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GENERAL OPTICAL COUNCIL – PERFORMANCE REVIEW

Dear Steve

Thank you for inviting our input to the PSA's annual review of the General Optical Council (GOC), specifically about our experiences with the GOC since 1 October 2020, and why we have been in contact with it over this period.

FODO – The Association for Eye Care Providers – 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 also provide almost all pre-registration training posts for dispensing opticians and optometrists in the UK. As such, and as one of the major defence organisations in eye care, we are a major stakeholder for the GOC.

During the period 1 October 2020 and 1 October 2021, our policy team has worked with the GOC on:

- the GOC's Education Strategic Review (ESR), consequent education standards changes and implementation management, to ensure the UK has a high quality and sustainable eye care workforce both in the short to medium term and for future generations
- the eye care response to Covid-19 – working with all sector bodies to ensure frontline healthcare teams had the support and guidance they needed to meet patient needs throughout the pandemic and to manage the cohort of graduates in vocational training to ensure they could gain the necessary training, meet standards and reach the register.

Our regulatory defence team has been in contact with the GOC to:

- support members through our legal defence cover on fitness to practise matters and has participated in GOC Defence Stakeholder Group quarterly meetings.

We have also responded to GOC consultations on a wide range of issues since October 2020.

We have found having a sector specific regulator invaluable during the pandemic. The GOC supported the sector in responding to Covid-19 with deep understanding of how eye care operates and with clear and timely guidance on meeting patient and population needs whilst keeping staff safe. This helped minimise harm for patients both from Covid-19 but also by reducing the cases of avoidable sight loss due to delays in care.

Given the nature of the pandemic however, and rapidly changing nature of College of Optometrists, NHS, public health and government guidance, there were some communication challenges. This did result in some registrants complaining about GOC communications to the PSA but – rightly in our view – the PSA did not take further action. The GOC also showed a culture of openness, insight and learning, i.e. continuous quality improvement, during this period, acknowledging it had not got all its communications right and making the greatest of efforts to improve this through subsequent stages of the pandemic.

With the ESR, the GOC has addressed concerns we raised with the PSA in our 2018 feedback. We have seen a much more open and collaborative approach. There are now a wide range of stakeholders involved, all bringing skills and expertise to the ESR programme. This will help ensure education and training for dispensing opticians and optometrists is fit for the future.

There have also been significant improvements in how fitness to practise (FTP) matters are managed. As the PSA will know from our 2018 feedback, we felt that outcomes of the GOC's FtP process were invariably honest, fair and appropriate, but there were significant delays in progressing cases. The GOC's triage process has started to help tackle this legacy issue whilst maintaining standards. This is to be commended.

In 2018 we raised some concerns about the GOC's consultation processes, including how more could be done pre consultation to minimise the level of feedback stakeholders would need to give via the formal consultation process. We have seen improvements here, with the GOC now only going to formal consultation after working more on its proposals with stakeholders in advance. The only suggestion we would make is for the GOC to look at the volume of its consultations in the context of wider sector pressures, so that stakeholders have the time and capacity to respond. This has been particularly challenging this year owing to Covid and other priorities but, invariably, when extra time has had to be requested for good reason, it has been granted with good grace as, understanding the sector well, the GOC understands both the pressures and risks.

In conclusion, we have been pleased to see significant improvements since our last submission to the PSA in large part owing to better leadership and necessary changes in senior personnel. We would wish to see the GOC continue to flourish in this way as the scope of practice of both optometrists and dispensing opticians develops significantly over the next few years in response to growing ophthalmic public health needs, changing models of care and new technologies. The GOC has a key role in supporting transformation whilst safeguarding patients, continuing to deliver its strategic goals and maintaining public confidence in the primary eye care sector.

Yours sincerely

Alan Tinger
Director of Regulatory Affairs

