



Options for Registration of Veterinary Nurses

Contents

- Executive Summary.....1
- Need for Government Action2
- Objective of Government Action3
- Consideration of Options.....3
- Consultation with Stakeholders.....7
- Preferred Option.....9
- Evaluation and Review10
- Additional References10
- Appendix 1: Current Definitions11
- Appendix 2: Survey and results of stakeholder consultation 12

Executive Summary

The Sustainable Practice Committee (SPC) of the AVBC has investigated options for the registration of veterinary nurses in Australia and New Zealand. Currently, Western Australia is the only jurisdiction which approves persons to perform specific duties prescribed for veterinary nurses (*Veterinary Surgeons Regulations 1979* (reg 65)) and Queensland is the only jurisdiction which defines the term veterinary nurse in legislation (*Medicines and Poisons Regulation 2021* (sch 11)).

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

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

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

The SPC noted the lack of regulation of veterinary nurses in most jurisdictions in Australia is a significant risk for animal welfare, workforce capacity and the international reputation of Australia as a leading provider of veterinary services. However, the SPC formed the view that a solution to this problem which involved significant legislative change across all jurisdictions would be difficult to achieve.

It may be possible to realise the benefits and begin the process of regulating veterinary nurses through the addition of a consistent definition of a veterinary nurse within veterinary legislation across Australasia. This definition could be linked to registration with an independent national body representing veterinary nurses and veterinarians which may also assume responsibility for determining the educational and professional standards for veterinary nurses.

The SPC considered that such an approach would align with right-touch principles and would minimise the regulatory burden for the profession and the public, minimise the administrative load for individual veterinary regulators in Australia and provide the potential for a consistent regulatory framework across all jurisdictions.

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

Need for Government Action

Veterinary nurses comprise approximately 42% of the veterinary services workforce in Australia,² and yet Queensland is the only jurisdiction which provides a definition of a veterinary nurse (*Medicines and Poisons Regulation 2021* (sch 11)³, and, with the exception of Western Australia, the legislation generally allows any person to assist a veterinarian and perform a wide range of tasks that could adversely affect animal welfare.

Whilst the number of veterinarians has been shown to grow at a rate greater than the population and household growth,⁴ there is a significant shortage of veterinarians in Australasian jurisdictions and these shortages may contribute to stress and burnout in the profession⁵ and poor animal welfare outcomes. In addition, the recent pandemic and natural disasters have highlighted an over-reliance on overseas trained veterinarians to meet the needs of the veterinary profession and a vulnerability in being able to adequately respond to both human and animal emergencies.

There is an increasing population of degree qualified veterinary technicians and highly trained veterinary nurses who have limited opportunities but are capable of making a more substantial contribution to the provision of veterinary services in Australasia.⁶ Accordingly, a regulated veterinary nursing profession could improve the capacity and efficiency of the many small businesses delivering these services to urban, regional and remote communities, thereby reducing the pressures on veterinarians and improving animal welfare outcomes.

Further, there is increasing community concern in relation to the growing cost of veterinary services and its potential impact on animal welfare⁷ and improvements in the capacity and efficiency of veterinary businesses have the potential to decrease the cost of these services to consumers.

Finally, the World Organisation for Animal Health (WOAH), founded as OIE, recognises the importance of regulating and applying disciplinary measures to both veterinarians and veterinary paraprofessionals and its recent evaluation of the Performance of Veterinary Services in Australia noted the failure of all states and territories of Australia (with the exception of Western Australia⁸) to regulate veterinary paraprofessionals thereby leading to a lower level of advancement than comparable countries such as the UK and USA.

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

- Expose Australasia to greater risks from human and animal emergencies
- Leave these highly trained professionals with limited career options leading to significant wastage and inhibit further developments in veterinary nursing care
- Inhibit improvement in the efficiency of delivery of veterinary services to the public
- Maintain an over-reliance on overseas trained veterinarians in an increasingly competitive global market

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

3 Medicines and Poisons (Medicines) Regulation 2021 (sch 11) defines a veterinary nurse as a person who is employed to practise veterinary nursing and holds a qualification that makes that person eligible for full membership of the Veterinary Nurses Council of Australia Inc. Available: <https://www.legislation.qld.gov.au/view/pdf/asmade/sl-2021-0140>. Accessed 23 August 2022.

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

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

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

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

8 Some regulation of paraprofessionals is possible in NSW

- Expose the individual regulators to internal and external pressures through applications from minimally qualified individuals seeking to address market opportunities created by the shortage of veterinarians and thereby risking long and short-term animal welfare outcomes
- Adversely impact the reputation of Australia and New Zealand as leaders in the provision of veterinary services and animal welfare through limiting the Performance of Veterinary Services evaluations by the WOAAH.

Objective of Government Action

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

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

Consideration of Options

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

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

Status Quo: Voluntary, Non-Statutory Licensing Scheme

The Australian Veterinary Nurse and Technician (AVNAT) registration scheme was launched by the Veterinary Nurses Council of Australia (VNCA) in April 2019.⁹ It is a voluntary scheme with a stated purpose aligned with meeting the needs for government action:

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

⁹ Veterinary Nurses Council of Australia, AVNAT Registration Scheme, Available: <https://www.vnca.asn.au/avnat/>. Accessed 23 February 2022.

There are currently 800 registered veterinary nurses under this scheme from an estimated population of 12,600¹⁰ persons employed as veterinary nurses.

The scheme has the following advantages:

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

The scheme has the following disadvantages:

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

Statutory Regulation through Protection of Title

Statutory regulation is vital to the development of a profession and provides the opportunity for protection of title. As noted above, with the exception of Queensland, there is no statutory definition of a veterinary nurse despite a number of qualifications, varying from AQF level 4 to AQF level 7, leading to possible employment as a veterinary nurse. It is also possible to be employed as a veterinary nurse with no formal qualifications or experience in this area given the lack of statutory definition.

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

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

1. Regulation by the AVNAT registration scheme

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

This option has the following advantages:

- The title veterinary nurse is protected by legislation leading to a statutory requirement for registration

¹⁰ Australian Industry and Skills Committee 2021, Veterinary Nursing, National Industry Insights Report. Available: <https://nationalindustryinsights.aisc.net.au/industries/animal-care-and-management/veterinary-nursing>. Accessed 23 February 2022.

- A national registration scheme would ensure mobility of veterinary nurses and establish a standard cost structure for registrants with potential for economies of scale noting that veterinary nurses typically earn between \$44,000 and \$87,000 per year, entry level nurses earning \$39,000 per year¹¹ and an overall average salary of \$48,700 per year¹²
- The costs associated with establishing this framework have largely already been borne by the VNCA when it established AVNAT
- A national database has the potential to provide data for workforce planning and research.

This option has the following disadvantages:

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

2. Regulation by the Australasian Veterinary Boards Council

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

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

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

This option has the following advantages:

- The title veterinary nurse is protected by legislation leading to a statutory requirement for registration
- A national registration scheme would ensure mobility of veterinary nurses and establish a standard cost structure for registrants with potential for economies of scale

¹¹ Cochrane A 2021, The truth about a career in veterinary nursing, TafeCourses.com.au. Available: <https://www.tafecourses.com.au/resources/the-truth-about-a-career-in-veterinary-nursing/>. Accessed 23 February 2022.

¹² Payscale 2022, Average veterinary nurse hourly pay in Australia. Available: https://www.payscale.com/research/AU/Job=Veterinary_Nurse/Hourly_Rate. Accessed 25 February 2022.

- The AVBC may be able to purchase AVNAT resources reducing costs associated with establishment of a national registration database or need for duplication
- The AVBC is currently investigation options for a national veterinarian database and if progressed this database may be relatively easily modified to include registered veterinary nurses
- Alignment with the core functions and existing expertise available to the AVBC
- Reduced costs are likely for veterinary businesses and registrants compared to a state-based approach to registration and regulation
- Alignment with a long-standing and successful model implemented in the US whereby the American Association of Veterinary State Boards provides a similar role
- A national database has the potential to provide data for workforce planning and research and this advantage may be amplified if a national database of registered veterinarians is also developed.

This option has the following disadvantages:

- The AVBC currently does not register veterinarians or investigate complaints against veterinarians and therefore does not possess the expertise and processes available to AVNAT
- The AVBC membership is focused on veterinary board representation
- The AVBC development of a database for veterinary nurses may simply lead to a duplication of costs previously incurred by AVNAT
- Registration and complaint investigation functions are not recognised as core functions of the AVBC and therefore a broader definition of these core functions within the AVBC may be required
- Regulation is being achieved through outsourcing by the statutory regulator in each jurisdiction which may not fulfil WOAHP requirements when assessing the performance of veterinary services.

3. Regulation by veterinary regulators within each jurisdiction

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

This option has the following advantages:

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

This option has the following disadvantages:

- State-based regulation creates a more complex system for mobility within the profession as evidence by the current state-based veterinary regulation model in Australia

- State-based regulation is likely to involve increased costs for businesses and registrants as evidenced by the current veterinary model which has registration renewal fees in Australia ranging from \$124 to \$731¹³
- Cost allocations for this register and regulation may be difficult to clearly separate from the veterinary register leading to possible subsidies provided to either veterinarians or veterinary nurses
- Veterinary regulators may not receive sufficient additional funding or resources required for implementation
- The ability to establish a national database, and its potential advantages, would be significantly hindered as it is currently for veterinarians in Australia.

Statutory Regulation through Adoption of Specific Legislation

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

This option has the following advantages:

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

This option has the following disadvantages:

- State-based regulation creates a more complex system for mobility within the profession as evidenced by the current state-based veterinary regulation model
- State-based regulation is likely to involve increased costs for businesses and registrants as evidence by the current veterinary model which has registration renewal fees in Australia ranging from \$124 to \$731¹⁴
- With similar functions and responsibilities to the veterinarian register it is possible registration costs will be similar for veterinary nurses who typically earn significantly less than veterinarians¹⁵
- The ability to establish a national database, and its potential advantages, would be significantly hindered as it is currently for veterinarians in Australia.
- Arguably not proportional to the problem outlined in that it involves establishment of a new licence system through new legislation to address objectives which arguably will be achieved through a lower-level intervention.

Consultation with Stakeholders

The major stakeholders are:

1. Persons employed as veterinary nurses, veterinary technicians and those who had completed qualifications in these areas
2. The Veterinary Nurses Council of Australia (VNCA)

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

¹⁴ Veterinary Practitioners Board NSW 2021, Report on fees and remuneration. Available: <https://www.vpb.nsw.gov.au/sites/default/files/images/2021%20Report%20on%20Fees%20and%20Remuneration.pdf>. Accessed 25 February 2022.

¹⁵ Payscale 2022, Average veterinarian salary in Australia. Available: <https://www.payscale.com/research/AU/Job=Veterinarian/Salary>. Accessed 25 February 2022.

3. Registered veterinarians
4. The Australian Veterinary Association (AVA)
5. Veterinary registration and licensing authorities in Australia and New Zealand
6. The Australasian Veterinary Boards Council (AVBC)
7. Veterinary Schools of Australia and New Zealand (VSANZ)
8. Veterinary Nursing Registered Training Organisations (RTOs)
9. National Industry Advisory Group for Veterinary Nursing

A questionnaire was designed to address the following research questions:

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

The results of a stakeholder consultation survey are provided in Appendix 2.

In summary, there were 2,358 responses to the survey from veterinarians, veterinary nurses, veterinary technicians, veterinary practice owners and managers, academics, regulators and students and all states and territories of Australia were represented. Experience within the veterinary industry ranged from 0 to over 30 years.

Overall, 88% of respondents supported the registration of veterinary nurses with the majority of respondents agreeing that this would lead to improvements in animal welfare and in the efficiency of delivery of veterinary services. There was generally less support for the possibility that veterinary nurse registration would decrease the cost of veterinary services despite perceived increases in efficiency in the delivery of these services.

The main potential disadvantage of registration of veterinary nurses was considered to be increased costs to veterinary practice owners as seen by veterinary practice owners and to a lesser extent veterinarians.

The preferred method for regulation was an independent national body representing veterinarians and veterinary nurses followed by an independent national registration body representing veterinary nurses. State based regulation by the local veterinary registration authority was the least preferred option (including for respondents based in Western Australia where this currently exists).

Veterinarians, veterinary nurses, practice managers, and practice owners generally favoured a Certificate IV as the minimum qualification to define a veterinary nurse whilst veterinary technicians, respondents from teaching and research, and others, were more supportive of diplomas and bachelor degrees. Respondents who favoured a certificate III as the minimum qualification were generally less supportive of registration. There was general support across respondent types and locations for an initial period whereby applicants with suitable experience and without a defined minimum qualification could be registered.

Preferred Option

Based on the available literature and stakeholder consultation it is the opinion of the Sustainable Practice Committee that:

1. State based veterinary legislation define a veterinary nurse as a person with suitable qualifications who is registered with an independent national body representing veterinary nurses and veterinarians
2. Veterinary technicians should also be recognised although the term veterinary nurse is preferred for those working in veterinary clinical practice
3. The minimum suitable qualification for registration is a certificate IV however there should be an initial period where applications could be considered from persons currently performing the duties of a veterinary nurse and with a defined minimum level of experience in this role
4. The register should consist of divisions in a similar approach to the AHPRA model and the model adopted should provide encouragement to pursue higher AQF level qualifications (see Table 1).

Prior to recommending registration by an independent national body representing veterinary nurses and veterinarians it would be important to determine whether such a system would meet WOAHP requirements for the regulation of paraprofessionals and therefore lead to advancement in its assessment of professional veterinary services.

Table 1: Recommended definitions and registration divisions for veterinary nurses

Registered Veterinary Nurse or Technician (Division 1)	A person with a degree (minimum AQF 7) in veterinary technology or equivalent major and who is registered by a recognised governing body
Registered Veterinary Nurse (Division 2)	A person with a VET qualification (minimum AQF 5) and who is registered by a recognised governing body
Registered Veterinary Nurse (Division 3)	A person with a VET qualification (minimum AQF 4) and who is registered by a recognised governing body
Enrolled Veterinary Nurse (Division 4)	A person with such qualifications and experience in the field of veterinary nursing to justify registration by a recognised governing body

The establishment of the above divisions depicted in Table 1 would facilitate future discussions within the industry regarding the various duties which can be performed by these persons and the level of supervision, if any, required when performing such duties. Moreover, it is vital that this system is used as a foundation for redeveloping the Animal Care and Veterinary Services Award 2020 to ensure veterinary technicians and nurses are paid at a level which is commensurate with their qualifications and experience.

It would be important to consult with persons currently employed as veterinary nurses and veterinary technicians regarding the above registration divisions. Whilst such a system may promote development of the nursing profession, align with comments provided by veterinary technicians, and potentially facilitate a differentiation of duties and permitted procedures, it may also be seen as devaluing the role of the majority of current veterinary nurses.

Evaluation and Review

It is unlikely that uniform changes to legislation would be achieved in a short period and therefore those jurisdictions agreeing to implement the preferred option should collect data to evaluate the impact of legislative change with particular reference to the potential advantages and disadvantages considered in stakeholder consultation and monitoring for unintended consequences.

In addition to quantification of advantages and disadvantages outlined in this paper changes to salaries and the demand for veterinary nurses and technicians with AQF 7 qualifications should be considered.

Additional References

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

Appendix 1: Current Definitions

Animal attendant	A person who may have completed a VET qualification in animal studies, animal technology, captive animals, companion animal services, or related area but who may not have formal qualifications. ¹⁶
Animal technician	A person who usually has completed a VET qualification in animal technology, captive animals or laboratory technology specialising in biological testing, environmental monitoring or biotechnology. ¹⁶
Approved person	A person approved by the Veterinary Practitioners Board to perform one or more restricted acts of veterinary science.
Supervision	<p>Three levels of supervision:¹⁷</p> <p>Immediate supervision is when the veterinarian is immediately available to provide personal assistance (physically adjacent) when required</p> <p>Direct supervision is when the veterinarian is readily available to provide personal assistance (physically close-by) when required</p> <p>Indirect supervision is when the veterinarian is contactable and available to provide assistance when required</p>
Veterinarian	A person who has completed an accredited veterinary science degree at university or a relevant degree such as science, animal science or veterinary bioscience, followed by a Doctor of Veterinary Medicine ¹⁶ and is registered with a veterinary board in Australia.
Veterinary nurse	A person who has generally completed a VET qualification (Certificate IV) or who has completed a traineeship. ¹⁸
Veterinary nurse assistant	A person who has generally completed a VET qualification (Certificate II or III in Animal Studies). ¹⁸
Veterinary technician	A person with a degree in Veterinary Technology. ¹⁸

¹⁶ Good Universities Guide. Available: <https://www.gooduniversitiesguide.com.au/careers-guide/>

¹⁷ Veterinary Practitioners Board NSW, Supervision of non-veterinarians 2021. Available: <https://www.vpb.nsw.gov.au/sites/default/files/images/PR08%20Supervision%20of%20Non-Veterinarians%2020211125.pdf>

¹⁸ Applied Vocational Training. Available: <https://www.appvoc.com/>

Appendix 2: Survey and results of stakeholder consultation

Background

A questionnaire was developed to answer the following research questions:

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

The draft questionnaire was distributed to members of the Australasian Veterinary Boards Council Inc. (AVBC), veterinary boards, Veterinary Nurses Council of Australia (VNCA) and the National Industry Advisory Group for veterinary nursing. There were 62 responses, and an analysis of these results was presented to the AVBC for discussion at its meeting in May 2022.

Based on analysis and feedback provided, the questionnaire was finalised and administered more broadly to veterinarians, veterinary nurses, veterinary technicians, veterinary practice owners and managers, academics and students. The AVBC, veterinary boards, Australian Veterinary Association and VNCA assisted in distributing the questionnaire which was available online from 10 June 2022 to 20 July 2022.

Results

There were 2,358 responses to the survey with 40% of respondents identifying as a veterinary nurse and 29% identifying as a veterinarian (see Figure 1). All states and territories of Australia were represented and there were 23 responses from New Zealand (Figure 2). The average respondent had been a part of the veterinary industry for 14 years (Figure 3).

Figure 1: Respondents by role within the veterinary industry

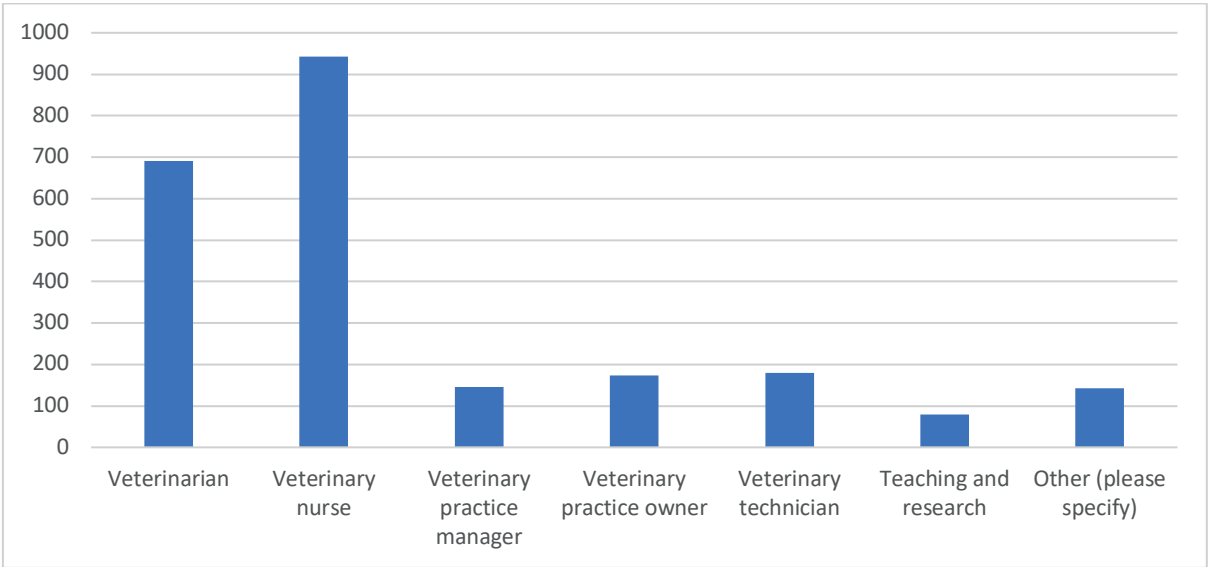


Figure 2: Respondents by location

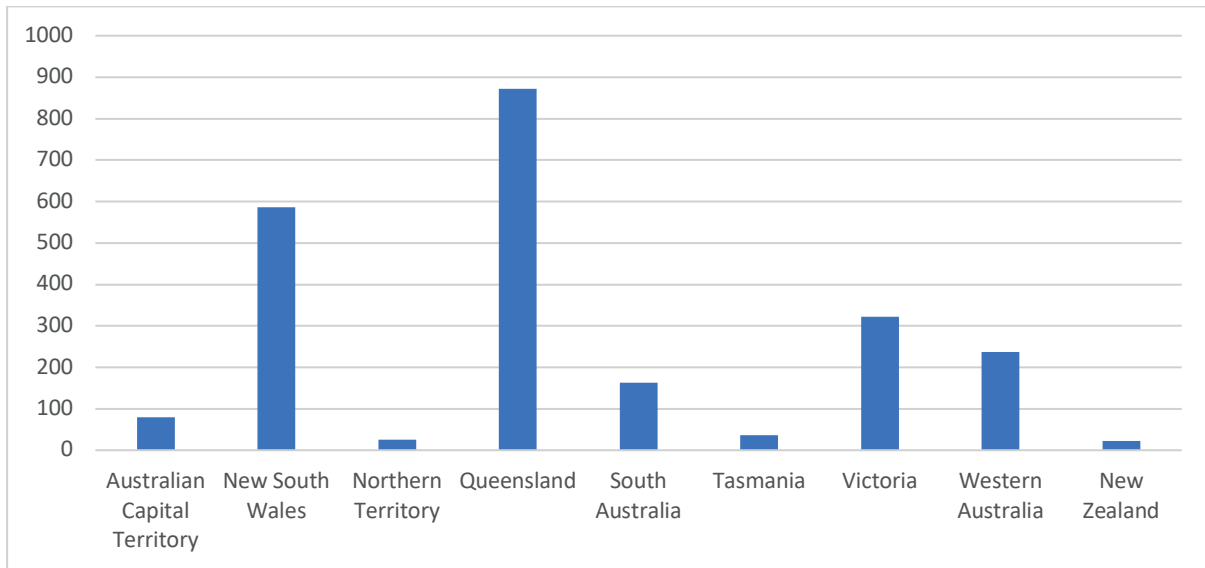
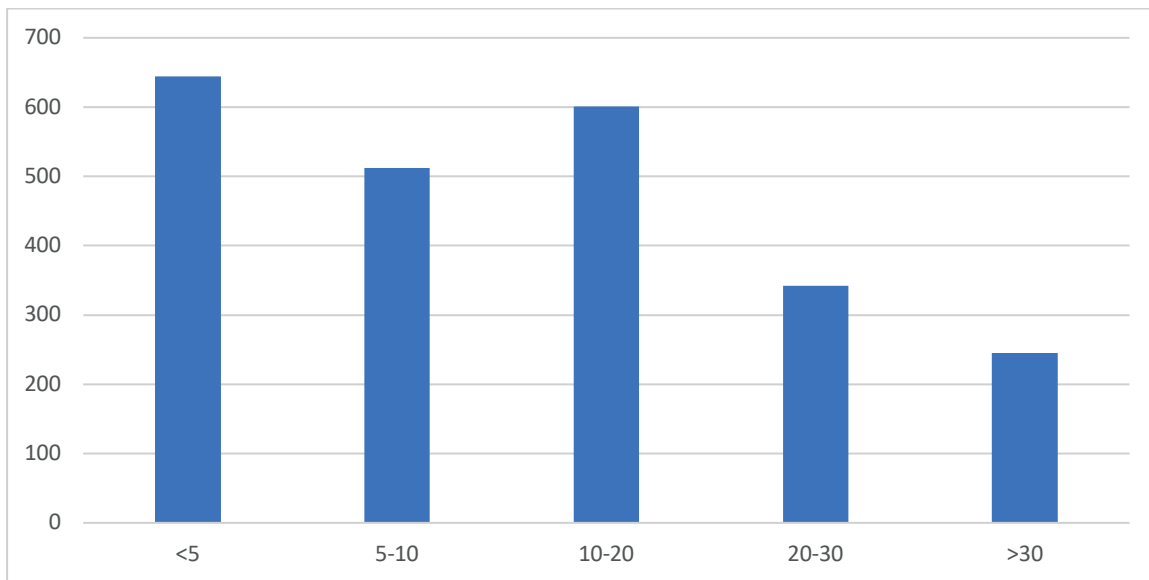


Figure 3: Number of years as part of the veterinary industry



Level of Support for Registration of Veterinary Nurses

Overall, there was strong support (88% either strongly agree or agree) for registration of veterinary nurses and this support was generally across all respondent types, locations and years of experience within the veterinary industry as noted in figures 4-6.

Figure 4: Support for registration

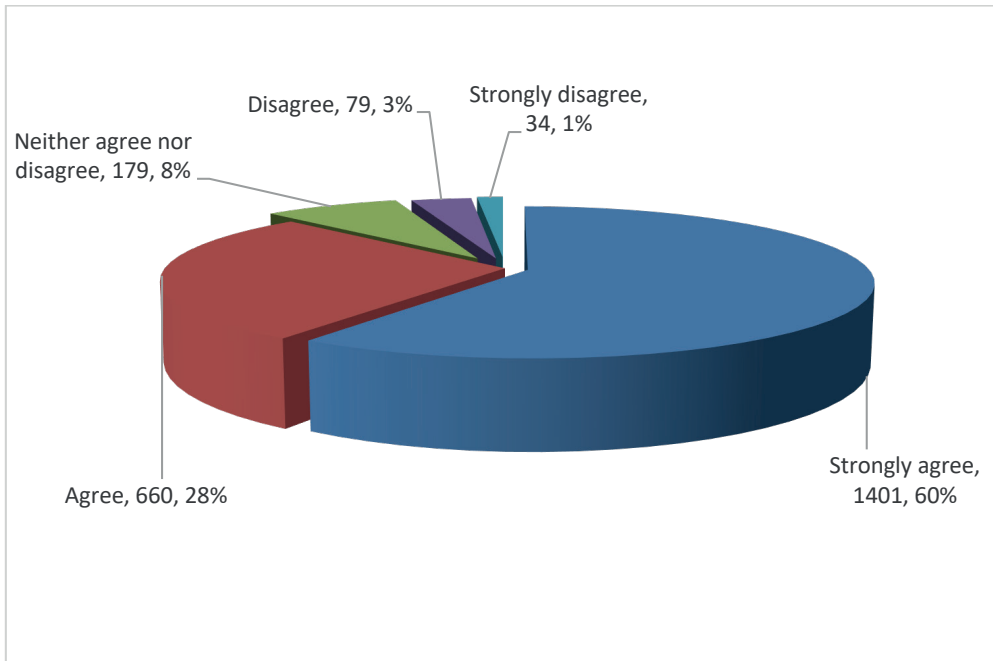


Figure 5: Support for registration by role

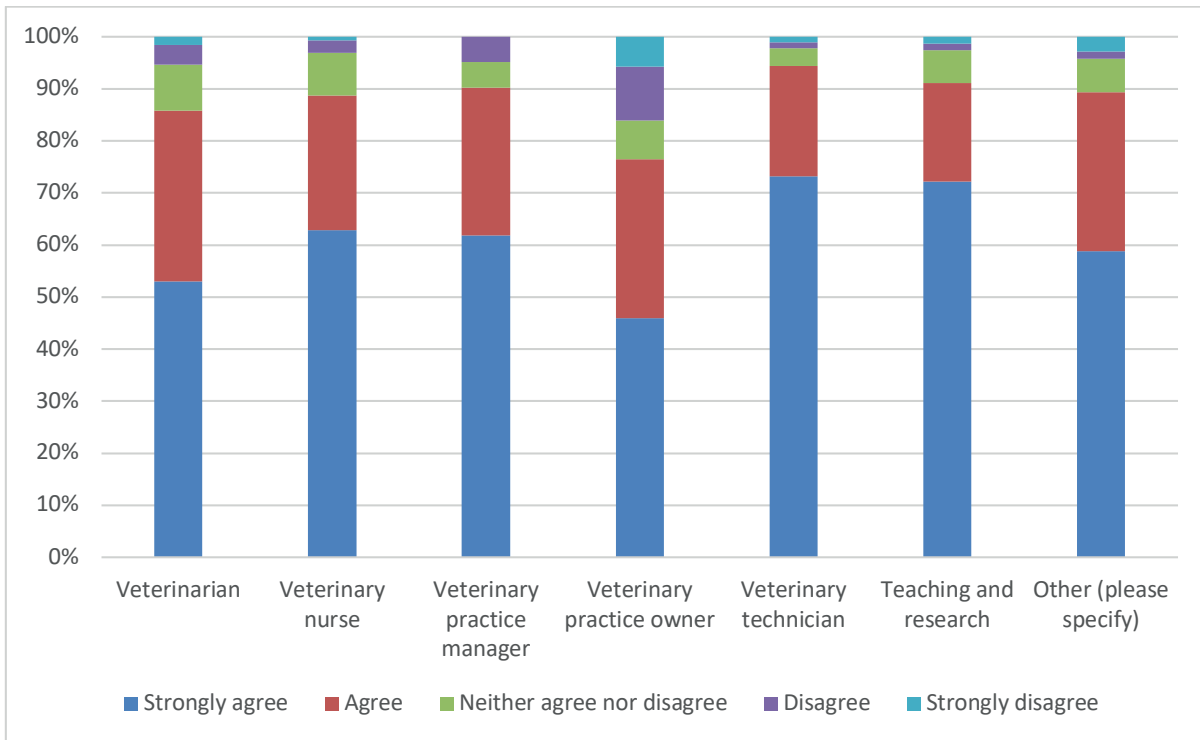


Figure 6: Support for registration by location

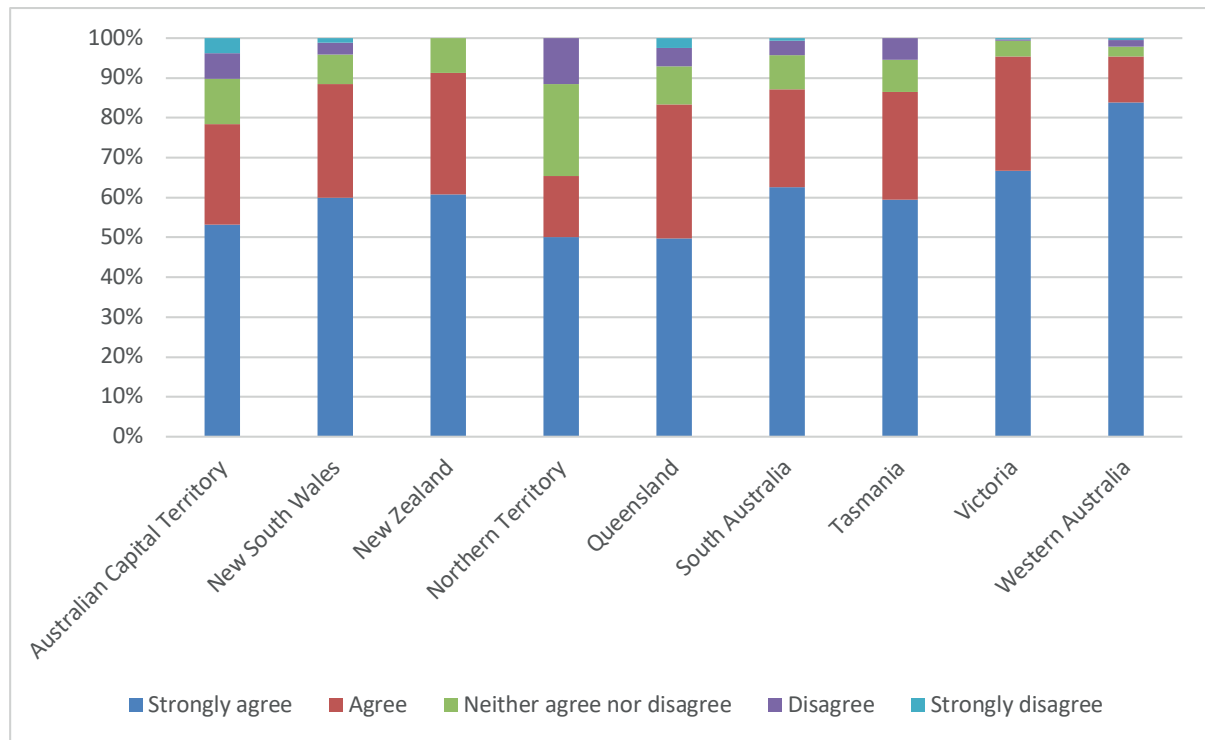
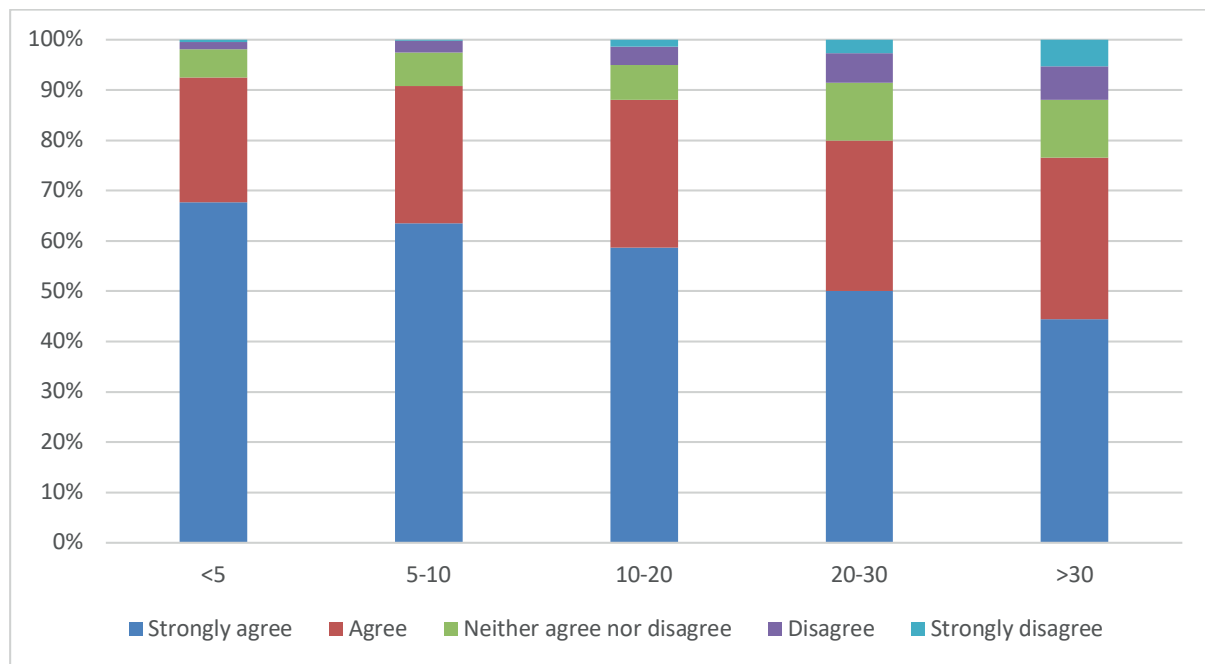


Figure 7: Support by years of experience within the veterinary industry



Potential advantages of registration of veterinary nurses

Almost 80% of respondents strongly agreed or agreed that the registration of veterinary nurses would lead to improvements in animal welfare and improvements in the efficiency of delivery of veterinary services (see Figures 8 and 9). There was generally less support (see Figures 10-12) for the other potential advantages suggested of reducing the impact of the veterinary shortage, reducing burnout and stress within the veterinary profession, and reducing the cost of veterinary services to the public (42%, 53%, and 25% agreement respectively).

Figure 8: Improvement in animal welfare

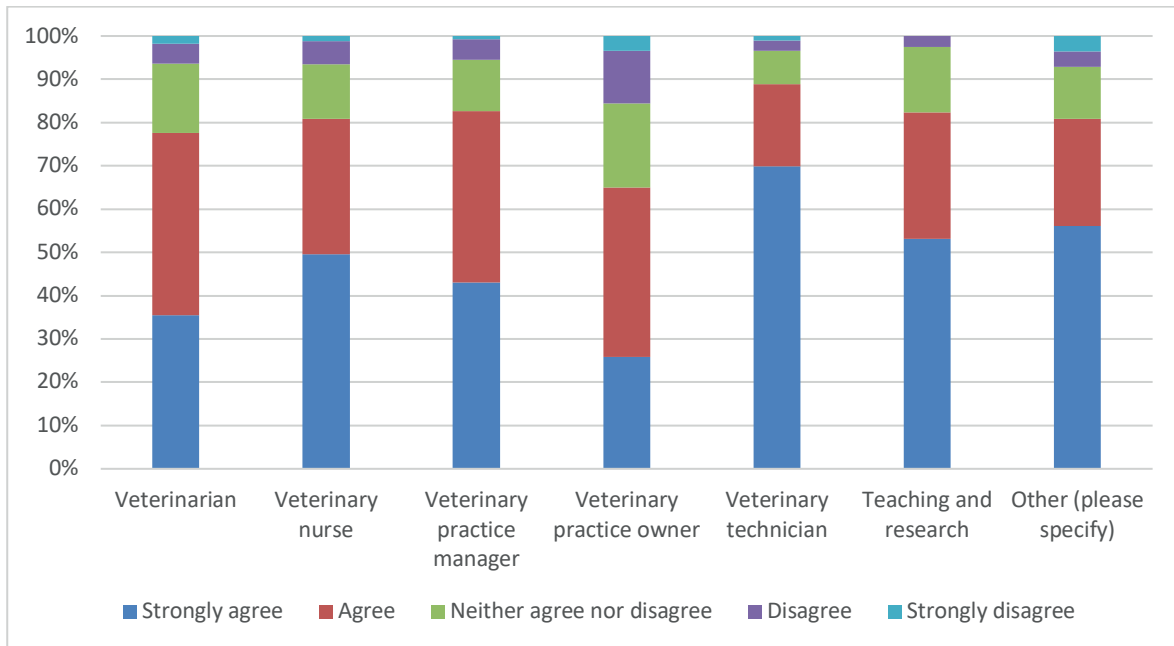


Figure 9: Improve efficiency of delivery of veterinary services

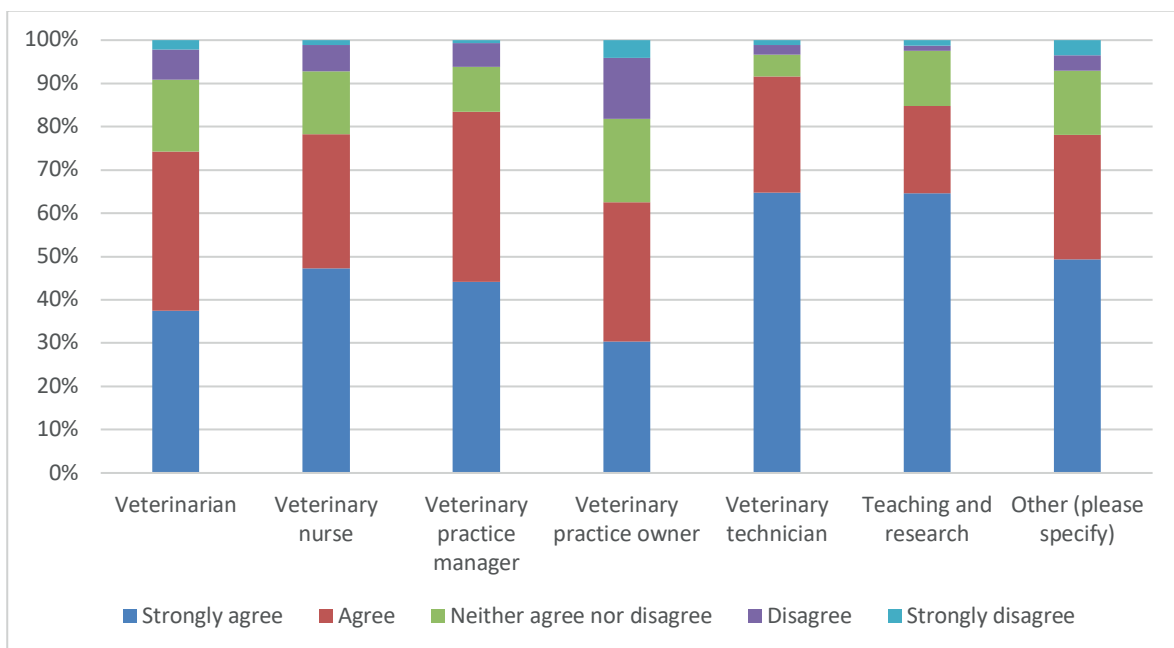


Figure 10: Reduce impact of the veterinary shortage

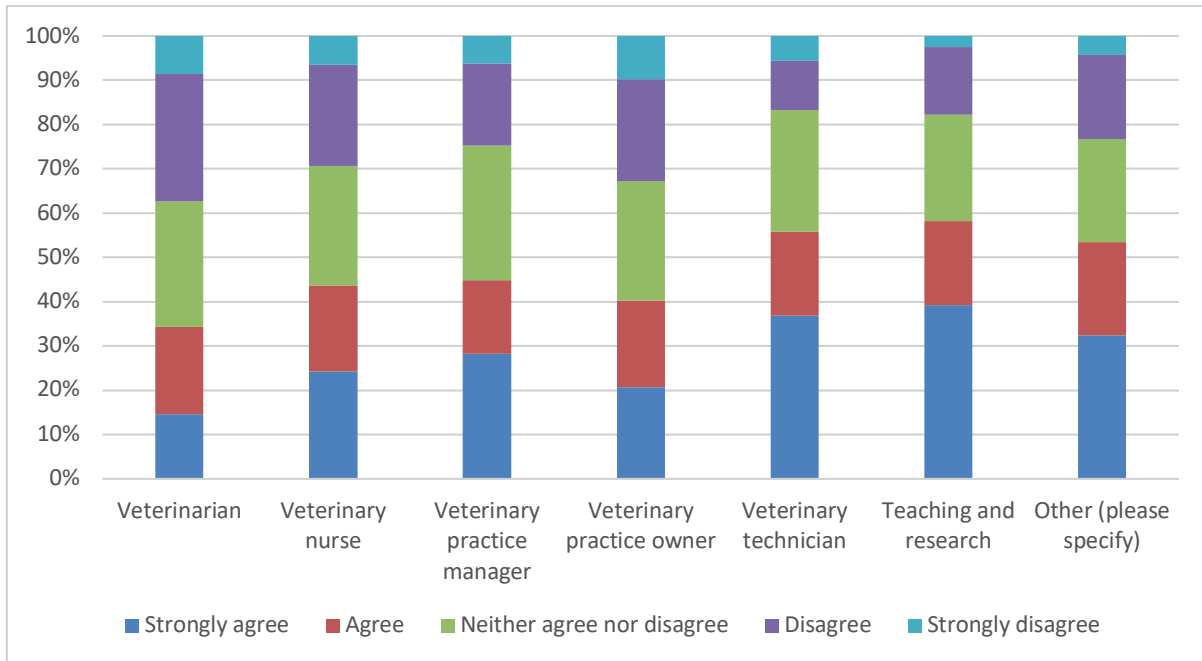


Figure 11: Reduce burnout and stress within the veterinary profession

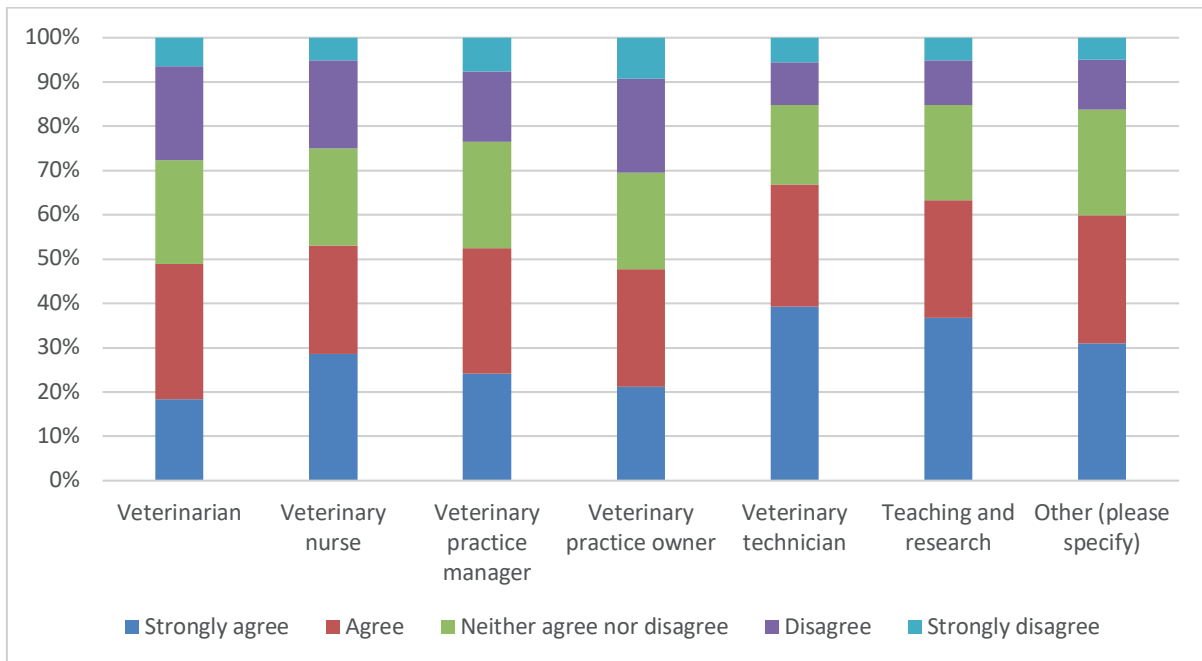
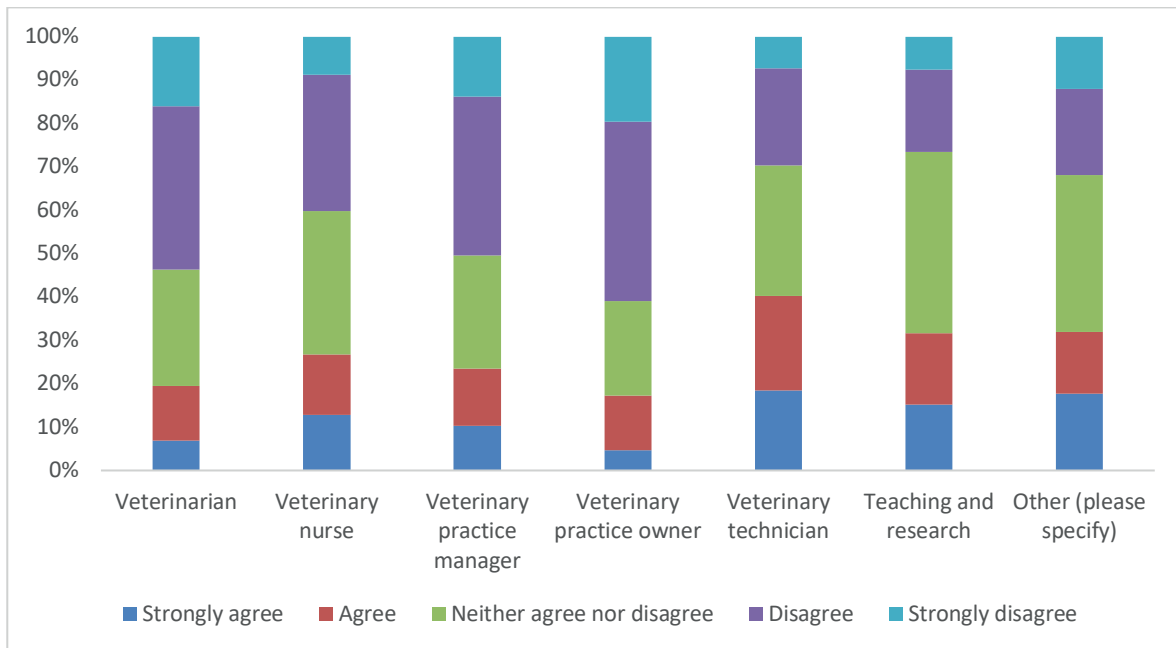


Figure 12: Decrease the cost of veterinary services



Potential disadvantages of registration of veterinary nurses

Just over 50% of veterinary practice owners who responded to the survey agreed or strongly agreed that registration of veterinary nurses would increase costs for practice owners (Figure 13). However, overall, a minority of respondents agreed that registration of veterinary nurses would lead to increased costs for veterinary practice owners (39%), create an unnecessary regulatory burden for veterinary practice owners (15%), impose an unnecessary cost on individual veterinary nurses (29%), or erode restricted acts of veterinary science (22%) (see Figures 14-16).

Figure 13: Increased costs for practice owners

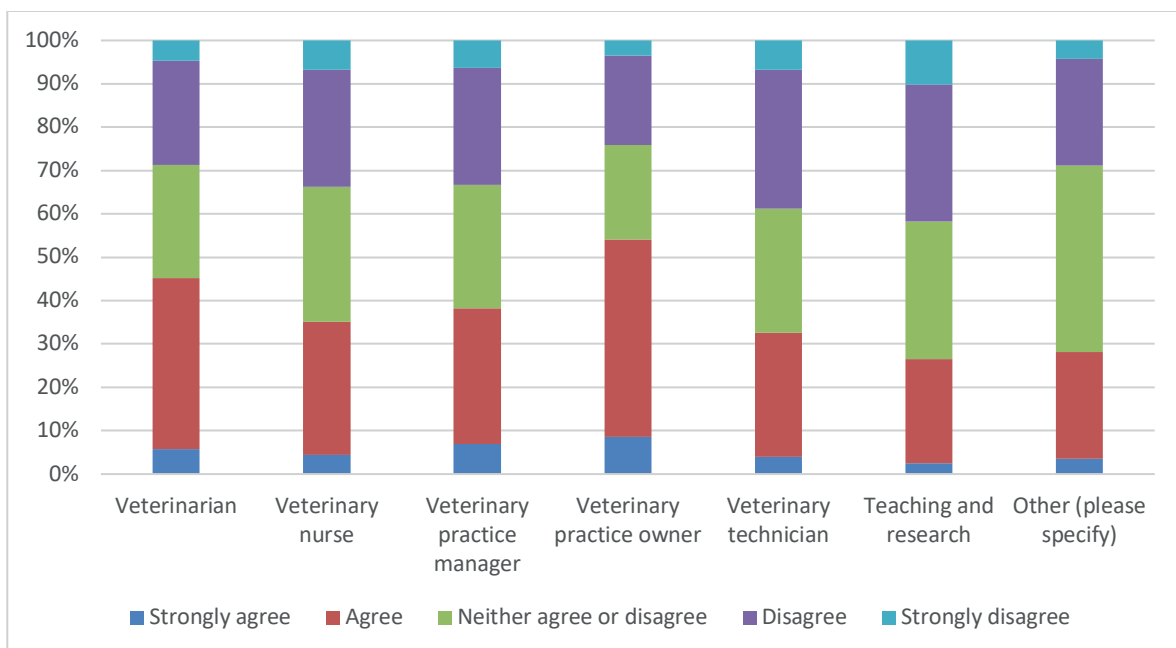


Figure 14: Create an unnecessary regulatory burden on practice owners

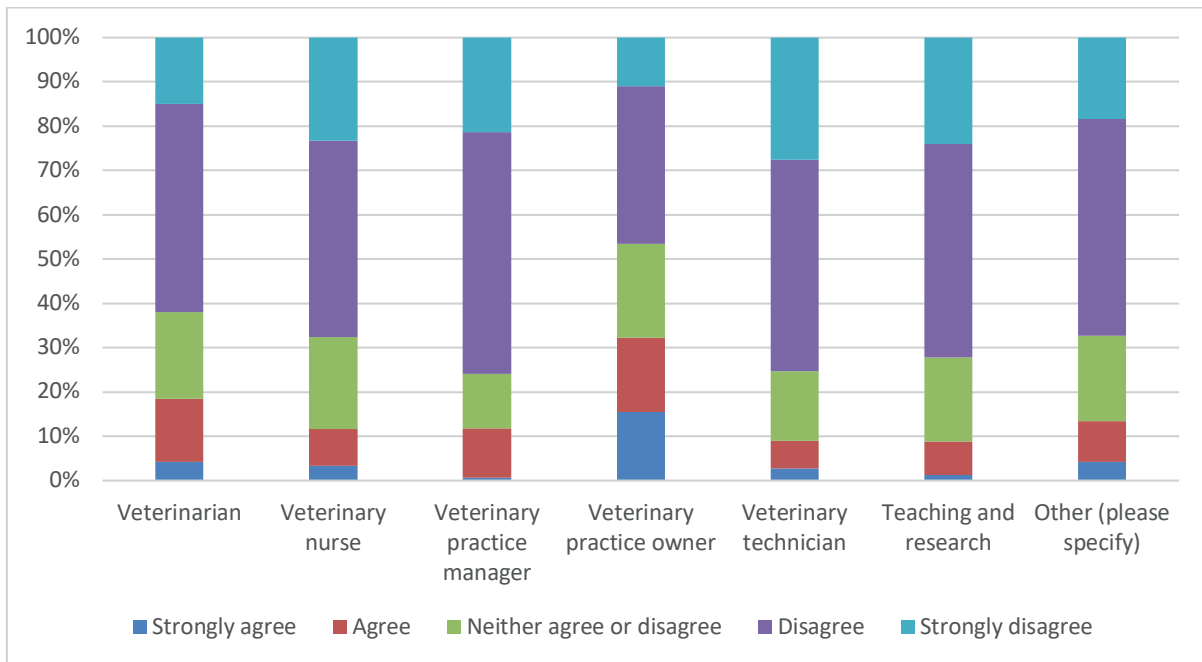


Figure 15: Create an unnecessary cost on individual veterinary nurses

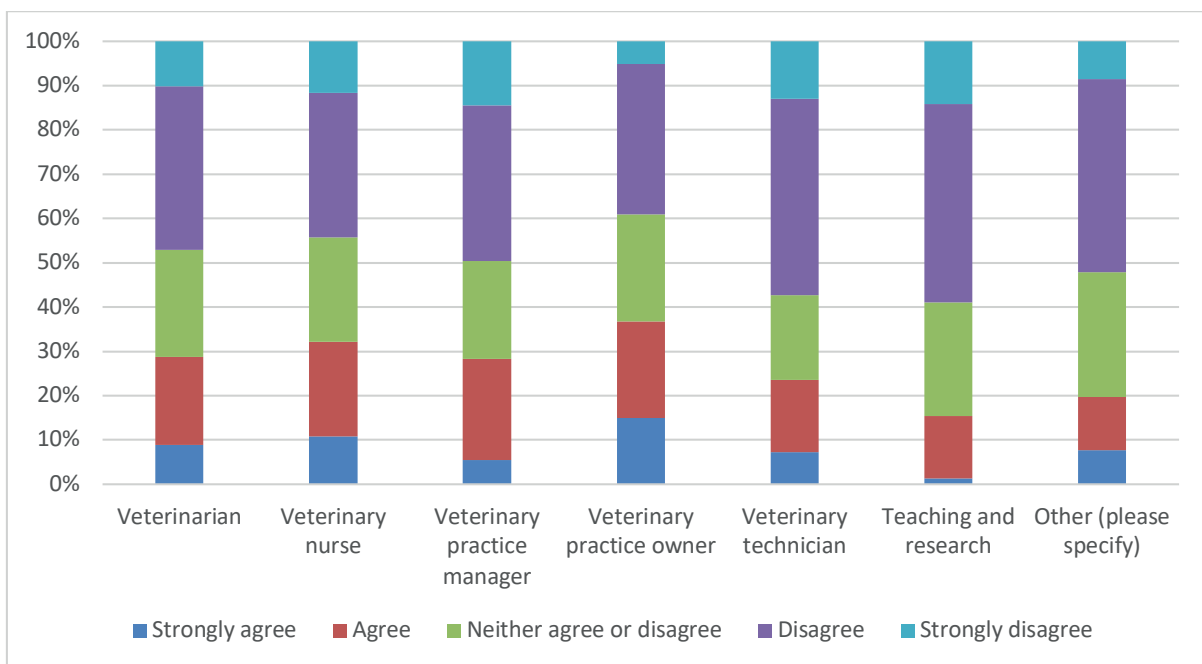
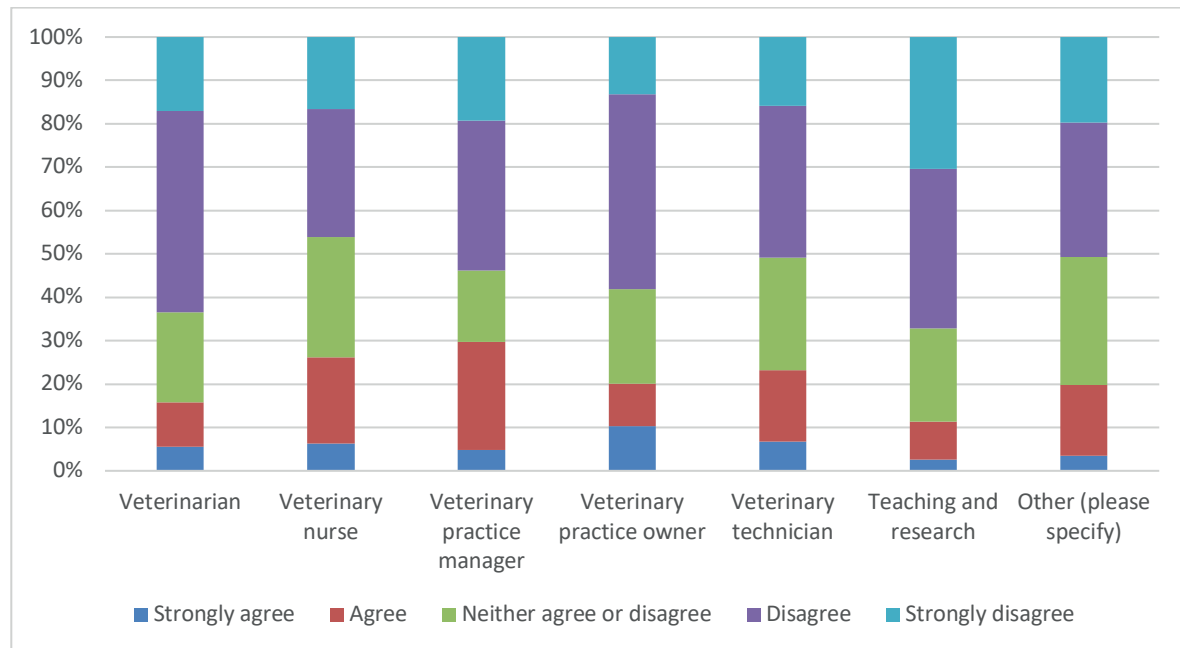


Figure 16: Erode restricted acts of veterinary science



Favoured option for regulatory body

Respondents were also asked to rank their preferences from 1-3 (1 being the highest) for the type of registration body responsible for registering veterinary nurses. Based on average scores from all respondents, the most favoured was a national regulation system administered by an independent body representing veterinarians and veterinary nurses (1.7) followed by national regulation administered by an independent body representing veterinary nurses (1.9) and with state-based regulation via local veterinary boards (2.3) the least favoured option.

All types of respondents by role preferred the most favoured option above with the exception of veterinary nurses who slightly favoured an independent body representing veterinary nurses (1.7) to an independent body representing veterinarians and veterinary nurses (1.8) (Figure 17). No inferential statistics were provided to determine whether this difference was significant.

All respondents by location preferred the most favoured option above with the exception of those from New Zealand (23) who preferred an independent body representing veterinary nurses (1.4) to an independent body representing veterinarians and veterinary nurses (1.9) (Figure 18). No inferential statistics were provided to determine whether this difference was significant.

Minimum qualification requirements for registration

The majority of respondents suggested a Certificate IV should be the minimum level qualification for registration as a veterinary nurse (56%), followed by a diploma (22%) and a bachelor degree (19%). The strongest level of support for a bachelor degree qualification was from veterinary technicians and respondents in the area of teaching and research (Figure 19).

The majority of respondents (74%) also favoured an initial, limited period, whereby persons currently employed as veterinary nurses who had appropriate skills and experience but no formal qualification could be registered and this was generally consistent among all respondent types and by location (see Figure 20 and Figure 21). The respondent's response to minimum level of qualification required for registration similarly did not appear to affect this level of agreement for an initial period of registration for persons with no formal qualifications (Figure 22).

Figure 17: Registration body preferences all respondents

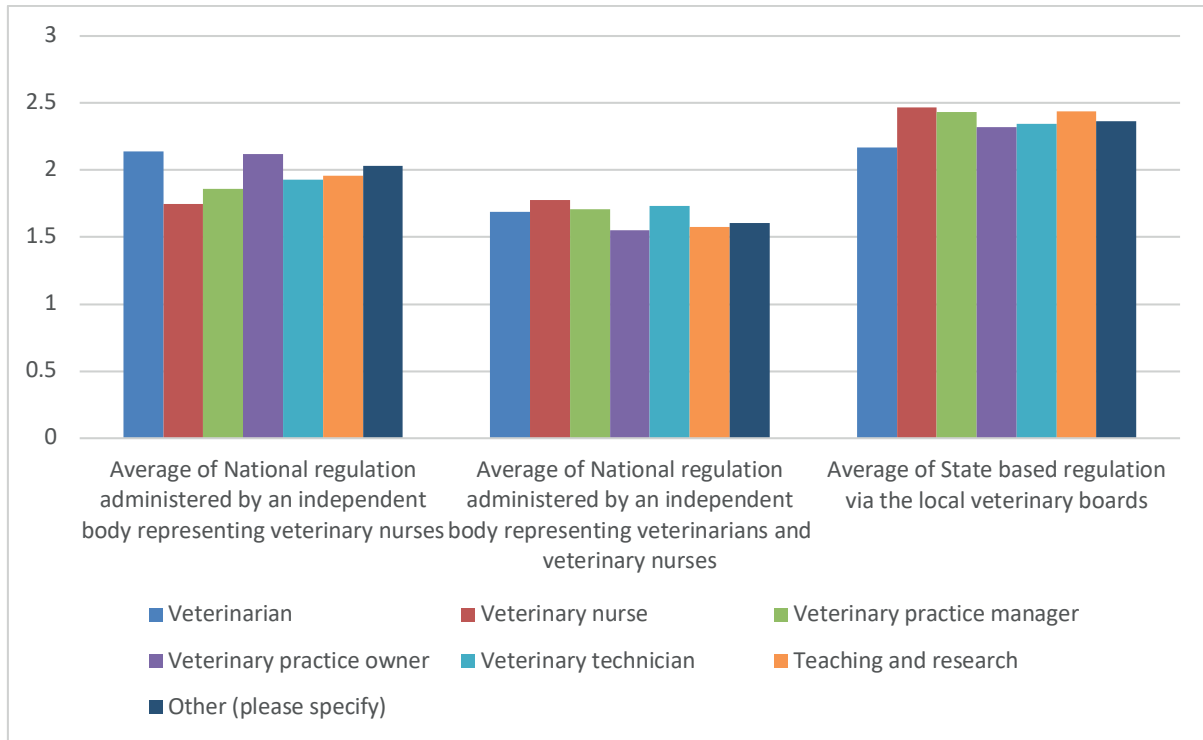


Figure 18: Registration body preferences by location

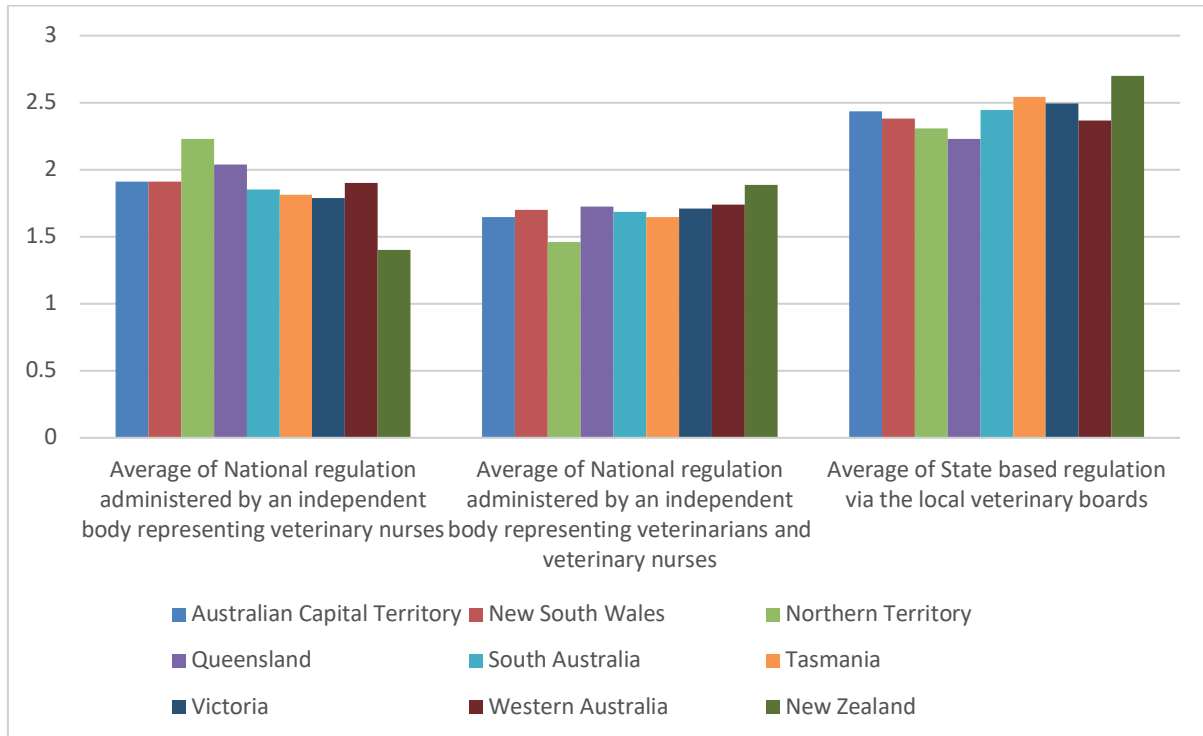


Figure 19: Minimum qualification by respondent type

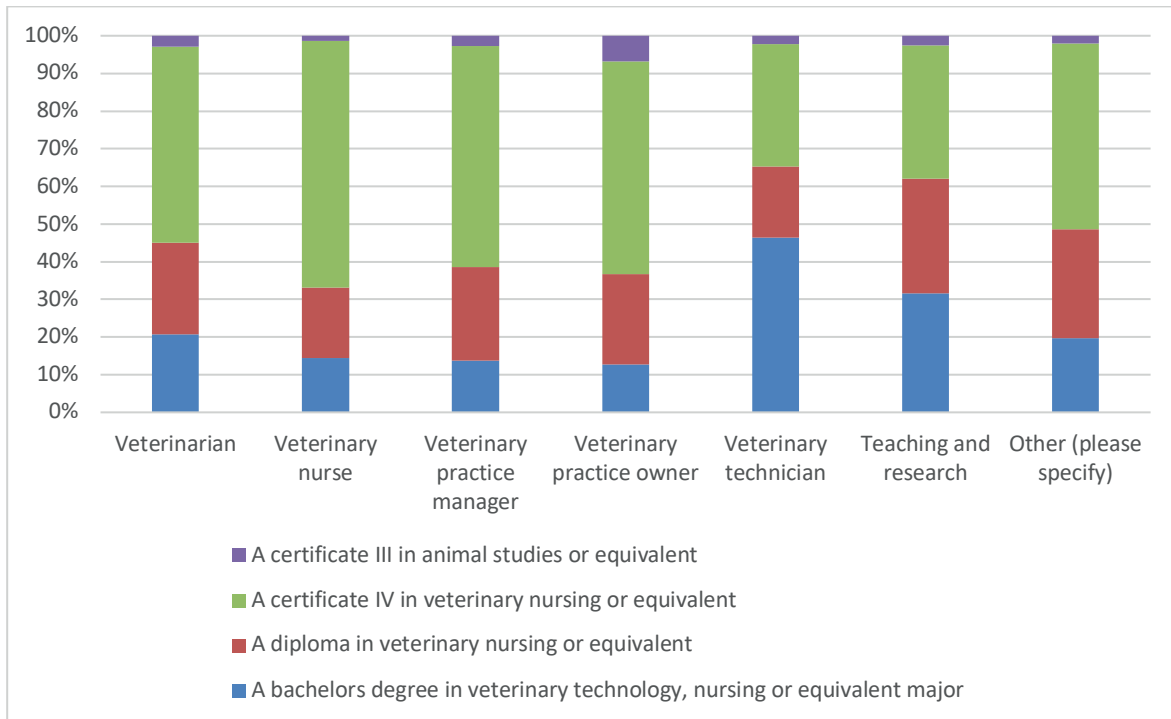


Figure 20: Level of agreement for an initial period of exemption of qualification requirements for registration by respondent type

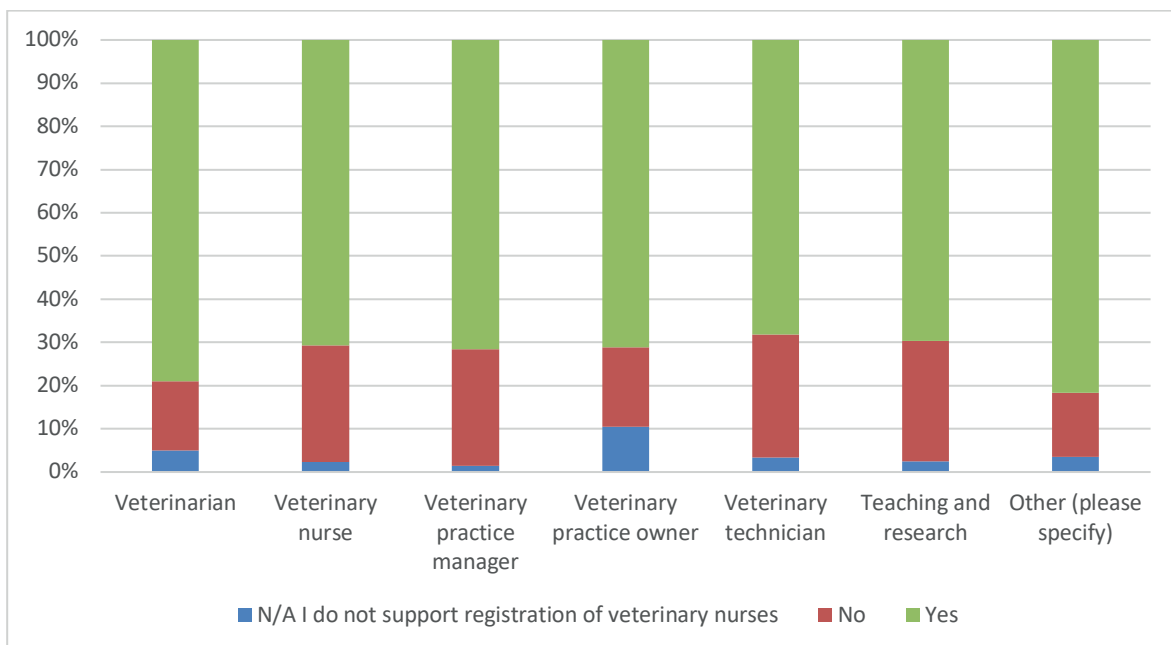


Figure 21: Level of agreement for an initial period of exemption of qualification requirements for registration by location

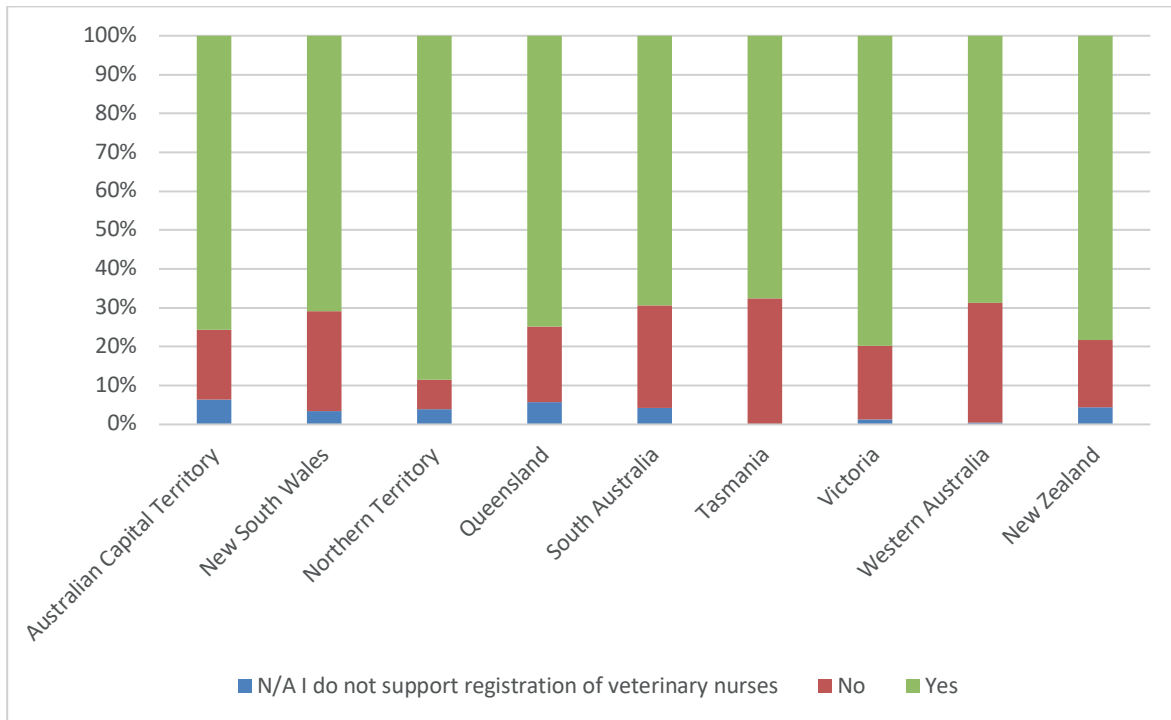
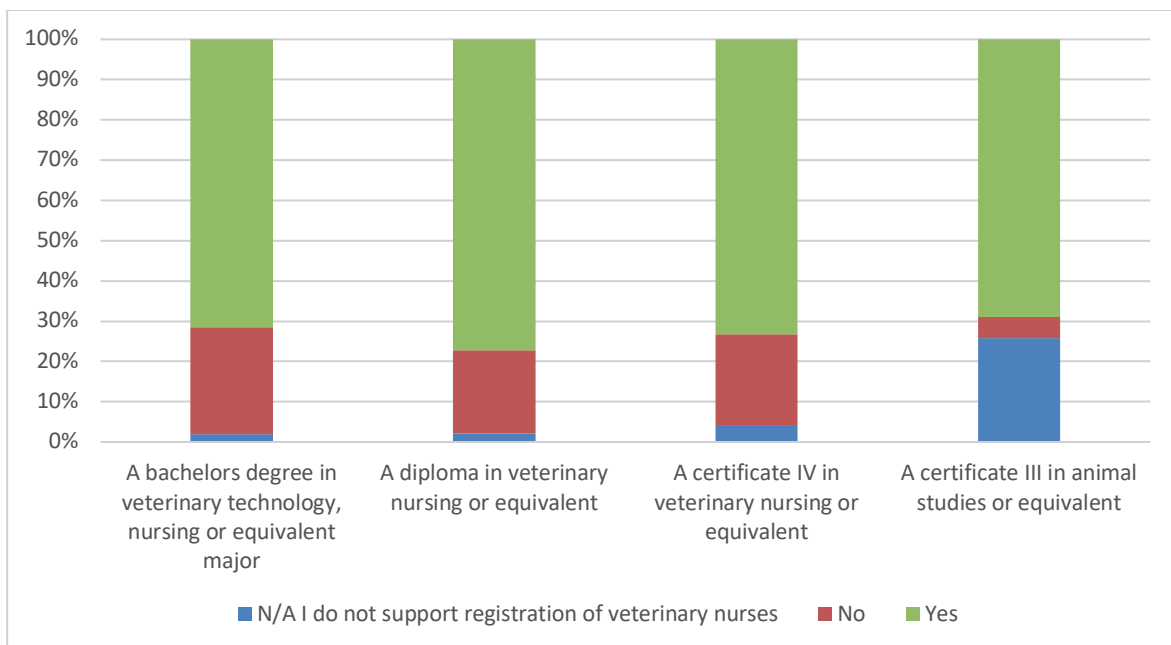


Figure 22: Level of agreement for an initial period of exemption of qualification requirements for registration by preferred minimum qualification response



Summary of Open Comments

Respondents in favour of registration generally commented on the following themes:

- Improved career pathways and reduce attrition
- Increased recognition for veterinary nursing skills and knowledge by both the industry and the public
- Improvements in productivity within practices as veterinary nurses take on additional roles and have their skills utilised.
- The importance of defining permitted tasks to improve clarity of role.
- The importance of encouraging and ensuring veterinary nurses complete mandatory CPD.
- The importance of changes to ensure a flow on effect of increased wages
- The importance of protection of title

'Registration of veterinary nurses and veterinary technicians is essential for the progression of the veterinary profession.'

'Protect the vet nurse title, non -qualified means not a vet nurse.'

'It has to happen. Australia has to catch up to the rest of the English-Speaking world. Registration provides accountability which means that nurses can be given RESPONSIBILITY - with adequate training nurses can do many of the minor procedures / basic consultation advice and laboratory work that vets could do. It would also help provide avenues for nurses to get radiation licences and improve the qualify and autonomy of work that nurses already often do (e.g. anaesthesia, dental procedures, radiographs, etc.). This also helps provides a clear career path for progression - nurses have more to get from their profession and can grow and learn and maybe even choose to remain in the industry.'

'This is essential, not only to recognise veterinary nursing as a real profession but also to allow for accountability for the actions of nurses in practice - just as vets are accountable for their actions. This will give consumers greater confidence in the veterinary services they are paying for.'

'I think in Australia, unless people work in big specialist clinics, we really don't utilise nor recognise the skills of our nursing teams and I think it would be great to do so. Registration gives nurses recognition and also better pay. For that reason I suspect practice owners may resist, but we cannot be a profession that survives because we treat nurses like crap. Not okay.'

'Vet nurses currently have a ceiling that does not allow for or recognise further education and experience - both professionally & with respect to salary. Registration is first formal recognition of their importance to the industry; gives them ownership of their careers and leads the way for future career development. I believe that experienced nurses can perform many of the tasks currently undertaken by veterinarians and will go some way to improving both Practice "life" and the vet shortage experienced by most clinic/hospitals'

'Please help us Nurses!! We are desperate for this. We really need your help to keep the veterinary industry together. We need to fight for our rights in this industry because we LOVE it and are PASSIONATE. Unfortunately those reasons can't keep us in the industry forever. Burn out and poor pay is steering so many AMAZING, SKILLED nurses away from this industry!! Please we need help, we need a reason to keep going as nurses'

'We administer medications, monitor anaesthetics, provide advice and many other tasks that impacts living things, we should not be able to do any of that without a qualification.'

'Great idea but don't make it complicated. Don't give it to individual states. Make it easy and nationwide.'

Respondents with concerns about registration generally commented on the following areas:

- Unnecessary red tape and 'box ticking'
- Limiting employment for those that are unqualified – may increase staff shortages

- Disadvantaging rural practices due to lack of available qualified staff and access to CPD
- Cost associated with registering for VNs with low wages
- On the job trained VNs without qualifications being forced out of work and not recognised.

'We do not need more bureaucracy and the costs involved. Staff shortages are bad enough without restricting the numbers of veterinary nurses.'

'So long as it's undertaken practically, I do think it is a required method that is not yet executed. However, done wrong, it will be a burden. I think it will take thought & if done from a place of good - to support industry quality - not stifle it, then it would be worthwhile. Make it so it rewards quality and is reportable to an independent assessor, not just more red tape that is merely for box checks.'

'I agree with registration, especially to enable more career progression and more varied role/ advanced procedures for nurses to be able to perform in clinic. I worry I wouldn't be able to afford registration on a vet nurse wage however.'

'I believe registration of vet nurses and techs should help to unify the profession across Australia. Also how can we be considered a profession if there are people working as vet nurses who don't have a qualification. The biggest barrier for me in being a registered nurse/tech is cost, I don't have spare money to spend on it regardless of if it is tax deductible or not.'

'Currently many long serving and incredibly knowledgeable veterinary nurses do not hold formal nurse qualifications. It would be terrible for these individuals to lose their careers as much as it would be a loss to the industry. Hasty registration proceedings are likely to push more nurses to leave the industry, increasing the vet nurse shortage and strain on veterinarians and clinics. I fully support a well planned roll out of nation wide registrations and the setting up of an independent vet nurse regulatory board.'

'While I agree with CPD points required for registration - as a vet nurse in a regional area, it is very difficult & expensive to maintain or acquire the current requirement of points needed every year. '

In response to the above concerns, the SPC noted:

- The Certificate IV in Veterinary Nursing is a nationally administered qualification and has been in place since 1998.
- Many organisations offer free CPD that would suit the needs of a qualified veterinary nurse
- Many practices already allow veterinary technicians and veterinary nurses to conduct nurse consultations

Many respondents also sought clarity in relation to the following:

- Duties and procedures a veterinary nurse will be permitted to perform
- CPD requirements
- Grandfathering provisions for those not qualified

'Clear skills and role definition that everyone understands means highly skilled problem solvers can be freed from routine repetitive transactions, the public get better value for money, and everyone in the team is properly accountable.'

'Good idea, but at end of the day experience counts more than certification or registration. Would be a big loss if those unqualified but highly experienced nurses were excluded'

'This is the cart before the horse. You cannot answer these questions objectively without first knowing the proposed scope of tasks to be performed and level of responsibility of registered veterinary nurses.'

The question that is missing is why do veterinary nurses need to be registered?'

'It would be a good idea if allow nurses to do extra jobs eg vaccinations, minor stich ups, xrays etc just as in the medical world. If we register vet nurses and do not allow them to do extra activities in the practice then I am totally against it.'

With respect to duties and tasks, there was a preference from veterinary technicians to be distinguished from veterinary nurses and to be allowed to perform more tasks based on their higher level of qualifications:

'I think there needs to be a clear difference between a vet tech and a nurse. A vet tech does a bachelor degree and should be taking basic consults of the vet not cleaning cages. A nurse who has been in the industry for a long period of time should have the option to further their studies to become a vet tech. Often clinics have no clue what a vet tech is and are often placed as just a nurse. Vet techs have more qualifications than any nurse and should be paid accordingly!'

'Need a separate registration for veterinary technologists to give them some responsibility for certain tasks to take the load off veterinarians - e.g. basic procedures but not prescribing drugs or diagnosing or treating diseases.'

**Australasian Veterinary
Boards Council Inc.**

No. A00390074L

ABN 49 337 540 469

Level 8, 470 Collins Street
Melbourne Vic 3000

Tel: +61 3 9620 7844

www.avbc.asn.au

