



GOC consultation on draft guidance: Maintaining appropriate sexual boundaries and Care of patients in vulnerable circumstances
Consultation questions

What is your name?

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What is your email address?

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Are you responding on behalf of an organisation?

If you answer yes to this question, please ensure that you have consent to respond on behalf of the organisation.

☒ Yes

☐ No

What is the name of the organisation you are responding on behalf of?

FODO – the Association for Eye Care Providers

Which category best describes the organisation you are responding on behalf of?

☐ GOC business registrant

☐ Optical business (but not a GOC business registrant)

☐ CPD provider

☐ Education provider

☐ Patient representative charity/organisation

☒ Optical professional/representative body

☐ Government department

☐ Commissioning body

☐ Other

Guidance on Care of Patients in Vulnerable Circumstances

Q1. How can we make the guidance clearer?

Please provide details

This is clear and helpful guidance which, in our view, strikes the right balance between clarity and detail – making it helpfully accessible. Comments:

Paragraph 6 – should this read “based on their needs **and wishes**” – otherwise it sounds paternalistic?

Paragraph 10 – as this paragraph is addressed to all registrants, “you work” is problematic as it might be interpreted as applying only to individual registrants; we would suggest changing to “**you provide eye care**” instead.

Paragraph 13 - should this read “at risk of abuse and neglect (**including self-neglect**)”?

Paragraph 15 – “patients in domiciliary care” might be interpreted as residential/care homes; should this be “**receiving care in domiciliary settings**”?

Paragraph – it might be helpful also to reference ‘safeguarding guidance’ of which there is much which is relevant to eye care (including sector specific guidance) viz “in line with your workplace policies, **legal requirements and safeguarding and protect guidance**”.

Q2. Is anything missing from the guidance or is there anything else we should consider?

If so, please provide details

No but it may be helpful to mention Protect guidance as in our response to Question 1 above. It can easily be overlooked that being radicalised (including self-radicalisation) is also a vulnerability and a form of exploitation and abuse.

Guidance on Maintaining Appropriate Sexual Boundaries

Q3. How can we make the guidance clearer?

Please provide details

This is clear and helpful guidance and a good draft. Comments:

Paragraph 36 should this read “must not **advance** or hinder”?

Paragraph 40 – first sentence is unclear; it seems to apply to patient confidentiality as in paragraphs 37-39 but then talks about informing the patient if consent cannot be obtained? Is this third party consent?

Paragraph 41 – suggest **behaviour(s)** as in paragraph 42 as experiences can be cumulative and registrants do not need to identify one major event

Paragraph 49 – should this read “who have experienced **or believe they have experienced**” as the shock can be as great even if imagined or mistaken

Paragraph 50 – “now” – better to say “**since October 2024**”?

Q4. Is anything missing from the guidance or is there anything else we should consider?

If so, please provide details

Not in our view.

Welsh language

1. Under the Welsh language standards, we are required to consider what effects, if any (whether positive or adverse), the policy decision would have on opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language, whether those effects are positive or adverse.
2. The guidance on patients in vulnerable circumstances includes examples of reasonable adjustments that registrants can apply to their practice to support patients, which does include support to help patients engage with registrants if English is not their first language. However, the provision of Welsh language services in healthcare in Wales is already required by legislation and therefore would not be affected by this guidance.
3. We have assessed that these proposals will not have any effects on opportunities to use the Welsh language or affect the treatment of the Welsh language and there is more information on our assessment in the impact assessment.

Q5. Will the proposed changes have effects, whether positive or negative, on:

(i) opportunities for persons to use the Welsh language, and

(ii) treating the Welsh language no less favourably than the English language?

- a) Yes re (i)
- b) Yes re (ii)
- c) No re (i)

- d) No re (ii)
- e) Not sure re (i)
- f) Not sure re (ii)

Please provide additional details.

Yes both a) and b). Publishing in the Welsh Language will make the guidance easier to use and discuss for native Welsh speakers and will help promote the use of the Welsh language amongst learners and more widely.

Q6. Could the proposed changes be revised so that they would have positive effects, or increased positive effects, on:

- (i) opportunities for persons to use the Welsh language, and**
- (ii) treating the Welsh language no less favourably than the English language?**

- a) Yes re (i)
- b) Yes re (ii)
- c) No re (i)
- d) No re (ii)
- e) Not sure re (i)
- f) Not sure re (ii)

Please provide additional details.

No.

Q7. Could the proposed changes be revised so that they would not have negative effects, or so that they would have decreased negative effects, on:

- (a) opportunities for persons to use the Welsh language, and**
- (b) treating the Welsh language no less favourably than the English language?**

- a) Yes re (i)
- b) Yes re (ii)
- c) No re (i)
- d) No re (ii)

- e) Not sure re (i)
- f) Not sure re (ii)

Please provide additional details.

No.

Impact assessment

4. We have produced a draft impact assessment which we will update following views received during the consultation.

Q8. Are there any aspects of our proposals that could discriminate against stakeholders with specific characteristics? (Please consider age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, gender identity, gender expression, pregnancy or maternity, caring responsibilities or any other characteristics.)

- a) Yes
- b) No
- c) Not sure

Please provide additional details.

b) No

Q9. Are there any aspects of our proposals that could have a positive impact on stakeholders with specific characteristics? (Please consider age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, gender identity, gender expression, pregnancy or maternity, caring responsibilities or any other characteristics.)

- a) Yes
- b) No
- c) Not sure

Please provide additional details.

- a) Yes – they will encourage the sector always to be mindful of protected characteristics (especially if not immediately obvious) and may encourage people with protected characteristics to be more confident about speaking up about their vulnerabilities and/or reporting unacceptable sexual or

sexualised behaviours. This will be to the ultimate good of patients and the professions.