CONCERNS AND BACKGROUND TO THE INSPECTIONS 2016

Nine colleagues informed us that they (and other registered colleagues) were not consulted regarding the following points:

- the routine inspections;
- the costs of the inspections;
- the perception that large practices take more time to inspect than smaller practices and that smaller practices are subsidizing large practice inspections;
- the remuneration for the inspector;
- who the inspectors would be for particular categories of facilities;
- whether the inspectors were competent to inspect the specific category of facility;
- what category of facility would be inspected;
- the reason for inspection of a particular category of facility when such a facility was exempted from certain requirements;
- exceptions made in terms of facilities that would not be inspected; and
- exemptions from compliance with the minimum standards granted in the past.

Information given to the profession regarding the routine inspections procedure: -

- In the December 1995 Newsletter, Council announced that all facilities must be registered with Council and that this included animal welfare-, governmental-, private-, training- and research facilities;
- In the July 1996 Newsletter, Council invited members to make input on what would be required for emergency / After Hour clinics and in the same Newsletter confirmed that all facilities had to be registered with Council. However, clarification was given that only clinical facilities had to be registered;
- In the December 1996 Newsletter, Council advised members to ensure that only adequately trained staff should work at emergency facilities and that the equipment was available for such services;
- In the June 1997 Newsletter, Council informed the profession that input on the minimum standards for facilities was pending a response from the South African Veterinary Association [SAVA], after which the inspection [a pilot project] of facilities would commence;
- In the December 1997 Newsletter, Council informed the profession that state veterinarians who practiced privately, after hours had to make arrangements with colleagues to attend to emergencies should they arise from their after-hours work during normal office hours. Furthermore, that it was state policy to only grant permission for state veterinarians to perform locum tenens.
- In the December 1998 Newsletter, members were informed that they should provide Council with any changes to the status of their facilities and the guidelines for independent veterinary shops were published;
- In the June 1999 Newsletter, members were informed that new minimum standards were drafted in liaison with the SAVA. The rules included primary and secondary veterinary services, mobile veterinary services and farm and house calls;
- In the February 2000 Newsletter, Council announced the commencement of pilot inspections and what the evaluation of facilities would entail. An invitation was published for evaluators [inspectors] to make themselves available;
- In the August 2000 Newsletter, Council announced that the pilot inspections project would commence in Pretoria and another invitation for inspectors was published;
In the December 2000 Newsletter, Council provided feedback on the first inspections and informed members of the main deficiencies found, the comments received from practitioners and guidance given;

Updates regarding the facility inspections followed in June 2001, December 2001, March 2002, September 2002, March 2003, June 2003, September 2003, November 2003, March 2004, June 2004, September 2005 [members were informed that inspections would become mandatory], November 2005, March 2006 [members were informed that routine inspections would be held once the regulations were published];

Council published the criteria for inspectors in June 2001;

Members were informed that they could request exemption from the minimum standards of facilities in March 2002 [again in September 2002] and members were reminded that clinical services may not be rendered from unregistered facilities. Members were informed in the March 2003 Newsletter that they had to obtain input from colleagues in the relevant area, when they applied for exemption from compliance with the minimum standards;

In the November 2003 Newsletter, Council informed the profession that vetshops integrated into practices would also be subject to inspection;

Members were again reminded in the November 2005 Newsletter that all facilities had to be registered;

In the June 2006 Newsletter, members were requested to make input on house calls, farm calls and mobile veterinary services and were advised that they could apply for exemption from the minimum standards;

In the March 2008 Newsletter, members were requested to provide input on differential standards for facilities and standards for places where Compulsory Veterinary Community Service [CCS] would be rendered [discussed together with general standards for facilities];

In the November 2008 Newsletter, input was sourced from the profession on standards for alternative veterinary therapy and complementary veterinary therapy. In the June 2009 newsletter provision for limited services were announced;

In the September 2009 Newsletter an explanation was given regarding veterinary facilities and what was required of state veterinarians when they were involved in rendering clinical services;

In the November 2010 Newsletter, Council provided draft regulations for Vetshops and invited input on the draft regulations;

In the March 2012 Newsletter, Council explained the definitions regarding mobile clinical facilities and mobile theatres;

In the June 2012 Newsletter, Council requested the members of the veterinary professions to make input on the budget, specifically as follows:” Routine inspections and accreditation will become a regular function as the Amendment Bill will soon be enacted. What is your opinion, must a facility accreditation fee be charged to fund the inspections and the activities of the Inspections Committee?”;

In the September 2012 Newsletter, Council informed the profession that an audit of nine hundred facilities, registered with Council at that time, was finalised and that routine inspections were to be introduced in 2013. One hundred and fifty facilities would be inspected annually and that every facility would be inspected once in a six-year cycle;

In the same insert in the Newsletter, Council invited input as follows:” Members have been requested to make input on future budgets and the question was posed as to whether a facility registration or an inspection fee should be charged. Your input on the question will be appreciated” Furthermore, members were informed of the outcome of the facility audit and the requirements at that stage;
In the November 2012 Newsletter, members were again advised to make input on the budget and a statement was then made that: "...Routine Inspections will fund themselves as they are based on the user-pays principle."

In the March 2013 Newsletter, Council again announced the routine inspections and provided answers to frequently asked questions i.e. which facilities would be inspected and which facilities would be inspected first; how it would be funded; how the principal will be informed of the inspection and who would qualify as inspectors;

In the same Newsletter members who practiced as consultants and as herd health practitioners were invited to make input on the minimum standards; and members were invited to comment on complementary veterinary services, checklists for facilities, mobile facilities and exemption as well as training for vetshop staff members;

In the March 2014 Newsletter, members were invited to comment on the review of the rules and a reminder given that veterinary services may only be rendered from registered facilities;

In the June 2014 Newsletter, Council invited members to the workshop on Highly scheduled medicines and the workshop on Minimum Standards for facilities and a report was published in the Newsletter September 2014 on the workshop with another invitation for comment;

In the November 2014 Newsletter, Council published an alert on “…veterinarians practicing from unregistered facilities and/or from no “structured” facilities and other important things!!!”

In the September and December 2015 Newsletters, Council informed members on requirements for laboratories and research facilities as well as for the new categories. Members were invited to provide input;

Council also provided an explanation on “Routine Inspections” including that it was a self-funded process.