



FODO response to General Optical Council (GOC) consultation: ‘Discussion paper on our approach to setting registrant fees’

Q1. Please comment on the ten principles

The principles appear to be sound, with the caveat acknowledged in the consultation document that the principles may sometimes conflict with each other, particularly where certain fee arrangements necessitate costly additional administrative burden.

The tenth principle is that the approach to setting registration fees should be ‘Consistent with the GOC’s financial strategy’. Given the current economic climate, it is important that achieving cost-efficiency is a prominent goal in the GOC’s financial strategy, including avoiding unnecessary initiatives and extra staffing which increases costs and places unrelenting upward pressure on registration fees.

Q2. Which statement below best reflects your general view on differential fees? (Please note we will invite you to comment on each of the five options in the next question.)

A – GOC should retain the current approach of a simple flat fee structure

B – GOC should consider introducing differential fees

We consider that the GOC should retain the current approach of a simple flat fee structure, save for considering a lower registration fee for dispensing opticians.

The GOC should not underestimate the benefits of the current flat fee model which is simple to understand for registrants and resource efficient for the GOC to administer. The widespread implementation of differential fees would increase complexity for all and increase administrative costs, the burden of which will fall on individual and business registrants.

Q3. Please indicate your support for the five options listed below on a 1-10 scale (1 = lowest support, 10 = highest support).

Option 1 – lower fees for dispensing opticians

1 2 3 4 5 6 7 8 9 **10**

We support lower fees for dispensing opticians for the reasons discussed in the consultation document – lower regulatory costs, lower typical earnings and higher early and mid-career attrition.

Our largest members all pay the registration fees of the optometrists and dispensing opticians they employ. We understand that the consequence of lower fees for dispensing opticians would be proportionately higher fees for optometrists and business registrants. We consider this to be fair for the reasons outlined above.

Option 2 – higher fees for registrants with specialist qualifications

1 2 3 4 5 6 7 8 9 10

We do not support higher fees for registrants with specialist qualifications for the following reasons:

- Higher fees would send out the wrong message about the importance of professional development, particularly at a time when the GOC's CPD reforms are in part aimed at supporting the take-up of specialist qualifications.
- Higher fees would disproportionately impact optometry graduates in Scotland completing their pre-registration education and training with independent prescribing.
- As relatively few registrants currently hold specialist qualifications, higher fees would have a modest impact on the level of registration fees of individual and business registrants and would in any event generate little additional revenue for the GOC.

Option 3 – lower fees for newly qualified registrants

1 2 3 **4** 5 6 7 8 9 10

On balance, we do not consider introducing lower fees for newly qualified registrants is necessary. A simple, flat fee structure is easier to administer and keeps administrative costs lower. Our largest members all pay the registration fees of the optometrists and dispensing opticians they employ including those who are newly qualified.

Option 4 – a more generous low-income scheme

1 2 **3** 4 5 6 7 8 9 10

On balance, we do not support a more generous low-income scheme.

We consider that the downsides outlined in the consultation document outweigh the potential benefits. This includes adding uncertainty to the GOC's income projections and additional administrative costs driving higher registration fees for other registrants.

Option 5 – lower fees for registrants on maternity, paternity, parental or adoption leave

1 2 3 4 **5** 6 7 8 9 10

We have adopted a neutral stance on this question.

We can see the value of this suggestion on equality, diversity and inclusion grounds. However, this option would also increase the complexity of the existing simple, flat fee structure and likely increase administrative costs which will be passed on to all registrants in higher fees.

As registration is about the legal ability to practise and this is qualitatively different from, for example, membership of a professional body, many professional regulators do not have similar discounted fees for registrants on these types of leave. Instead, they have mechanisms which would allow someone, should they wish, to leave the register mid registration cycle and then return when they wish to practise again.

The needs of this group of registrants could be effectively addressed by introducing a simple way in which someone could, if they wished, voluntarily remove themselves from the Register and then readmit once they wish to return to work. If someone on maternity, parental or adoption leave nonetheless wished to remain registered, they would need to pay the registration fee and meet their regulatory obligations as for any other registrant.

Q4. Would you like the GOC to allow payment of the annual renewal fee by direct debit instalments?

A – Yes

B – No

C – Don't know/unsure

On balance, we do not support the introduction of direct debit payments for the following reasons:

- Direct debits would increase administrative costs which would have to be passed on to all registrants in higher fees. They would also increase the complexity of the GOC's own financial planning.
- Direct debits would increase the complexity of the registration system for the GOC and for stakeholders, including employers. Subject to amendments to legislation and rules, there would need to be a fair mechanism to remove a registrant for non-payment and notify them and their employer.

Q5. Which of the following options would you prefer?

A – No change – individual and business registrants pay the same fee

B – Business registrants should pay more than individual registrants

C – Individual registrants should pay more than business registrant

We support no change, with individual and business registrants continuing to pay the same fee, for the following reasons:

- As acknowledged in the consultation document, in the absence of legislative reform higher fees for business registrants might lead to some businesses choosing not to register, thereby increasing upward pressure on fees for other registrants. In any event, we strongly consider that no substantial changes should be contemplated to how business registrants are regulated, including fee levels and structures, until a level playing field is created and all businesses delivering protected functions are regulated by the GOC.
- Our largest members pay the registration fees of the dispensing opticians and optometrists they employ and plan to continue to do so. In a tough economic climate, however, our members have had to absorb many inflationary pressures. Higher business registrant fees may act as a disincentive to the current practice continuing over the longer term.
- The discussion paper points to what is a relatively small gap between the proportion of investigations about business registrants (12.4%) and the proportion of businesses on the GOC Register (8.4%). We would note further that it has been some time since a business registrant was referred to a fitness to practise hearing, by far the costliest stage of the fitness to practise process. Business registrants are low risk and the GOC's costs of regulating business registrants are relatively modest.
- Optical businesses are committed to working in a spirit of collaboration and partnership with the GOC and are crucial partners in, for example, supporting

high-quality professional development and ensuring safe and ethical practice. Changes to fee arrangements may be interpreted as penalising businesses and run counter to achieving the GOC's wider strategic aims.

Q6. Which of the following fee models would you prefer?

A – No change – each separately registered business pays the fee

B – Businesses pay different fees linked to their size

We support no change with each separately registered business paying the fee as they do now. The current flat fee model is simple to understand for business registrants and resource efficient for the GOC to administer.

Whilst we understand the challenges of the existing approach as highlighted in the consultation document, we consider that the administrative burden for businesses and for the GOC of linking the registration fee to the size of a business, irrespective of which measure is chosen, would be prohibitive. We would also have concerns about the feasibility of collecting verifiable data which would allow the GOC to charge on a fair and transparent basis a fee which is based on size.

Q7. What should a size-based measurement be based on?

A – Number of stores

B – Bands based on number of employees

C – Bands based on turnover

D – Other

Please see our response to question 6. We strongly disagree with the proposal that a size-based measurement should be introduced.

All of the options put forward in the discussion paper would entail additional administrative burden for the GOC and for business registrants.

Q8. Would you like the GOC to allow businesses to pay the annual renewal fee by direct debit instalments?

A – Yes

B – No

C – Don't know/unsure

Please see our answer to question four about direct debits for individual registrants.

We consider direct debits for business registrants to be unnecessary. It would increase administrative costs and increase the complexity of the registration system.

Q9. Would you like us to consult on costed plans and fees?

A – Yes

B – No

C – Don't know/unsure

The GOC should take sensible, proportionate steps to increase the transparency of its financial planning. This would help support stakeholder understanding and confidence in the GOC's functions.

We support the proposal to consult on a costed draft five year corporate strategy. This would allow stakeholders to influence the GOC's work programme which will influence future budgets. As we said in our response to question one, cost-efficiency must be a key principle on which the GOC plans, funds and delivers its work.

Once the GOC's legislation is reformed, the GOC will also need to set out its fees in statutory rules requiring a public consultation.

Q10. Would you like us to consider introducing multi-year fee cycles?

A – Yes

B – No

C – Don't know/unsure

The discussion paper outlines the downsides of a multi-year approach, including lack of agility in responding to unanticipated changes and the potential for the GOC to raise fees more than required. On that basis, we agree with the GOC that multi-year career cycles should not be considered.

Q11. 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)

Q12. 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)

Q13. Could the proposed changes be revised so that they would not have negative effects, or so that they would have decreased negative 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)