinary practices should have processes in place to ensure that clients are aware of how to address complaints with their practice.	Guidance for clients on grievance and complaint procedures within practices is a matter for individual businesses to consider.
Two-tier system for complaint resolution	
<p>Suggestion that the Bill introduce a two-tier system of handling complaints, whereby matters of a less serious nature (unsatisfactory professional conduct) are handled by the Board and the more serious matters (unprofessional conduct) are referred to the Tribunal. The lower tier matters handled by the Board should focus on correcting the conduct rather than punishment.</p>	<p>Changes have been made to the Bill that will enable certain complaints to be resolved by the Board (Part 7, Division 3).</p> <p>The kinds of complaints and conduct that may be resolved by the Board, along with the procedures for dealing with these matters are to be specified by regulation (clause 73) and further determined by the Board after consultation with the Minister (clause 72).</p> <p>The intent is to, where appropriate, avoid formal disciplinary proceedings by dealing with a complaint through education and improving the future conduct of the veterinarian concerned. Board resolution of matters is also intended to be conducted as expeditiously as possible and without undue formality.</p> <p>Under the Division:</p> <ul style="list-style-type: none"> • the Board will cause matters to be referred to the Executive Officer for resolution (clause 74(1)) • Where relevant, the Executive Officer must attempt to resolve the matter by way of conciliation (clause 74(5)) • the Board will have power to accept an undertaking made by the veterinarian, issue a reprimand, provide the veterinarian with counselling, require the veterinarian to undertake specified remedial education or training or impose conditions on the veterinarian's registration (clause 74(6-10)). Other actions may be prescribed by regulation. • The Executive Officer will have a duty with respect to conflict of interest (clause 75) • The Board will be required to monitor and review complaints dealt with under this Division with a view to maintaining proper and consistent practices (clause 76) <p>The Bill provides for the Board to lodge a complaint with the Tribunal (clause 78(1)(a)) should the subject matter of the complaint be of a more serious nature, where an allegation is not admitted in accordance with the requirements set out in regulations (clause 74(4)), or for any reason the Board thinks fit (clause 74(2)).</p>
Conciliation	
Suggestion that the Board should mediate rather than pursue legal action.	The Bill has been changed to provide for conciliation as a pathway to resolving certain complaints (clause 74(5)).
There should be a requirement for the complainant to have made "reasonable and documented efforts" to address and settle the complaint with the veterinarian before the complaint is taken to the Board.	<p>Private attempts to resolve a complaint are not precluded in the Bill, noting that it may not be appropriate in all circumstances for this to occur and that some complainants may feel uncomfortable complaining directly to their veterinarian.</p> <p>The Bill has also been changed to provide for conciliation as a pathway to resolving certain complaints where this would be of benefit and the</p>

	complainant and veterinarian agree to this approach (clause 74(5)).
Dismissal of complaints	
Decision to dismiss a complaint should be made by a legal practitioner.	The legal practitioner Board member contributes legal expertise to support the functions of the Board but is not intended to preside over cases. The Board's collective skills, knowledge and experience are considered sufficient for the Board to make determinations on the appropriate dismissal of complaints.
Request that complaints must be dismissed if they are genuinely vexatious and a nuisance.	Clause 70(1)(b) states that the Board must dismiss a complaint if it is of the opinion that the matter raised in the complaint is trivial, frivolous, vexatious or not made in good faith.
Proposal that consideration be given to dismissing complaints lodged during the time period when the complainant is being investigated or prosecuted by RSPCA South Australia.	Complaints must be handled on merit in accordance with the Bill and the administrative processes as developed by the Board (clause 67).
The veterinarian against whom the complaint has been made should also be informed that the case has been dismissed.	The Bill has been changed so that further information about notification of veterinarians and complainants will now be set out in the administrative processes for receiving and handling complaints received about the conduct of veterinarians (clause 67). In particular, this clause provides that the administrative processes must contain provisions relating to notifying veterinarians and complainants of receipt of complaints, the steps taken by the Board in response to complaints and the outcome of complaints. The clause also enables provisions setting out when such notifications need not be given. Further consideration of this will be a matter for the Board in development of the administrative processes, noting that there may be some instances (particularly where the complaint is frivolous, vexatious or trivial) where notifying the veterinarian may cause undue stress.
Investigation of complaints	
Support for the Board to further investigate using appointed inspectors following a preliminary examination (assessment).	Noted.
Following notification of a complaint, fair warning of an investigation should be given by the Executive Officer and within business hours.	The Bill does not preclude notification prior to an investigation where appropriate. There are however instances where no notice or immediate action may be required and the Bill contains appropriate provisions to enable this (such as the powers of inspectors outlined in clause 85). Further information about the conduct of investigations and inspections must be published by the Board on a website (clause 82).
Giving Minister the power to make guidelines for investigations undermines the independence of the Board and makes it vulnerable to political strategies of different parties.	The Bill has been changed so that responsibility for development and publication of guidelines about the conduct of investigations and inspections will now fall to the Board, not the Minister (clause 82).
The Ministerial Guidelines in relation to complaints should be made available to the public prior to the Bill passing.	Responsibility for developing investigation guidelines has been changed from the Minister to the Board (clause 82). Development of these guidelines will be undertaken once the Bill has passed Parliament.

Inspectors and inspections	
Inspectors should be sought relevant to the type of area (city, rural etc.) they are inspecting.	Noted. This is a matter for the Board to consider in implementation.
Inspectors must not have a conflict of interest with the owner of/veterinarian at the premises being inspected.	Inspectors for the purposes of the Bill are held accountable under the <i>Public Sector (Honesty and Accountability) Act 1995</i> . Section 30 of this Act stipulates that persons performing contract work for a public sector agency or the Crown must disclose in writing any potential conflict of interest to the relevant agency.
In relation to draft Bill clause 82(3)(a) – “Inspection can only be authorised as a result of a complaint as in [draft Bill] Section 74(2) and on a specific day”.	Inspection of premises are required for more matters than the investigation of complaints about the conduct of veterinarians (clause 68). Under the Bill, inspector functions include conducting investigations for the purposes of the Act (including in relation to disciplinary proceedings and proceedings relating to the medical fitness of veterinarians), inspecting premises, places or vehicles to ascertain whether there has been a contravention of the Act and inspecting registered premises to ascertain whether the registered premises meet the minimum requirements in the veterinary premises standard (clause 84).
Bribery should be added to offences by inspectors.	On review, the clause listing offences by inspectors (clause 84 of the draft Bill) has been removed from the Bill in recognition that: <ul style="list-style-type: none"> the <i>Public Sector (Honesty and Accountability) Act 1995</i> applies to inspectors should a decision of an inspector be in question, a review of an inspector’s decision could be sought.
Lodgement of complaints with Tribunal	
Support for removing the ability for the Executive Officer to lodge complaints with SACAT.	Noted.
Support for removal of SACAT as an entry point for consumers to lodge complaints.	Noted.
There is a risk of legal costs increasing due to the use of SACAT for all disciplinary matters.	The Bill has been changed to provide an avenue for certain complaints to be resolved by the Board (Part 7, Division 3). This aims to ensure that only matters of a more serious nature are referred to the Tribunal.
To simplify process and reduce costs and delays, the Board, not SACAT, should be responsible for imposing disciplinary action.	
Opposed removal of the ability for an aggrieved person to lay a complaint directly before the Tribunal.	The ability for an aggrieved person to lay a complaint directly with the Tribunal under Section 62 of the <i>Veterinary Practice Act 2003</i> has been found to place an unnecessary burden on the Tribunal and on the resources of the Board. Removing this provision and requiring complaints to be made to the Board is expected to: <ul style="list-style-type: none"> reflect that disciplinary proceedings are brought in the public interest and are not strictly inter partes proceedings brought to compensate the aggrieved person ensure complaints are subject to an assessment (clause 69), and if necessary an investigation (clause 77), by the Board before being laid before the Tribunal clarify the allegations being made and ensure that there is proper cause for disciplinary action (clause 66) should the alleged conduct be proven (clause 69) support more efficient Tribunal hearings in terms of time, resourcing and cost.

	Should circumstances warrant, an aggrieved person could initiate private civil proceedings against the veterinarian. Should an aggrieved person be concerned that their complaint has not been handled appropriately by the Board, the person could make a complaint to <u>Ombudsman SA</u> .
Opposed the ability of the Minister to lodge a complaint.	The ability for the Minister to lay a complaint before the Tribunal (clause 78(1)(b)) is consistent with Section 62(1)(b) of the <i>Veterinary Practice Act 2003</i> . The provision is considered a necessary safeguard should the Board be unable to form a quorum (e.g. due to conflict of interest) or otherwise lay the complaint.
Public should be considered in process of disciplinary action against veterinarians e.g., what impact would disciplinary action against a local veterinarian have on the community?	Where there is proper cause (clause 66), pursuing disciplinary action against a veterinarian is in the overall best interests of the public as it assists in maintaining the high standards of competence and professional conduct expected of veterinarians and promotes animal health, safety and welfare.
Questioned whether it is feasible to find panel of assessors with the relevant skills and background in veterinary services to match the composition of the Board. Community of veterinarians in SA is small and it is difficult to find panel that do not have conflicts of interest.	The composition of the Tribunal has been reviewed and changed to enable more flexibility in sourcing a panel of assessors (clause 79). There will now be one panel of veterinarian assessors (clause 79(1)(a)) and one panel of assessors consisting of persons who have expertise that would be of value to the Tribunal who are not veterinarians and who do not work in or have a material interest in any areas relating to veterinary services (clause 79(1)(b)).
The proposal for a panel constituted of four members would result in being the only disciplinary jurisdiction of SACAT which constitutes a panel of four.	Consistent with other disciplinary jurisdictions and the <i>South Australian Civil and Administrative Tribunal Act 2013</i> , the Bill has been changed so that the Tribunal will be constituted of 3 members (clause 79(2)).
Support for proposed changes with the condition that SACAT panel members include a vet with rural and large animal practice experience or that one is seconded to the Tribunal should the need arise.	The Bill has been changed to provide more flexibility to appoint assessors that reflect the nature of complaints received by SACAT. SACAT also have the ability, under Section 22 of the <i>South Australian Civil and Administrative Tribunal Act 2013</i> , to recruit specialist skill sets where required.
Too much power given to the President of the Tribunal and legal profession. Concern that process favours the complainant.	The Bill proposes that unless the President of the Tribunal determines otherwise, the Tribunal will be constituted of 3 members (clause 79(2)), of whom, one will be selected from the panel of assessors who are veterinarians (clause 79(1)(a)). This provision is intended to ensure the expertise and perspective of a veterinarian is represented in Tribunal hearings.
Autopsy	
There should be a provision for an independent autopsy in the case of serious harm causing death.	It is not the role of the Board, nor feasible for the Board, to request autopsies as part of investigating a complaint. Consumers may seek an independent autopsy if they believe it would support their complaint.
Fee disputes	
Bill should include avenue for complaints regarding fee disputes between vets and consumers for veterinary services that have been provided.	Fee disputes are typically a private matter between the veterinarian and consumer and therefore outside of the scope of the Bill. Where a fee dispute constitutes unprofessional conduct as defined by clause 3(1) , a complaint may be made in accordance with Part 7, Division 2 .

Review by Tribunal

Summary of feedback received

The option to seek an external review via SACAT of a Board decision was supported. There was conflicting feedback on the availability of an internal review mechanism within the Tribunal for disciplinary decisions. One consumer stakeholder expressed concern that there is no option for a consumer to seek a review of a Board decision to dismiss a complaint.

Feedback received	Response
No internal review of a decision by Tribunal	
Supported, on the basis that this would be consistent with health professions and an appeal via the Supreme Court is available.	Noted.
There should remain an option for review of Tribunal decisions in relation to disciplinary proceedings.	Reviews of disciplinary decisions by the Tribunal can instead be sought by way of appeal in accordance with Section 71 of the <i>South Australian Civil and Administrative Tribunal Act 2013</i> .
Review by Tribunal	
Support for the ability to seek a review by Tribunal.	Noted.
Clarity sought as to if a review by Tribunal is necessary before a matter may be taken to the Supreme Court.	The nature of the rights available to a person will depend on the circumstances of the matter.
Appeals against Board decisions should still be available by recourse to higher courts such as the District or Supreme Court.	The Bill provides that certain decisions of the Board may be reviewed by the Tribunal (clause 87). For matters that are not a reviewable decision there is no right of review to SACAT and the nature of the rights available to a person will depend on the circumstances of the matter.
Any addition to the scope of reviewable decisions may require further funding to SACAT.	Noted. The funding of work undertaken by SACAT is a matter for SACAT and the Board.
The reviews by Tribunal that are available do not include an avenue for a consumer to seek an external review of a complaint dismissal.	If a complainant is concerned that their complaint has not been appropriately handled by the Board, they may seek redress by going to the Ombudsman for investigation or where appropriate initiate civil proceedings against the veterinarian.
Explanatory guide advises that public may appeal a complaints dismissal with the ombudsman, but this is not outlined in the Bill.	The Ombudsman SA is established by the <i>Ombudsman Act 1972</i> to deal with complaints about South Australian state and local government. This Act is of general application and does not require the Bill to confer jurisdiction to it. More information about the Ombudsman SA, including how to make a complaint, is available at: www.ombudsman.sa.gov.au

Miscellaneous

Summary of feedback received

There were several submissions that provided feedback in relation to the exemptions provision in the Bill.

Feedback received during consultation demonstrated that there is widespread support for introducing the registration of veterinary nurses and technicians into South Australian legislation. This support was provided by all stakeholder categories.

Further feedback was received on exemptions related to artificial insemination. The proposal to provide an exemption (on a case-by-case basis) in the regulations for non-veterinarians to perform laparoscopic artificial insemination procedures received support from stakeholders.

Other feedback attributed to the “Miscellaneous” part of the Bill referred to provisions that enable certain contact details to be provided to the government, and that address victimisation, self-incrimination and legal professional privilege.

Feedback received	Response
Exemptions	
There should be no grounds for exemptions from the provisions of this legislation. Any and all animals should be provided an environment for optimal health care and welfare.	There is no intent for exemptions to reduce standards of veterinary care or to enable animal owners to avoid the costs of veterinary care.
Minister may hold too much power, which could make the Board and the public vulnerable to the political strategies of different governments.	Exemptions require appropriate oversight to ensure they are appropriately utilised to align with the purpose of the legislation and as such, Ministerial approval is considered appropriate (clause 89).
Exemptions should be used to assist in addressing the veterinarian shortage.	Noted.
Registration of veterinary nurses and technicians	
Request to incorporate registration of veterinary nurses and technicians into the Bill.	Consistent with the draft Bill, the final Bill does not provide for registration of veterinary nurses or technicians.
Support for the proposal to postpone registration of veterinary nurses and technicians until a harmonised national approach is established.	PIRSA acknowledges the important role that veterinary nurses, technicians and paraprofessionals play in the provision of veterinary services, along with the opportunity that such registration may provide.
Support for proposal to exempt qualified veterinary nurses and technicians to perform duties under the direction or supervision of a veterinarian, but further detail required on how the exemptions will function (i.e., what acts of veterinary service will be permitted, what level of veterinarian supervision is required).	The Australasian Veterinary Boards Council, the Veterinary Nurses Council of Australia and the Australian Veterinary Nurse and Technician Regulatory Council are currently working together to progress regulation and title protection for veterinary nurses and veterinary technicians .
Request for future consultation on the development of regulations to exempt veterinary nurses and technicians.	To support efficient, rationalised, national harmonisation, it is vital that any national work be afforded due consideration prior to South Australia making a decision to require registration of veterinary nurses and technicians. PIRSA will continue to monitor progress toward a national framework for the registration of veterinary nurses and technicians and consider this matter once the relevant work has been completed. PIRSA also

	<p>acknowledges that should a future decision be made to incorporate registration of veterinary nurses and technicians within the scope of the Veterinary Services Bill, amendments to the legislation would be required.</p> <p>In the meantime, it is important that veterinary nurses and technicians are enabled to undertake their employment without being in contravention of the Bill. This will be considered further through development of the regulations.</p>
Artificial insemination	
Recommendation to allow appropriately trained non-veterinarians to also be permitted to perform Laparoscopic AI via an exclusion in the Regulations.	Laparoscopic AI is considered both surgical and invasive under the definition of veterinary services. However, the Bill enables exemptions to be granted for a person other than a veterinarian to perform a veterinary service (clause 89). Such exemptions are intended to be considered on a case-by-case basis.
Support for enabling individuals to perform non-surgical artificial insemination under veterinary supervision, as enabled by the exemptions.	It is intended that the regulation of non-surgical AI remain unchanged from arrangements under the existing <i>Veterinary Practice Act 2003</i> and be enabled via regulations without the requirement to be performed 'under veterinary supervision'.
Surgical artificial insemination should only be carried out by a veterinarian.	The Bill provides that surgical artificial insemination only be carried out by a veterinarian (clause 3(1) 'veterinary service' and clause 49). However, the Bill enables exemptions to be granted for a person other than a veterinarian to perform a veterinary service (clause 89). Such exemptions are intended to be considered on a case-by-case basis.
Contact details to be provided to CE	
Supported the requirement for registered veterinarian's contact details to be provided to the Chief Executive as this will facilitate more effective communication, particularly during emergencies where direct and timely communication is required.	Noted.
Victimisation	
Provision is overly complex – this is likely to be a disincentive for victims to act. Suggestion that the clause should be under 'offences' in the Bill.	<p>The Victimisation clause (clause 95) is a standard provision. It is intended to protect people who have lodged complaints or potential whistle-blowers.</p> <p>The clause does not fall under offences because the offences section of the Bill refers to offences that relate to veterinary practice. Retaining the provision under Miscellaneous is consistent with similar legislation.</p>
How would disclosing information or having intent to disclose information affect confidentiality?	This provision is intended to protect potential whistle-blowers. The provision does not enable the disclosure of confidential information. Confidentiality is addressed under clause 94 .
Self-incrimination and legal professional privilege	
Considering that veterinarians are not legal practitioners, they should be able to refuse to answer certain questions if they have not sought legal advice.	Legal advice can be sought, but this would not prevent a person from having to produce a document if requested.

General Comments

The following table captures feedback that does not specifically relate to a provision of the Veterinary Services Bill 2023 or that is more general in nature. PIRSA has provided a response where appropriate.

Feedback received	Response
Removed sections of the <i>Veterinary Practice Act 2003</i>	
Sections 6(1)(a) and 6(1)(c) Support for the removal of the AVA and University of Adelaide nominees.	Noted.
Section 6(1)(a) Support for the removal of a Board member nominated by the University of Adelaide.	Noted.
Section 6(1)(a) Opposed removal of AVA nominee to the Board.	Noted. The skills, knowledge and experience of the AVA nominee would continue to be met through the veterinarian board members, who may or may not be AVA members.
Section 6(1)(c) Opposed removal of requirement for University of Adelaide to nominate a member of the Board with background in teaching veterinary science.	The skills, knowledge and experience of the Council of the University of Adelaide nominee could still be met through a veterinarian with skills, knowledge and experience in teaching of veterinary science (clause 6(2)(b)).
Section 45 Opposed removal of requirement for veterinarian to inform the Board of a claim of compensation against them for negligence amid concern this would lead to a lack of check and balance.	Noted. The Bill retains the avenue for members of the public to make a complaint to the Board under Part 7. Further to this, the Code of Professional Conduct or other standard could require a veterinarian to advise the Board of instances where legal proceedings have been initiated in association with claimed damages for alleged negligence. This would still provide a check and balance without the need for an offence, noting that the content of codes and standards is a matter for the Board.
Removal without notice	
The Board should provide notice before removing a person or a premises from the respective register.	The Bill does not prevent the Board from giving prior notice before removing a person or premises from a register. It enables removal without prior notice in situations where immediate removal is warranted.
Business impact	
The new Veterinary Services Bill will not have an unreasonable impact on the state's small business working in the industry.	Noted.
Education of veterinarians	
Suggestion that veterinary training should include dental training.	Veterinary training is not within the scope of this Bill. It is a matter for Universities or the AVBC through its core function relating to veterinary education and accreditation of programs.
Profiteering / prescription medications	
Recommendation that profiteering on prescription medications be prohibited.	This Bill is not intended to regulate the fees charged by the profession.
Livestock producer access to veterinary services	
Request that the Bill does not impact the close working relationship between livestock producers and their chosen veterinary clinic.	The Bill does not change the current arrangements that relate to access to veterinary services by primary producers or the ability for primary producers to treat their own animals, provided they do not breach other legislation such as the <i>Controlled Substances Act 1984</i> or the <i>Animal Welfare Act 1985</i> .
Veterinary services in remote areas	
Request that the Bill allow for the provision of emergency animal welfare treatments by non-	The Bill does not prevent the provision of emergency care by unqualified persons (non-veterinarians) provided it is not performed for money or other

<p>veterinarians where access to veterinary services is not feasible in remote areas.</p>	<p>consideration, and the treatment does not breach other relevant legislation such as <i>the Controlled Substances Act 1984</i> or the <i>Animal Welfare Act 1985</i>.</p> <p>The Bill also provides flexibility for exemptions (clause 89) or relevant offence provisions such as clause 49 to be disapplied in certain circumstances.</p> <p>This may be explored further during development of regulations, noting that current regulations under the <i>Veterinary Practice Act 2003</i> provide an exemption for the provision of veterinary treatment by unqualified persons in circumstances where the treatment is performed by a registered health professional in accordance with the directions of a veterinary surgeon, and provide for the administration of an anaesthetic, drug or vaccine to an animal by a person in accordance with the directions of a veterinary surgeon.</p>
<p>Consideration of Aboriginal and Indigenous culture</p>	
<p>Aboriginal and Indigenous cultural views on animal 'ownership' have an implication for vet-client-patient relationships in the delivery of veterinary services.</p>	<p>Noted. In relevant instances where the Bill refers to the 'owner' of a relevant animal, the Bill also refers to a 'person in control of' the relevant animal (Clause 50, 53).</p> <p>Further to this and where required, culturally influenced views regarding ownership could be accommodated in codes or guidelines developed by the Board which refer to ownership or bona fide relationships. This is a matter for the Board.</p>
<p>Red tape reduction / administrative burden</p>	
<p>Request that the Bill does not introduce 'red tape' and administrative burden on the profession.</p>	<p>The Bill does not intend to introduce administrative burden. It reduces administrative burden in some areas including the removal of unnecessary approvals and reporting requirements and the handling of complaints (Part 7). Registration of premises is a new requirement under the Bill (Part 4), which has been partially offset by removal of existing requirements relating to Veterinary Services Providers.</p>
<p>AHPRA</p>	
<p>Query as to whether AHPRA has any jurisdiction in providing oversight or guidance to the Board or to SACAT.</p>	<p>AHPRA is the regulatory authority for human health practitioners, governed by national legislation. AHPRA has no role in relation to veterinarians. Further information regarding AHPRA is available online at ahpra.gov.au.</p>
<p>Pet euthanasia / low cost payment scheme</p>	
<p>Request for the government to create a low-cost payment scheme for low-income earners to not have to euthanise their pets due to poor financial circumstances.</p>	<p>Veterinary fees and payment schemes are outside of the scope of the Bill.</p>
<p>Freedom of information</p>	
<p>Request for the identity of the Board's freedom of information officer. Suggestion that the FOI officer should not be the Executive Officer but a separate person.</p>	<p>Freedom of Information responsibilities are outside the scope of the Bill and governed by the <i>Freedom of Information Act 1991</i>.</p>
<p>Veterinary shortage</p>	
<p>Consider a critical assessment into how the new legislation can be safely broadened to address the urgent need for more rural veterinarians, including through expanding the ability of appropriately skilled non-veterinarians to provide certain veterinary services.</p>	<p>Noted. The Bill provides for certain clauses to be expanded or limited by regulation, which may provide flexibility to assist in addressing a shortage of veterinarians. In particular:</p> <ul style="list-style-type: none"> acts or activities may be excluded from the definition of veterinary service by the regulations,

	<p>effectively enabling their provision by non-veterinarians (clause 3(1) “veterinary service”)</p> <ul style="list-style-type: none"> • further circumstances may be prescribed by regulation to enable non-veterinarians to provide veterinary services or veterinary services of a class (clause 49(2)) <p>Where these provisions may not provide the scope required, the Bill also provides for the Minister to exempt a specified person, or class of persons, from the operation of a provision or provisions (clause 89(1)).</p>
Allied therapists	
<p>Suggestion that allied therapists should be able to perform their treatments without veterinary permission or referral.</p>	<p>The Bill regulates veterinarians and veterinary services. The Bill does not register or regulate allied therapists. The regulations may enable certain acts able to be undertaken by allied therapists by excluding them from the definition of veterinary service (clause 3(1) “veterinary service”).</p>

Appendix A - Bill mapping guide

Veterinary Services Bill 2023	Draft Veterinary Services Bill 2022	Veterinary Practice Act 2003
Part 1—Preliminary	Part 1—Preliminary	Part 1—Preliminary
1 Short title	1 Short title	1 Short title
2 Commencement	2 Commencement	N/A
3 Interpretation	3 Interpretation	3 Interpretation
4 Application of Act	4 Application of Act	N/A
Part 2—Veterinary Services Regulatory Board of South Australia	Part 2—Veterinary Services Regulatory Board of South Australia	Part 2—Veterinary Surgeons Board of South Australia
Division 1—Veterinary Services Regulatory Board of South Australia	Division 1—Establishment of Board	Division 1—Continuation of Board
5 Continuation of Board	5 Establishment of Board 16 Directions by Minister	5 Continuation of Board
6 Composition of Board	6 Composition of Board	6 Composition of Board
7 Terms and conditions of membership	7 Terms and conditions of membership	7 Terms and conditions of membership
8 Direction if Board fails to carry out functions	8 Direction if Board fails to carry out functions	N/A
9 Removal of all members of Board	9 Removal of all members of Board	N/A
10 Vacancies or defects in appointment of members	11 Vacancies or defects in appointment of members	8 Vacancies or defects in appointment of members
11 Remuneration	12 Remuneration	9 Remuneration
12 Governance training	10 Governance training	N/A
13 Publication of appointments	13 Publication of appointments	N/A
14 Functions	14 Objects 15 Functions	12 Objects 13 Functions
15 Reporting on exercise of functions	27 Reporting on exercise of functions	N/A
16 Committees	17 Committees	15 Committees
17 Delegations	18 Delegations	16 Delegations
18 Procedures	19 Procedures	17 Procedures
19 Staff and resources	32 Staff	11 Staff
20 Application of Public Sector (Honesty and Accountability) Act	20 Application of Public Sector (Honesty and Accountability) Act	18 Application of Public Sector (Honesty and Accountability) Act
21 Power to require medical examination or report	22 Power to require medical examination or report	20 Power to require medical examination or report
22 Accounts and audit	26 Accounts and audit	24 Accounts and audit
23 Annual report	28 Annual report	25 Annual report
Division 2—Executive Officer	Division 6—Executive Officer and staff (under Part 2)	Division 3—Registrar and staff (under Part 2)
24 Executive Officer	29 Executive Officer	10 Registrar
25 Functions	30 Functions	N/A
26 Delegations	31 Delegations	N/A
Part 3—Registration of veterinarians	Part 3—Registers Part 4—Registration of veterinarians	Part 3—Registration of veterinary surgeons
Division 1—Registers	Division 1—Registers (under Part 4)	Division 1—Registers (under Part 3)
27 Registers	33 Registers 34 Provisions of general application to registers 35 General and specialist registers 36 Register of persons removed from general or specialist register 37 Register of decisions relating to deemed registration	26 Registers 30 Provisions of general application to registers 28 General and specialist registers 29 Register of persons removed from general or specialist register 29A Register of decisions relating to deemed registration

Veterinary Services Bill 2023	Draft Veterinary Services Bill 2022	Veterinary Practice Act 2003
Division 2—Primary registration	Division 2—Primary registration (under Part 4)	Division 2—Primary registration (under Part 3)
28 Registration on general or specialist register	35 General and specialist registers 39 Registration of natural persons on general or specialist register 40 Application for registration 44 Conditions of registration 45 Contravention of conditions of registration 52 Authority conferred by primary or deemed registration	28 General and specialist registers 32 Registration of natural persons on general or specialist register 33 Application for registration 37 Variation or revocation of conditions of registration 38 Contravention of conditions of registration 38F Authority conferred by primary or deemed registration
29 Veterinarian to inform Board of changes to certain information	38 Requirement to inform Board of changes	31 Requirement to inform Board of changes
30 Removal from register	41 Removal from register or specialty	34 Removal from register or specialty
31 Reinstatement on register	42 Reinstatement on register or in specialty	35 Reinstatement on register or in specialty
32 Fees and returns	43 Fees and returns	36 Fees and returns
Division 3—Deemed registration	Division 3—Deemed registration (under Part 4)	Division 3—Deemed registration (under Part 3)
33 Recognition of veterinarians registered in other jurisdictions	46 Recognition of veterinarians registered in other jurisdictions	38A Recognition of veterinarians registered in other jurisdictions
34 Contravention of conditions of deemed registration	47 Contravention of conditions of deemed registration	38C Contravention of conditions of deemed registration
35 Veterinarians with deemed registration to inform Board of contact details etc	48 Requirement to inform Board of contact details	N/A
Division 4—Registration in participating jurisdictions	Division 4—Relationship between registration in participating jurisdictions (under Part 4)	Division 4—Relationship between registration in participating jurisdictions (under Part 2)
36 Registration to be subject to conditions	49 Conditions of registration	38D Conditions of registration
37 Suspension or cancellation of registration or disqualification	50 Suspension or cancellation of registration or disqualification	38E Suspension or cancellation of registration or disqualification
Division 5—Suspension or variation of registration in urgent circumstances	Division 5—Suspension or variation of registration in urgent circumstances (under Part 4)	N/A
38 Suspension or variation of registration where veterinarian charged with certain offences or unacceptable risk to animals	51 Suspension of registration or imposition of conditions in urgent circumstances	N/A
Part 4—Registration of premises at which veterinary services provided	Part 5—Registration of premises	N/A
39 Registers	33 Registers 34 Provisions of general application to registers 53 Veterinary premises register	N/A
40 Veterinary premises standard	54 Requirements for registered premises	N/A
41 Responsible person in respect of registered premises	N/A	N/A
42 Registration by Board of premises as registered premises	55 Registration by Board of premises as registered premises 56 Application for registration 61 Conditions of registration	N/A
43 Suspension or cancellation of registration	57 Suspension or cancellation of registration	N/A
44 Removal from register	58 Removal from register	N/A
45 Reinstatement on register	59 Reinstatement on register	N/A

Veterinary Services Bill 2023	Draft Veterinary Services Bill 2022	Veterinary Practice Act 2003
46 Fees	60 Fees	N/A
47 Contravention of conditions of registration	62 Contravention of conditions of registration	N/A
48 Requirement to inform Board of changes	63 Requirement to inform Board of changes	N/A
Part 5—Veterinary practice	Part 6—Offences relating to veterinary practice	Part 4—Veterinary practice
Division 1—Veterinary practice	N/A	Division 1—General offences
49 Veterinary services to be provided by veterinarians	64 Prohibition on provision of veterinary services for fee or reward by persons who are not veterinarians	39 Prohibition on provision of veterinary services for fee or reward by unqualified persons
50 Veterinary services must be provided at registered premises	71 Veterinary services must be provided at registered premises	N/A
51 Offence to carry on certain businesses other than at registered premises	N/A	N/A
52 Veterinarian to hold certain insurance	69 Veterinarian to be indemnified against loss	44 Veterinary surgeon to be indemnified against loss
Division 2—Improperly influencing veterinarians etc	N/A	N/A
53 Application of Division	72 Undue influence	51 Improper directions etc to veterinary surgeon by veterinary services provider
54 Undue influence	72 Undue influence	51 Improper directions etc to veterinary surgeon by veterinary services provider
55 Improper directions etc to veterinarian	72 Undue influence	51 Improper directions etc to veterinary surgeon by veterinary services provider
Division 3—Other offences relating to veterinary practices etc	Part 6—Offences relating to veterinary practice	Part 4, Division 1—General offences
56 Offence to give, offer or accept benefit for recommendation or prescription	70 Offence to give, offer or accept benefit for recommendation or prescription	49 Offence to give, offer or accept benefit for recommendation or prescription
57 Illegal holding out as veterinarian or specialist	65 Illegal holding out as veterinarian or specialist	40 Illegal holding out as veterinarian or specialist
58 Illegal holding out concerning limitations or conditions	66 Illegal holding out concerning limitations or conditions	41 Illegal holding out concerning limitations or conditions
59 Illegal holding out concerning registered premises	67 Illegal holding out concerning registered premises	N/A
60 Use of certain titles or descriptions prohibited	68 Use of certain titles or descriptions prohibited	42 Use of certain titles or descriptions prohibited
Part 6—Medical fitness to provide veterinary services	Part 7, Division 4—Medical fitness	Part 5, Division 3—Medical fitness
61 Medical fitness to provide veterinary services	85 Medical fitness to provide veterinary services	4 Medical fitness to provide veterinary treatment
62 Obligation to report medical unfitness of veterinarian	86 Obligation to report medical unfitness of veterinarian	59 Obligation to report medical unfitness of veterinary surgeon
63 Medical fitness of veterinarian	87 Medical fitness of veterinarian	60 Medical fitness of veterinary surgeon
64 Proceedings before Board under Part	21 Powers in relation to witnesses etc 23 Principles governing proceedings 24 Representation at proceedings	19 Powers in relation to witnesses etc 21 Principles governing proceedings 22 Representation at proceedings
Part 7—Complaints, investigations and proceedings	Part 7—Complaints, investigations and proceedings	Part 5—Investigations and proceedings
Division 1—Preliminary	Part 7, Division 1—Preliminary	Part 5, Division 1—Preliminary
65 Interpretation	73 Interpretation	55 Interpretation
66 Proper cause for disciplinary action	88 Cause for disciplinary action	61 Cause for disciplinary action

Veterinary Services Bill 2023	Draft Veterinary Services Bill 2022	Veterinary Practice Act 2003
Division 2—Complaints	Part 7, Division 2—Complaints	N/A
67 Board to establish processes for complaints	74 Making of complaints 75 Processes for dealing with complaints 78 Notification of dismissal	N/A
68 Making complaint against veterinarian etc	74 Making of complaints	N/A
69 Assessment of complaints	76 Preliminary examination of complaints	N/A
70 Dismissal of certain complaints	77 Dismissal of complaint	N/A
71 Decision to take no further action	N/A	N/A
Division 3—Certain complaints may be resolved by Board	N/A	N/A
72 Application etc of Division	N/A	N/A
73 Complaints that may be dealt with under Division	N/A	N/A
74 Dealing with matters by way of Board resolution	N/A	N/A
75 Duty of Executive Officer with respect to conflict of interest	N/A	N/A
76 Monitoring of Board resolutions	N/A	N/A
Division 4—Investigations	Part 7, Division 3—Investigations	Part 5, Division 2—Investigations
77 Investigation of complaints	79 Action after preliminary examination	N/A
Division 5—Disciplinary action before Tribunal	Part 7, Division 5—Disciplinary action	Part 5, Division 4—Disciplinary action
78 Hearing by Tribunal as to matters constituting grounds for disciplinary action	89 Hearing by Tribunal as to matters constituting grounds for disciplinary action	62 Hearing by Tribunal as to matters constituting grounds for disciplinary action
79 Constitution of Tribunal	91 Constitution of Tribunal	63 Constitution of Tribunal
80 Punishment of conduct that constitutes offence	102 Punishment of conduct that constitutes offence	72 Punishment of conduct that constitutes offence
81 No internal review by Tribunal of decision under Division etc	94 No internal review by Tribunal of decision under Part	N/A
Part 8—Inspectors	N/A	N/A
82 Guidelines	80 Guidelines	N/A
83 Inspectors	81 Inspectors	N/A
84 Functions of inspectors	N/A	N/A
85 Powers of inspectors	82 Powers of inspectors	56 Powers of inspectors
86 Offence to hinder etc inspector	83 Offence to hinder etc inspector	57 Offence to hinder etc inspector
Part 9—Review of certain decisions by Tribunal	Part 8—Reviews	Part 6—Reviews
87 Review of certain decisions by Tribunal	92 Review by Tribunal	66 Review by Tribunal
88 Variation or revocation of conditions imposed by Tribunal	93 Variation or revocation of conditions imposed by Tribunal	67 Variation or revocation of conditions imposed by Tribunal
Part 10—Miscellaneous	Part 9—Miscellaneous	Part 7—Miscellaneous
89 Exemptions	95 Exemptions	N/A
90 Contact details to be provided to Chief Executive	97 Contact details to be provided to Chief Executive	N/A
91 False or misleading statement	98 False or misleading statement	68 False or misleading statement
92 Procurement of registration by fraud	99 Procurement of registration by fraud	69 Procurement of registration by fraud
93 Self-incrimination and legal professional privilege	101 Self-incrimination and legal professional privilege	71 Self-incrimination and legal professional privilege
94 Confidentiality	103 Confidentiality	74 Confidentiality
95 Victimisation	100 Victimisation	70 Victimisation
96 Arrangements between the Board and interstate registration authorities	104 Arrangements between the Board and interstate registration authorities	75 Arrangements between the Board and interstate registration authorities

Veterinary Services Bill 2023	Draft Veterinary Services Bill 2022	Veterinary Practice Act 2003
97 Notification of disciplinary action to interstate registration authorities	105 Notification of disciplinary action to interstate registration authorities	75A Notification of disciplinary action to interstate registration authorities
98 Evidentiary provision	106 Evidentiary provision	76 Evidentiary provision
99 Regulations and fee notices	108 Regulations and fee notices	79 Regulations
Clauses not in final Bill		
N/A	25 Costs	23 Costs
N/A	N/A	43 Board's approval required where veterinary surgeon has not practised for 3 years
N/A	N/A	45 Information relating to claim against veterinary surgeon to be provided
N/A	N/A	46 Interpretation
N/A	N/A	47 Veterinary surgeon or prescribed relative to inform Board of interests in prescribed business
N/A	N/A	48 Veterinary surgeon to inform client of interests in prescribed businesses
N/A	N/A	50 Information to be given to Board by veterinary services provider
N/A	N/A	52 Illegal holding out of facility as veterinary hospital
N/A	N/A	53 Accreditation by Board of facility as veterinary hospital
N/A	N/A	54 Requirement to inform Board on becoming owner or occupier of facility accredited as veterinary hospital
N/A	84 Offences by inspectors	58 Offences by inspectors
N/A	90 Publication of prohibition orders	62(10)
N/A	N/A	77 Service
N/A	107 Variation or revocation of notices	78 Variation or revocation of notices

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry, no matter how small, should be recorded to ensure the integrity of the financial data. This includes not only sales and purchases but also expenses, income, and any other financial activities. The text explains that proper record-keeping is essential for identifying trends, managing cash flow, and preparing for tax obligations. It also highlights the role of technology in streamlining the recording process, such as using accounting software to automate data entry and generate reports. The second part of the document focuses on the analysis of the recorded data. It describes various methods for interpreting the information, such as comparing current performance with historical data or industry benchmarks. The text also discusses the importance of regular reviews and audits to detect any discrepancies or errors. Finally, the document concludes by stressing the need for transparency and accountability in financial reporting, and how accurate records can provide a clear picture of the organization's financial health and performance.