

Baroness Hayman of Ullock,
Minister for Animal Welfare and Biosecurity
VSA Reform Consultation
Dept for Environment, Food and Rural Affairs

23 March 2026

Dear Baroness Hayman,

Consultation on reform of the Veterinary Surgeons Act (1966)

I am writing, as the statutory registrar for chiropractors, concerning the current consultation into reform of the Veterinary Surgeons Act.

The General Chiropractic Council (GCC) is the statutory regulator for chiropractors, established by Parliament under the [Chiropractors Act \(1994\)](#). We protect the public by setting standards for practice and education, and by acting where those standards are not met. My role is not to promote or lobby on behalf of the profession, but to consider the health and safety of the public.

As a regulator, we broadly welcome the proposal to reform and modernise the regulation of the veterinary sector in light of changes to both the veterinary landscape, and modern regulatory practice. I am impressed with the comprehensive approach to the proposals which will, in many regards, provide better regulation and protections in the veterinary sector than in private human healthcare.

We agree with the finding of the consultation document that animal musculoskeletal care (which would include “animal chiropractic”) is a growing profession and consider the reform of the Veterinary Surgeons Act to be a timely and welcome opportunity to bring Allied Veterinary Professionals (AVPs) into regulation.

The proposed mechanism of secondary legislation to introduce protected titles and standards for AVPs is a proportionate approach which will ensure the new regulator can remain agile in the face of a changing veterinary landscape.

That said, we wish to supplement the debate and highlight where careful provision in the primary legislation may be provide certainty to the public, strengthen regulation and create flexibility within which the new regulator can act.

The state of “animal chiropractic” in the UK

There is a long tradition (predating the Chiropractors Act) of chiropractors treating both humans and animals. The traditional route was for students to qualify treating humans and then undertake postgraduate study to extend their practice to animals. More recently we have seen individuals leave the register to focus exclusively on treating animals, and “animal only” chiropractic courses growing in popularity.

Our research in 2025 found 310 individuals who advertised that they treated animals with chiropractic techniques. Of these, less than a third (93) were also registered with the GCC.

On this evidence, our belief is that animal and human chiropractic care are separating into related, but independent, professions.

Considerations for the primary regulations:

While the progress in developing voluntary registers ([RAMP](#) and [AHPR](#)) should be applauded, and demonstrates the appetite from existing practitioners for regulation, this should not be a replacement for statutory oversight of the profession.

The natural outcome of the separation into “human” and “animal” chiropractic professions might be the regulation of animal practitioners as an Allied Veterinary Profession (by the new veterinary regulator), distinct and separate to human practitioners.

We “strongly agree” with such an approach (question L2PQ7 in the consultation), together with the proposal to use secondary legislation to bring new professions into regulation as the new veterinary regulator sees fit.

Whether animal chiropractors should be titled as one Allied Veterinary MSK Profession (covering chiropractic, osteopathic and physiotherapy) or separate titles based on training and technique is a decision for the new veterinary regulator (question L2PQ8). We would highlight some points that may need to be considered at the primary legislation stage to allow the new veterinary regulator the flexibility to make this decision unencumbered by legal argument. This may apply across all the MSK professions, but will illustrate the issues with chiropractic (question L2PQ7b):

1) Dual Registration

We think it likely (particularly at the outset of regulation) that some who wish to practise both disciplines will require dual registration (as both human and animal practitioner). This need not be problematic, so long as it is considered as the legislation is drafted.

2) Extent of existing regulation of chiropractors

The GCC has always treated its statutory remit as relating to the treatment of human patients (consistent with later amendments confirming that our overarching objective is protection of the public)¹. Neither our Professional Standards nor our Education

¹ For instance, the Health and Social Care (Safety and Quality) Act 2015

Standards cover animal care and we are not aware of any fitness to practise cases that have been brought alleging misconduct arising from the treatment of animals.

Despite this, an argument may arise that, because the Chiropractors Act (1994) does not define a scope of practice (human or animal), our remit is defined only by those who use the title of “chiropractor”. This could be used by individuals seeking to avoid dual registration, or to “pick and choose” who is responsible for a regulatory concern against an individual.

3) Protection of title

The title of chiropractor is protected by [section 32.1 of the Chiropractors Act \(1994\)](#) which states:

A person who (whether expressly or by implication) describes himself as a chiropractor, chiropractic practitioner, chiropractitioner, chiropractic physician, or any other kind of chiropractor, is guilty of an offence unless he is a registered chiropractor.

The Chiropractors Act (1994) does not define who should enforce section 32, but in practice it would likely be the GCC (either by private prosecution or by submission of a case to the Crown Prosecution Service). In deciding whether to prosecute, we must consider whether there is sufficient evidence for a prosecution (the evidential test) and whether a prosecution is required in the public interest (the public interest test).

Our pragmatic view has been that prosecuting a person using the title of “animal chiropractor” would be unlikely to pass the evidential test, or the public interest test, unless there was indisputable evidence of a risk of harm to human patients (as the act is intended to protect the public).

Some registrants disagree and have raised the issue, believing that we should read section 32 literally, that the evidential test is met by using the title in any form, and the public interest is in the ‘devaluing’ of the title.

Whatever the legal situation, many “animal only” practitioners consider that they may use the title so long as they only treat animals – but their belief is based on custom rather than a legal right and regulatory certainty.

Reform of the Veterinary Surgeons Act (and the secondary regulation of animal chiropractors as Allied Veterinary Professionals) is an opportunity to provide regulatory certainty for all who wish to use the title of chiropractor, and ultimately protect the public from unregistered practitioners, by unambiguously protecting the titles of “animal chiropractor” and/or “veterinary chiropractor”.

However, if this opportunity is to be available to the new veterinary regulator, the primary legislation may require a provision to adjust section 32 of the Chiropractors Act (1994). This provision would be reserved for implementation by a commencement order in the appropriate secondary legislation.

4) Scope of practise

We note the proposed approach defines Veterinary Acts (protecting scope as well as title); however, we suggest that it may not go far enough (question L2PQ1).

In our experience, as the Chiropractic Act does not define activities performed by a chiropractor, it can be difficult to protect the public from an individual who has been removed from the register choosing to continue to work under a different job title.

While the Veterinary Acts described adequately meet the requirements of a Veterinary Surgeon or Nurse, there may need to be a wider definition in the primary legislation of the acts that would be considered the remit of an Allied Veterinary Professional.

This would provide a stronger foundation for the regulation of Allied Veterinary Professionals through secondary legislation and prevent those who are later removed from a register (or who try to avoid registration) from attempting to “side-step” the regulations and mislead the public by rebadging their technique.

In conclusion

The secondary legislation approach seems like the right way to introduce the regulation of Allied Veterinary Professionals, but it may be benefit from early consideration when drafting primary legislation, to ensure that the new veterinary regulator is able to act with the flexibility it will require.

We support the proposals and look forward to working with both Government and the new veterinary regulator as the legislation develops.

Yours sincerely



Nick Jones

GCC Registrar and Chief Executive Officer