

Invitation to tender (ITT):

Commercial practices and patient safety in the primary eye care sector Summary

- 1. We are looking to commission qualitative research to understand the nature and extent of commercial practices in the eye care sector and any impact this has on patient safety.
- 2. We would like to hear views of General Optical Council (GOC) registrants (optometrists and dispensing opticians), non-GOC regulated eye care staff (for example, optical assistants), optical businesses (both GOC registered and non-GOC registered), and patient representative groups.
- 3. The research will involve designing and conducting the research, then analysing and reporting on the findings.
- 4. The aim of the research is to help us better understand:
 - the nature and extent of commercial practices in the eye care sector;
 - any detrimental impact on patients and the public;
 - any detrimental impact on individual registrants (i.e. optometrists and dispensing opticians);
 - the views of businesses, for example, the balance between providing safe patient care whilst operating in a commercial environment; and
 - what actions the GOC and the wider eye care sector could take to help mitigate against any detrimental impacts on patients and the public and registrants.
- 5. We have an approved budget of up to a total cost of £40,000 including VAT and all other contractor costs. Proposals over £40,000 will not be considered.
- 6. The deadline for tenders is 5pm 27 November 2025.

About the GOC

- 7. We are the regulator for the optical professions in the UK and our mission is to protect the public by upholding high standards in eye care services. We currently register around 35,000 optometrists, dispensing opticians, student optometrists, student dispensing opticians and optical businesses. For more information, please visit our website: https://www.optical.org/
- 8. Optometrists examine eyes, test sight, and prescribe spectacles or contact lenses for those who need them. They are also qualified to fit spectacles and

- contact lenses, give advice on visual problems and detect any ocular disease or abnormality, referring the patient to a medical practitioner if necessary. A fully qualified optometrist can also gain specialty qualifications in independent prescribing.
- A dispensing optician advises on, fits and supplies spectacles after taking account of each patient's visual, vocational and lifestyle needs. A fully qualified dispensing optician can undertake additional specialist training to fit and supply contact lenses.
- 10. The legislation around GOC business registration is complex and does not currently provide for a clear and consistent system. This means in practice we currently only register around half of all optical businesses (nearly 3,000). We are not able to register sole traders or partnerships. We can only register bodies corporate who fulfill certain eligibility requirements.

Research issue and aims

- 11. We are carrying out a <u>thematic review</u> on commercial practices and patient safety in the primary eye care sector. As part of this review, we want to undertake qualitative research to help us understand the views and perspectives of different stakeholder groups.
- 12. The commercial nature of eye care services is an inherent feature of the sector. When it operates well, this brings several benefits for patients including by spurring innovation that widens access to services and improves the quality of care. GOC surveys show high levels of public trust in the profession and that most patients are satisfied with the eye care services they receive and get good value for money.
- 13. However, through our surveys and wider engagement, many registrants have indicated concern about the influence of some commercial practices on their ability to deliver safe patient care. These concerns include the risk of missing diagnosis of eye health conditions due to short sight testing times and clinics being overbooked. Other concerns relate to targets and financial incentives to sell products and services that patients do not need, or which are not in their best interests. Where these factors contribute to registrants feeling unsafe at work due to stress and behaviours like bullying, this can make it more difficult for them to provide safe and effective care.
- 14. Another set of concerns relate to barriers to accessing eye care services, especially for people in vulnerable circumstances. GOC research highlights the role of cost as a barrier to accessing eye care services, including the cost of the sight test, the cost of eyewear and fear of pressure selling. Contributory factors include a lack of price transparency and patients not being told about eligibility for NHS financial support. There is anecdotal evidence of some businesses refusing to treat young children, including because the costs of serving this group are too high.

- 15. From our research and engagement with stakeholders to date, the issues below have been identified, and we would like to explore these further as part of this research project (to note, other issues may also emerge as part of this research that we would also like captured). We would only be looking at these issues in relation to primary eye care services i.e. not eye care services delivered in secondary eye care settings such as hospitals.
 - Overbooking/ghost clinics: An optical business might overbook or run a "ghost clinic" (these take different forms, but are typically where a business double books patients in a clinic, to mitigate against lost appointments due to patients that don't attend, which may result in rushed or reduced sight test appointment times).
 - **Short sight testing times**: Short testing times could be linked to overbooking or ghost clinics, or simply pressure on optometrists to conduct sight tests and see patients more quickly.
 - Commercial targets and incentives: Optometrists and dispensing opticians might be under pressure to meet commercial targets and incentives such as selling products and services (e.g. glasses) that are more financially beneficial to the business or that the patient may not clinically require.
 - Lack of transparency around costs and financial support: There might be a lack of transparency from the optical business around costs and eligibility for NHS financial support for patients such as NHS optical vouchers (for glasses or contact lenses) or free sight tests.
- 16. In short, we would like the research to help us better understand:
 - the nature and extent of commercial practices in the eye care sector;
 - understand what, if any, detrimental impact there is on patients and the public;
 - understand what, if any, detrimental impact there is on individual registrants;
 and
 - identify actions for the GOC and the wider eye care sector.

Methodology

- 17. We would like to carry out qualitative research with stakeholders in order to build upon the quantitative data we already have from our surveys with registrants, patients and members of the public. It is important that we delve deeper and hear the views of stakeholders first hand to give us a better understanding of the issues. We will finalise the research methodology with the appointed agency.
- 18. We envisage focusing the research more on individual GOC registrants and businesses, and slightly less on the other non-regulated eye care staff group as

they may have less experience of some commercial practices such as ghost clinics, short testing times and refusal to treat children. We also do not register this group. We would like one focus group with patient organisations and we can provide the contact details for this.

- Individual GOC registrants (mix of optometrists and dispensing opticians
 working in independents, partnerships and multiples). We can assist in
 raising awareness via GOC channels (such as social media and our
 ebulletin), and can provide contact details for the professional and
 representative bodies who may be able to help with recruitment (for example,
 via newsletters or social media posts). However, we would also like to hear
 from agencies submitting bids how they could boost recruitment if necessary.
- Optical businesses (both GOC registrants and non-registrants with a mix of independents and multiples). We can assist in raising awareness via GOC channels (such as social media and our ebulletin), and we can assist in providing contact details for the professional and representative bodies who may be able to help with recruitment (for example via newsletters or social media posts). However, we would also like to hear from agencies submitting bids, how they could boost recruitment if necessary.
- Other non-regulated eye care staff (e.g. optical assistants and reception staff working in independents, partnerships and multiples). We would like agencies submitting bids to outline how they will recruit for this group.
- Organisations representing patients. We have contact details for this group that we can provide to the successful agency.
- 19. For the individual GOC registrant group (i.e. optometrists and dispensing opticians) and the non-registrant business employee group (i.e. optical assistants), we would like the sample to be diverse in terms of age, gender, socio-economic background and ethnicity.
- 20. The GOC is a UK-wide regulator, and it is important that the sample also includes all four nations of the UK.

Outputs

- 21. The appointed agency will be expected to deliver the following:
 - design questions based on the research aims;
 - data collection;
 - data processing:
 - rigorous analysis of findings and drawing conclusions for the GOC;
 - production of a detailed written report (template to be agreed in advance with the GOC and include infographics) to publishable standards; and

 delivery of all background and foreground data to the GOC on fulfilment of the contract.

Budget

22. We have an approved budget of up to a total cost of £40,000 including VAT and all other contractor costs. Proposals over £40,000 will not be considered.

Timetable

23. The proposed timetable for this project is outlined below. We welcome comments as to whether this is a realistic timetable. (We reserve the right to alter this timetable.)

Task	Date
ITT issued by GOC	3 November 2025
Deadline for queries by agencies	5pm 14 November 2025
Bid submitted by agency	5pm, 27 November 2025
Appointment of agency	w/c 1 December 2025
Draft report submitted by agency	11 March 2026
Final report submitted by agency	1 April 2026

Proposals

- 24. Proposals should clearly state how you would meet the requirements set out in this ITT. They should include:
 - evidence of an understanding of our requirements;
 - details of the project team, relevant skills and experience (including examples of relevant projects previously conducted) and specific project roles;
 - details of any conflicts of interest that the agency or project team members may have relevant to this work and how these would be managed;
 - details of any information or assistance that will be required from the GOC;
 - details of how this project will be delivered, including the project management procedures and a research timetable for the different stages;
 - an assessment of the key risks and how these will be mitigated;
 - a comprehensive itemised cost for all aspects of the work and total cost;
 and
 - a breakdown of different elements of the research and costs to help us prioritise which methodologies to focus on.
 - Details of your sustainable research policies and practices.

Selection process

- 25. Tenders will be assessed with reference to the following criteria:
 - extent to which proposals demonstrate understanding of the brief, and meet its stated objectives in terms of research design (50%);
 - the tenderer having appropriate skills, qualifications and a track record in delivering similar projects (25%); and
 - the ability of the tenderer to deliver this project within the specified timescale and at reasonable costs (25%).
- 26. All work should comply with the Code of Conduct of the Market Research Society.
- 27. The Council reserves the right to pay only for work it deems to be satisfactorily completed.
- 28. The Council is not bound to accept the lowest offer or any tender.
- 29. Following assessment of proposals, we reserve the right to request of selected potential contractors a further tender, proposals or pricing details.

GOC contacts

30. Please send tenders and direct any questions to Angharad Jones (Policy Manager) by email to: ajones@optical.org

Data and freedom of information

31. The Freedom of Information Act 2000 ("FOIA") applies to the GOC and potential contractors should be aware of our obligations and responsibilities under FOIA to disclose, on written request, recorded information held by the GOC. Information provided by you in connection with this proposal, or with any contract that may be awarded as a result of this exercise, may therefore have to be disclosed in response to such a FOIA request, unless we decide that one of the statutory exemptions under the FOIA applies. If you wish to designate information supplied as part of this response as confidential, or if you believe that its disclosure would be prejudicial to any person's commercial interests, you must provide clear and specific detail as to the precise information involved. Such designation alone may not prevent disclosure if in our reasonable opinion publication is required by applicable legislation or Government policy or where disclosure is required by the Information Commissioner.

Warnings/disclaimer

32. Offering an inducement of any kind in relation to obtaining this contract with the GOC will disqualify your proposal from being considered. You must not tell anyone else what your proposal or tender price is or will be, before the deadline for proposals. You must not try to obtain any information about anyone else's proposal or make any arrangements with another organisation about whether

- or not they should make a proposal, or about their or your tender price. Failure to comply with any of these conditions may disqualify your proposal.
- 33. Nothing contained in this ITT or any other communication made between the GOC or our representatives and any person shall constitute an agreement, contract or representation (except for the formal written contract between the GOC and our preferred supplier). Receipt by the tenderer of this ITT does not imply the existence of a contract or commitment by or with the GOC for any purpose and tenderers should note that this ITT may not result in the award of any business.
- 34. It is the responsibility of tenderers to obtain for themselves all information necessary for the preparation of their response to this ITT. The information contained in this ITT and the supporting documents and in any related written or oral communication is believed to be correct at the time of publication. The GOC will not accept any liability for its accuracy, adequacy or completeness and no warranty is given as such. We reserve the right to change any aspect of, or cease, the tender process at any time.
- 35. By issuing this ITT the GOC is not bound in any way and does not have to accept the lowest or any tender.
- 36. You will not be entitled to claim from us any costs or expenses which you may incur in preparing your tender whether or not your tender is successful and regardless of whether a contract is awarded.
- 37. In submitting its tender, the tenderer warrants, represents and undertakes to the GOC that:
 - all information, representations and other matters of fact communicated (whether in writing or otherwise) to the GOC by the tenderer, its staff or agents in connection with or arising out of the tender are true, complete and accurate in all respects, both as at the date communicated and as at the date of tender submission;
 - it has full power and authority to enter into the contract and perform the obligations specified in the contract documents;
 - it is of sound financial standing and has and will have sufficient working capital, skilled staff, equipment and other resources available to it to perform the obligations specified in the contract;
 - it will not at any time during the term or at any time thereafter claim or seek
 to enforce for the purposes of this contract any lien, charge, or other
 encumbrance over property of whatever nature owned or controlled by the
 GOC and which is for the time being in the possession of the tenderer; and
 - it shall have in place sufficient policy or policies that demonstrate a commitment to equal pay and <u>real living wage</u>.