

GOC consultation report: Lifetime registration number

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Introduction

The General Optical Council (GOC) is the regulator for the optical professions in the UK. Our mission is to protect and promote the health and safety of the public. We currently register around 30,000 optometrists, dispensing opticians, student opticians and optical businesses.

We ran a short, targeted consultation for key stakeholders (from 19 August to 30 September 2020) on our plans to introduce lifetime registration numbers for the following registrant groups:

- new registrants joining our register as students;
- new registrants joining our qualified register as optometrists or dispensing opticians, having successfully applied via the non-UK registration process;
- new registrants joining our register as corporate bodies;
- registrants joining the qualified register having previously been student registrants;
- individuals who restore to our register, for example, after a career break or after being removed from the register for failure to meet our CET requirements; and
- business registrants who restore to our register.

We did not propose to change registration numbers for existing registrants as this would likely place a significant burden on both the GOC and key stakeholders. The aim of the consultation was to help us understand any impacts that this policy may have on external stakeholders.

Visit our website for more information on how our [registration system](#) works.

Summary of key findings

We received 14 responses in total from organisational stakeholders including professional associations and representative bodies, education providers and wider healthcare bodies.

- Overall, the majority of respondents agreed in principle with our proposal to introduce lifetime registration numbers. Some advantages identified by stakeholders included:
 - consistency with the approach of the General Medical Council (GMC) and the General Dental Council (GDC);
 - an easy to trace career path for students; and
 - a single lifetime registration number is a more sensible approach particularly for registrants and businesses who leave the register then re-join.
- In the consultation, we also asked about the format of the new numbering system, which would be a single generic number for all registrants, replacing the current format which identified students, dispensing opticians,

optometrists and business registrants. Most stakeholders, said this proposal would have no impact on them or their organisation, but there were some potential impacts identified, for example:

- Introducing a generic lifetime registration number related to removing information that helped identify the status of a registrant could impact stakeholders and cause issues. Currently, a prefix, such as 'O' for optometrists or 'D' for dispensing optician, helps identify a registrant. Removing this would potentially make it harder to distinguish between, for example, an optical student and a fully qualified registrant, and a fully qualified optometrist and a dispensing optician. Removing this could also have an impact on applications for the NHS Performance list, for example, when the NHS assess applications, they require a clinical reference from an individual who is the clinical equivalent (i.e. a dispensing optician can provide a clinical reference for another dispensing optician but not for an optometrist). By removing the different prefixes, they would not be able to check this.
- A single lifetime number would not show gaps for registrants who may have come on and off the GOC register several times throughout their career. This could be an indication of performance issues, and so removing information relating to the latest date of registration would not allow stakeholders to verify this, particularly in cases where the registrant may withhold such information.
- Running a dual system would also have potential administrative, resource and cost implications for some stakeholders involved in delivering Continuing Education and Training (CET), in terms of uploading CET points. Stakeholders asked how long the two systems would run in tandem for.
- Stakeholders questioned how the lifetime registration number will impact on information available on the register, for example, if an optometrist is suspended, will the register still show this?
- Some stakeholders asked the GOC for more information and clarity on the format of the proposed new generic numbering system based on the concerns listed above.

GOC's policy decision

We would like to thank all those who responded. We have considered all the consultation responses and in short, we will introduce lifetime registration numbers with a prefix to help identify registrant type for the following groups of registrants:

- new registrants joining our register as students;
- new registrants joining our qualified register as optometrists or dispensing opticians, having successfully applied via the non-UK registration process;
- new registrants joining our register as corporate bodies;
- registrants joining the qualified register having previously been student registrants;

- individuals who restore to our register, for example, after a career break or after being removed from the register for failure to meet our CET requirements; and
- business registrants who restore to our register.

We have taken on board consultation feedback particularly in relation to concerns raised by some key organisational stakeholders about removing the prefixes. We recognise that moving to numeric only registration numbers will present more of a challenge in quickly identifying registrant types for some stakeholders, such as employers, the NHS, and education providers. However, our view is that a more accessible register, built on a web platform optimised for mobile devices, will allow simple, quick checks and we would strongly encourage regular checks on registrant statuses as essential best practice in all types of interactions as referenced above.

We also recognise that for existing systems used by stakeholders to manage registrant data there could be an impact on administrative burden beyond that which we considered in the initial impact assessment, for example, in relation to the allocation of CET points or regular administrative tasks undertaken by larger registrant employers.

We will therefore introduce a lifetime number with prefixes to help identify registrant types, for example, students would keep the numeric part of their number for life, with prefixes updated to show changes in status. In practice this would mean:

- SO-12345 for a student optometrist would then become 01-12345 upon joining the fully qualified register. SD-12346 for a student dispensing optician would then become D-12346.
- Body Corporate (BC) registrants would keep the CO prefix and new BC's will be identified as CO-12347, for example.

We will introduce a new numbering system to coincide with the new registration/financial year beginning on 1 April 2021.

Background to consultation

Work is underway to redevelop the current GOC website and MyGOC portal to improve the user experience and to enable our registrants to do more tasks online and on mobile devices. As a key part of this work, we are proposing to introduce a lifetime registration number.

One of the main advantages for introducing lifetime registration numbers for the registrant groups listed above is to avoid having to change their GOC number throughout their professional career. This will help to deliver simpler and quicker digital services and a future ambition of a single sign in service for our registrants. In the future, there will be no requirement to ask for previous GOC numbers. Lifetime registration numbers will also help with monitoring and reporting from the GOC perspective and reduce the risk of inaccuracies due to allocation of numbers being a manual process.

We have also heard from stakeholders that the current system can have cost implications for their organisations, for example, if a registrant restores to the register (and gains a new number) they need to be issued with a new prescription pad with their new registration number.

Methodology and respondents

We ran a six-week consultation, from 19 August 2020 to 30 September 2020. This was a closed consultation that we sent to key stakeholders that would be potentially affected by the changes that we proposed. We did not publicly consult on this issue as after completing an impact assessment, we identified that any potential impacts would be on stakeholder organisations rather than individuals or members of the public.

We received 14 responses in total from key optical and healthcare stakeholder organisations, including professional associations and representative bodies, education providers and wider healthcare bodies.

Interpretation of the survey data

This report contains tables and charts. In some instances, the responses may not add up to 100%. There are several reasons why this might happen:

- the question may have allowed each respondent to give more than one answer;
- only the most common responses may be shown in the table or chart;
- individual percentages are rounded to the nearest whole number so the total may come to 99% or 101%; and
- a response of between 0% and 1% will be shown as 0%.

Analysis of consultation findings

Section 1: Introducing a lifetime registration number

In this section we asked stakeholders about our proposal to introduce a lifetime registration number and what impacts, if any, this would have on them.

We asked stakeholders to what extent they agreed or disagreed with our proposal to introduce life registration numbers for the following categories of registrants:

- new registrants joining our register as students;
- new registrants joining our qualified register as optometrists or dispensing opticians, having successfully applied via the non-UK registration process;
- new registrants joining our register as corporate bodies;
- registrants joining the qualified register having previously been student registrants;
- individuals who restore to our register, for example, after a career break or after being removed from the register for failure to meet our CET requirements; and
- business registrants who restore to our register.

We received 14 responses to this question. Overall, the majority of respondents (79%) agreed with the proposal and 14% disagreed.

Option	Total number of respondents	Percent
Strongly agree	6	43%
Agree	5	36%
Neither agree or disagree	0	0%
Disagree	1	7%
Strongly disagree	1	7%
Don't know	1	7%
Not Answered	0	0.00%

We then asked a question about what impact, if any, this proposal would have and asked stakeholders to provide comments on any potential improvements or barriers. There were 14 responses to this question. Overall, 35% of respondents thought that introducing lifetime registration numbers would have a positive impact; the majority, 43%, said that it would have no impact; and 14% thought it would have a negative impact.

Option	Total number of respondents	Percent
Very positive impact	3	21%
Positive impact	2	14%
No impact	6	43%
Negative impact	2	14%
Very negative impact	0	0%

Don't know	1	7%
Not Answered	0	0%

Some examples of positive impacts of introducing a lifetime registration number included:

- consistency with the General Medical Council (GMC) and General Dental Council (GDC) approach;
- an easy to trace career path for students; and
- a single lifetime registration number is a more sensible approach particularly for registrants and businesses who leave the register then re-join.

However, despite the majority of respondents agreeing with our proposal to introduce a lifetime registration number, some thought that this could have a negative impact. One respondent, for example, supported introducing this policy but said it could have negative impact as there would be a dual system for many years. Other respondents said that this would potentially increase administrative cost for them, for example, in uploading CET points, as their system would need to accommodate a dual numbering system.

One respondent said there was not enough information to know what the impact of this policy would have and were concerned if a generic number would still allow them to easily identify a registrant's professional status at each stage of their career and asked the GOC for clarity on this point.

Section 2: Format of a lifetime registration number

In this section we asked respondents about the format of a new lifetime registration number. Currently, different types of registrants are in different formats:

- SD (e.g. SD-1234) student dispensing optician;
- SO (e.g. SO-1234) student optometrist;
- D (e.g. D-1234) dispensing optician;
- 01 (e.g. 01-12345) optometrist; and
- CO (e.g. CO-1234) body corporate.

In order to simplify the process, our proposal was to introduce generic registration numbers for all registrant types. This would also align with the approaches of other regulators such as the GMC and GDC.

We also asked a question about what impact, if any, this proposal would have and asked stakeholders to provide comments on any potential improvements or barriers.

There were 14 responses to this question. Overall, 35% of respondents said that this would have a positive impact; 29% said that it would have no impact; 28% said it would have a negative impact; and 7% didn't know.

Option	Total number of respondents	Percent
Very positive impact	2	14%
Positive impact	3	21%
No impact	4	29%
Negative impact	3	21%
Very negative impact	1	7%
Don't know	1	7%
Not Answered	0	0%

The positive impacts were largely the same as before, for example, consistency with the approach of the GMC and GDC, and less confusion as it's a simpler process.

Some respondents who thought that this proposal would have a negative impact had concerns about distinguishing between students and fully qualified registrants, but also between optometrists and dispensing opticians, which could have an impact both at an undergraduate education level and for fully qualified registrants working in clinical practice.

Final thoughts and conclusions

Finally, we asked respondents if they had any further comments on any of the proposals. The comments mainly reinforced the feedback previously made:

- how the new system of lifetime registration numbers would allow for different optometry professionals to be identified;
- how long the two systems of 'old' and 'new' numbers would run in tandem for; and
- how the lifetime registration number will impact on information available on the register, for example, if an optometrist is suspended will the register still show this?