



GOC - CET exceptions policy consultation

About us

FODO is the leading national association for eye care providers working in primary and community care settings. Each year our members provide over 18 million eye examinations and offer a wide range of other eye care services across the UK.

Our members provide the majority of NHS sight tests in England and offer a wide range of NHS extended primary eye care services. We welcome the opportunity to share our views on the proposed Provider Selection Regime (PSR).

Our response

1.What is your name?

[Sue Silvester](#)

2.What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

healthpolicy@fodo.com

3.Which category best describes you?
(Required)

- ☐ Member of the public
- ☐ Optical patient
- ☐ Optometrist
- ☐ Dispensing optician
- ☐ Student optometrist
- ☐ Student dispensing optician
- ☐ Business registrant/employer
- ☐ Education provider
- ☐ CET provider
- ☒ Professional/representative body
- ☐ Other - please specify

If 'other', please specify.

Click or tap here to enter text.

4.Are you responding on behalf of an organisation?

☒ Yes

☐ No

Name of organisation

FODO – The Association for Eye Care Providers

Questions on proposed updates to the policy

5.To what extent do you agree that the updated policy achieves our aim of appropriately balancing fairness to registrants while maintaining the focus on public protection?

☐ Strongly agree

☐ Agree

☐ Neither agree nor disagree

☒ Disagree

☐ Strongly disagree

If you answered 'disagree' or 'strongly disagree', please explain your reasons.

The policy rightly seeks to address child-raising related reasons for non-completion of CET requirements, but it should equally explicitly mention other caring responsibilities and compassionate leave for serious illness of (and not only death) of a close family member.

Paragraph 4.3 could also helpfully make this clearer by amending "applications involving serious ill health" to applications involving serious ill health of self or close family member".

6.To what extent do you agree that our expectations for registrants on maternity, paternity or adoption leave sufficiently protect the public?

☐ Strongly agree

☐ Agree

☒ Neither agree nor disagree

☐ Disagree

☐ Strongly disagree

If you answered 'disagree' or 'strongly disagree', please explain your reasons.

The 'point a month' rule seems a fair but rather mechanistic approach to public safety. For this reason, even if the registrant has not been able to complete this level of CET, we would

support the proposal from Optometry Scotland that completing a 'return to practice' course instead should be considered an equally effective way of safeguarding the public.

The evidence quoted shows that women on maternity leave clearly have more difficulty than other groups in completing CET. Women are the only group affected physically in this way and harrying them about the detail of numbers of point at a difficult time, however worthy the policy goal, does not seem ethical and may be discriminatory. Far better in our view to support them safely back onto the register through 'return to practice training' at the right time.

7. Is there anything unclear or missing in the updated policy?

- ☒ Yes
- ☐ No
- ☐ Not sure

If you answered 'yes', please give details.

We know that tone is hard to get right but the tone in this policy is forbidding rather than neutral (and hence encouraging of practitioners to come forward). For instance, although implicit, there is no explicit mention in paragraph 4.2 of 'any mitigating factors the registrant may put forward'. 'The reason(s) for not meeting the CET requirements' (4.2.8) and 'any other relevant factors' (4.2.9) do not reassure that the registrant will be listened to fairly. Putting public safety first is not incompatible by being more encouraging of registrants who may feel there is just no point in bothering trying to explain to the GOC, potentially resulting in dedicated clinicians leaving the register.

Similarly, although intended to be helpful, case studies 4 and 5 seem unduly harsh. This is no doubt because they are abbreviated and presented out of context, but they do not give an unequivocal impression to registrants that the rejection decisions were fair. It might be less alarming and more helpful for the GOC to set what the registrant might have done in those circumstances to avoid rejection.

Questions on impacts

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

- ☒ Yes
- ☐ No
- ☐ Not sure

If you answered 'yes', please give details.

As noted above the draft is not sufficiently inclusive of non child-related caring responsibilities or compassionate absences from practice, or sufficiently inclusive in tone, which may deter put some registrants from explaining why their CET was not completed when they have perfectly reasonable explanations of, and solutions to this, which do not put the public at risk. Equally not making exceptional arrangements for pregnant women and new mothers seems unfair, unethical and discriminatory.

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

- ☐ Yes
- ☒ No
- ☐ Not sure

If you answered 'yes', please give details.

Click or tap here to enter text.

10. Are there any other impacts of the updated policy that you would like to tell us about?

- ☒ Yes
- ☐ No
- ☐ Not sure

If you answered 'yes', please give details.

Paragraph 2.1 should read 'This policy sets out' not 'this policy will set out'.

Registrant declaration (Annex) – declaring that the 'contents of the form' are true is odd. Better to declare that 'the information I have given in this application is true'.

Further information

11.Can we publish your response?
(Required)

- ☒ Yes
- ☐ Yes, but please keep my name and my organisation's name private
- ☐ No