

Response ID ANON-PZ3Y-HPP1-F

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-10-23 18:51:42

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:

ACLM

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

Other

If other, please specify:

Trade Association

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Disagree

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

1. Verification statement

- a. The overwhelming and detailed responses to the GOC's earlier consultation say not to do so (para 185 – 74%). The real problem is that online-only suppliers, including those based in the UK, ignore the regulations and the GOC then does not enforce them. It is noteworthy that the FTC still requires verification before supply in USA: <https://www.ftc.gov/business-guidance/resources/contact-lens-rule-guide-prescribers-sellers>
- b. The wording and likely effect of the proposed changes to verification would reduce the protection afforded to the public
- c. It is acknowledged that overseas-based online-only suppliers are currently beyond UK law

2. Aftercare statement

- a. Almost two-thirds of respondents (65%) to the GOC's earlier consultation response (para 198) thought the Act should specify a definition of aftercare
- b. Those who purchase online are less likely to attend eye examinations and more likely to forget aftercare advice (GOC's earlier consultation response para 215)
- c. An aftercare definition would make it clear what online sellers of contact lenses are obliged to do in order to meet their legal obligations (GOC's earlier consultation response para 205). It should be worded to prevent suppliers just saying 'refer to your high street practice' for aftercare
- d. The evidence for needing a definition is widespread. For example, see a practitioner's description of the issues faced in daily practice (GOC's earlier consultation response para 196)
- f. The sector has been discussing the need for an aftercare definition for some years, so it is clearly an issue which needs to be resolved. A statement, readily available to all, should be seen as supportive of best practice and the protection of contact lens wearers. Crafting a suitable definition of aftercare seems far preferable to leaving the whole matter to chance

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

1. Verification statement

- a. There is no mention of zero-powered contact lenses which are already within the scope of the EU's Medical Device Regulation (MDR) and fully expected to be included in the UK MDR

b. There is no mention of a specification issued when under supervision (only under general direction is described). Supervision only requires the practitioner to be in the building while supply takes place. That is not the same as having a contact lens specification which is issued by a fitting practitioner

2. Aftercare statement

a. There is no mention of aftercare when contact lenses are sold under supervision

b. In the 'instructions and information' bullet point add hygiene, care and wearing time. Eg Instructions and information on the hygiene, cleaning, care and storing of the contact lenses, and in particular the recommended wearing time

c. There is no mention of the do's and don'ts of contact lens wear. These should be available to all in a standard consistent form across all optical bodies and all official sources of contact lens advice. The best option would be to have the standard information on the reverse of all contact lens specification forms – another reason to retain verification and maintain the status and importance of the contact lens specification. The ideal open source advice is at https://www.bcla.org.uk/Public/Consumer/Important_dos_and_dont_s_of_contact_lens_wear.aspx

d. In the 'signs or symptoms' bullet point should be added 'and what steps to take in these circumstances'. It is mentioned in the brief but not the draft statement itself

e. There is no mention of aftercare with substituted contact lenses. Provision for this is within the (password protected) College and ABDO guidelines for practitioners but the patient will be unaware of these until it is too late

f. In the 'importance of having regular ...checkups' bullet point there are two omissions:

i. 'regular' is too vague a term

ii. Reference to the review date on the contact lens specification should be included

g. As described in the AOP's recent Safe Practice series, contact lens aftercare falls within the legal definition of 'contact lens fitting' so practitioners should check that patients are not overdue for their sight test when carrying out contact lens aftercare

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

1. Verification statement

a. What does 'expect sellers to verify' in para 4 mean? If the specification is not forthcoming how can it be verified?

b. The term 'replicate' in the specification requirements of the Opticians Act has a clear definition in the English Dictionary but not, apparently, in Law. If the Opticians Act itself is not to be updated then a proper clarification should be added to other suggested amendments to the 2006 statement on the sale and supply of optical appliances (see Question 11)

e. The verification statement, and other relevant issues, should be displayed on the GOC's website in an easily identifiable section for members of the public. Currently, the regulations governing contact lens supply are convoluted, refer to other documents not easily viewed (including some which are password-protected), and will be difficult for even a determined search by a patient or lay-person to comprehend the nuances

2. Aftercare statement

a. The wording of the aftercare statements should be in clear and in a form easily read and understood by members of the public

b. A statement should include warning patients of the multiple risks of buying contact lenses from unregulated sources

c. The aftercare statement, and other relevant issues, should be displayed on the GOC's website and at a clearly identifiable section for members of the public

8 Are there any aspects of the draft verification and aftercare statement 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.)

Yes

If you answered 'yes', please give details.:

1. Verification statement – the draft verification and aftercare statements are the latest in a long line of 'bolt-on' elements to a creaking set of rules and regulations for contact lens wear. In particular, they are scattered over a range of websites, including with some elements accessible only to members of the various optical associations, so have become impossible for a member of the public to read and properly understand before undertaking the journey. No wonder then that the GOC's own stakeholder perceptions research carried out in 2022 points to 'Limited input from patients and the public'

2. Aftercare statement – as described in answer to earlier questions

9 Are there any aspects of the draft verification and aftercare statement 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.)

Yes

If you answered 'yes', please give details.:

1. Verification statement - none

2. Aftercare statement

- a. Defining aftercare will remind the patient about the various important disciplines needed
- b. Online suppliers should be required to describe aftercare during the online sales process, and in a consistent way. It should be worded to prevent suppliers just saying 'refer to your high street practice' for aftercare

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Yes

If you answered 'yes', please give details.:

1. Verification statement

- a. Without wishing to inhibit the flexibility for patients to purchase contact lenses online using a current specification, it is very likely that the GOC's proposals will still further weaken the link between practitioners and contact lens wearers
- b. It is long-established common knowledge that a significant percentage of contact lens wearers drop out in the very early stages of wear and that ill-fitting substituted contact lenses frequently appear in practice – so much so that practitioner guidelines explain what to do in such circumstances. Furthermore, a 2021 expert testimony and analysis has documented the failings of substituted contact lenses:
<https://www.sciencedirect.com/science/article/pii/S1367048421001508>
- c. The GOC's public perception survey of 2023 asked no questions about patient satisfaction (or otherwise) with online purchase of contact lenses (a growing trend) and no questions about substitution. These are well-established issues and ignoring them is regrettable
- d. While online supply under general direction gives welcomed flexibility to practitioners, it is regrettable that it is not policeable in practice and does nothing to enhance the protection of the public, most particularly from the growing online-only sector

2. Aftercare statement

As listed in answer to Question 7 above, the whole issue of substitution and the inability to enforce replication raises serious concerns for any definition of aftercare. The subject is well-covered in the AOP's Safe Practice guidelines, and indeed in the College and ABDO Guidelines. Unbridled substitution without consequence by online-only suppliers weakens the GOC's ability to protect the public. As stated in AOP guidelines on safe practice:

- a. Any decision to substitute should have actual clinical input. Neither supervision nor general direction adequately cover this matter
- b. A clear record should be kept of which clinician took the decision to substitute lenses, and the reason for the decision
- c. The decision to substitute should always be made in the best interests of the patient (ie not for commercial reasons)

A patient coming in for a check-up wearing lenses from another supplier puts the practitioner in a difficult position. The regulations should support a duty of care to registrants in order to minimise the number of such occurrences.

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Yes

If you answered 'yes', please give details.:

1. Verification statement

- a. The 2006 statement included provision for plano (zero powered) contact lenses as a simpler alternative to re-defining the Optician Act at that time. The principle has therefore been established so the statement should be retained and amended in line with the other suggestions made in this consultation
- b. Plano lenses are now included in the EU's MDR and are expected to be included in the forthcoming UK MDR. They are also included in the College and ABDO Guidelines and in the AOP's recent Safe Practice series guidance to practitioners (none of which are accessible to patients and lay persons). The latest plano lens provisions should be added to an updated 2006 statement
- c. The full definitions of supervision and general direction are not reasonably accessible to patients or online-only sellers. The 2006 statement even admits that the definition of supervision 'has been an area of some confusion'. They are unlikely to be able to download and read the GOC's Standards of Practice for Optometrists and Dispensing Opticians and so will remain ignorant of the different nuances and implications for their well-being. This lack of clarity should be addressed
- d. The 2006 statement should include a legally watertight definition of the word 'replicate' in support of the intention originally expressed in the Opticians Act – in other words, 'To make a replica of; to duplicate, copy exactly'
- e. The 2006 statement should remain accessible to patients and lay persons (such as online-only sellers). These categories are not mentioned in the revised statements on verification and definition of aftercare, but they should be - so they realise that the instructions apply just as much to them as to regulated practitioners
- f. The (amended) 2006 statement on the sale and supply of optical appliances should remain in place and be updated as indicated earlier in this response

2. Aftercare statement – not mentioned in the 2006 statement

Consent to publish your response

12 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Response ID ANON-PZ3Y-HPP2-G

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-10-24 16:44:52

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:

Federation of Optometrists and Dispensing Opticians (FODO)

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

Optical professional/representative body

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

Verification statement

We agree that suppliers should not have to verify a copy of an in-date contact lens specification which is correctly completed and has not been tampered with.

We also agree that where a patient does not have a copy of the contact lens specification that meets these conditions, the supplier should continue to verify the details are correct in accordance with section 27(3)(iii) of the Opticians Act 1989.

Aftercare statement

We support the GOC making a more up-to-date statement about aftercare. However, as this is a statement for the profession, the GOC should be clearer that this is about resupply, not fitting and specification. This comes a little lost and late in Paragraph 9 and so perhaps should be set out at head of the section before Paragraph 6.

Paragraph 6 is also a little misleading in that S27(3B) applies to direct resupply by optometrists, DOs and OMPs, as well as supply under general direction, and also supply of plano lenses. This should perhaps be made clearer.

As this statement is primarily about resupply/continuing supply of powered lenses, it makes sense for providers to remind all powered lens wearers about the basics they will have been taught during the fitting and specification process and also, on first fit/resupply of plano lenses, to highlight the safety basics of safe wear.

However, the proposed content of the new statement is so close to the information and advice we would expect patients to be given during a powered lens fit and specification, that we consider it would be misleading to specify this level of information at resupply and could mislead patients into thinking they had been refitted.

We therefore suggest that to avoid confusion whilst maintaining patient safety, the five bullets be simplified as below and also the section make clear that these are the minimum requirements:

7. The Act does not set out a definition of eye care. However, we would expect all aftercare to include as a minimum:

- reminders about safe contact wear and storage

- reminders about signs or symptoms the patient should look out for and what steps to take in these circumstances or in an emergency
- reminders about the importance of having regular contact lens check-ups as recommended by your optometrist or contact lens optician once your fitting is complete and, at the latest, by the expiry of your contact lens specification or spectacle prescription.

Many providers rightly go far further in terms of the aftercare they offer to their patients, and we would wish them both to continue to do that and also for the public to continue to have high expectations, so perhaps this could be reflected by adding an addition to the statement along the following lines:

Many providers will offer their customers a fuller aftercare service than this and this is one of the factors patients should take into account when choosing where to purchase their ongoing supply of contact lenses.

We have suggested the term 'customers' here as this is how many people see themselves when purchasing further supplies of contact lenses and when not being refitted by an eye care practitioner.

To be clear about plano supply, we would also further suggest adding:

We further expect customers purchasing plano lenses to be provided with instructions and information on the care, wearing, treatment, cleaning and maintenance of the lenses just as if they had had powered lenses fitted. (Opticians Act 1989 (as amended) Section 25).

As this is primarily a statement for the profession, we suggest the GOC also produce a simpler version (legal references in footnotes for example) for its patient-facing communications.

Finally a very minor point but the GOC refers in paragraph 5 to 'our' registrants when perhaps just 'registrants' would be better as providers would expect medical practitioners also working our sector similarly to comply with all requests for verification.

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

Please see our response to question 5.

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

There is a risk of causing some confusion, but this is readily resolved, see our answer to question five.

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Yes

If you answered 'yes', please give details.:

This statement has been helpful to the sector over many years, and we would like to see it retained as a helpful reminder for providers and practitioners.

We would therefore prefer the GOC to:

- amend the sight-corrected (powered) contact lens section to reflect the new statement - include a hyperlink and cross reference to new statement - following the outcome of this consultation
- remove the references to optical bodies' work long completed, and
- replace them with references and links to the standards.

Consent to publish your response

12 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPP8-P

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-10-24 16:57:52

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:
The College of Optometrists

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

Optical professional/representative body

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Disagree

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

1. Verification statement.

The current regulatory regime continues to protect the public, and we see no benefit for the public or clinicians to relax this requirement.

Verification of contact lens specifications is only required if the seller does not have the original specification, and if the seller is under the general direction of a dispensing optician, optometrist, or registered medical practitioner. We believe this continues to be an important patient safety measure as it reduces the risk of patients being supplied with incorrect lenses, as well as ensures that lenses are not supplied beyond the expiry date of the specification.

Verification is an important step in ensuring the correct contact lenses are supplied to a patient. While it means there is an administrative responsibility for both the supplier and the original issuer of the specification, removing verification could result in consumers being supplied contact lenses to an incorrect specification or inappropriate contact lens substitution.

Verification is not necessary:

- By or under the supervision of the patient's contact lens fitter
- Under the general direction of the patient's contact lens fitter (who will have their specification)
- By or under the supervision of an appropriate practitioner
- Under the general direction of an appropriate practitioner who has the patient's original specification

As verification was introduced for the protection of the public, and lenses can be supplied remotely under the circumstances above, we see no reason to relax the verification requirements at this time. There is a paucity of research into the risk of harm of not verifying a contact lens specification, so we cannot say what the impact of such a policy change will be on patient safety. The absence of available evidence does not mean there is absence of risk, which is why we support maintaining the status quo.

A 2015 consumer research from the GOC on contact lens wearers behaviour reinforces the need to make sure patients receive and follow appropriate advice from registrants to ensure they are wearing their lenses safely and protecting their eyes. Removing the verification of contact lens specifications requirement may lead to more contact lens wearers following risky behaviour.

Ref: <https://optical.org/media/sfrcq5og/contact-lens-survey-research-report-2015.pdf>.

Finally, removing the verification of contact lens specifications requirement would bring contact lenses to the same management level as for spectacle prescriptions, while wearing contact lenses have significantly more risk of harm than wearing spectacles.

2. Aftercare statement

We do not think a GOC definition of aftercare is needed. The professional bodies already provide good practice guidance for registrants to ensure safe and effective aftercare examinations and advice, which is long-standing and well-established. Membership bodies and industry also provide advice on the matter.

Sections A399-A401 and A403-A411 of The College of Optometrists Guidance for Professional Practice set out clear guidance on both aftercare and contact lens check-ups. We would recommend these are referred to by the GOC to define aftercare.

Ref:

- <https://www.college-optometrists.org/Clinical-guidance/Guidance/Knowledge,-skills-and-performance/Contact-lens-supply/Aftercare>

- <https://www.college-optometrists.org/Clinical-guidance/Guidance/Knowledge,-skills-and-performance/Contact-lens-check-ups>

Additionally, registrants should be able to utilise their professional judgment to provide care and information that is centred on patient needs, and be able to have sufficient flexibility to customise aftercare based on what is clinically indicated and in a way that is most effective for the individual patient. This falls within the core competency of all registrants. For example, the information provided to a child would be different to that provided to an adult, or there may be more information given for a person affected by dry eye discomfort.

Certain lens modalities such as those for myopia management, management of keratoconus or bandage lenses would typically have additional information and support provided. In our view, providing a regulatory definition of aftercare would lead to a one-size-fits-all approach to aftercare information, which is not in the public interest.

We do not see how a definition of aftercare would improve the level of aftercare currently being offered by registrants.

Additionally, we are concerned that a regulatory definition may result in the following unintended consequences:

- A lower level of registrant-led aftercare information that does not meet patients' individual needs, either clinically or from an accessibility perspective.
- Restrict the ability of innovative communication solutions, e.g. utilisation of apps, videos and gamification, to improve the effectiveness of successful contact lens wear and reduce the risk of complications.
- Create an unequal parity between a one-size-fits-all tick-box aftercare, e.g. from online suppliers, and clinician-led tailored information delivered from optometry/optical practices. In a worse-case scenario, online suppliers could include a short universal note on aftercare with each order to meet such a restricted GOC aftercare definition, giving false reassurance to their customers. This could result in more complications and fewer contact lens check-ups.

As mentioned above, sections A399-A401 and A403-A411 of The College of Optometrists Guidance for Professional Practice sets out guidance on both aftercare and contact lens check-ups that is clear, subject to expert scrutiny and regular consultation. This is reviewed once every three years. We appreciate this consultation is only considering aftercare, not check-ups, however as the two are often conflated, and terms used interchangeably in the UK, our current guidance covers both aftercare and contact lens check-ups.

Ref:

- <https://www.college-optometrists.org/Clinical-guidance/Guidance/Knowledge,-skills-and-performance/Contact-lens-supply/Aftercare>

- <https://www.college-optometrists.org/Clinical-guidance/Guidance/Knowledge,-skills-and-performance/Contact-lens-check-ups>

If the GOC decides to progress with providing a definition of aftercare, it is important that it is amended to include reference to ensuring that the information provided meets the patient's clinical and communication needs.

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

1. Verification statement.

a. There is no mention of zero-powered contact lenses, which are already within the scope of the EU's Medical Device Regulation (MDR) and fully expected to be included in the UK MDR.

2. Aftercare statement.

The following information - as set out in our Guidance for Professional Practice (Sections A350-A357:

<https://www.college-optometrists.org/clinical-guidance/guidance/knowledge,-skills-and-performance/fitting-contact-lenses#Thefittingprocess>) - and that is currently commonly provided by registrants - is missing from this definition:

- a. There needs to be information on contact lens wearing times.
- b. There needs to be a reminder that contact lenses should not come into contact with tap water.
- c. There should be a specific point on hygiene, in particular hand washing, before handling lenses.
- d. There is no mention of the do's and don'ts on contact lens wear and care, similar to what the BCLA has published here: https://www.bcla.org.uk/Public/Consumer/Important_dos_and_dont_s_of_contact_lens_wear.aspx

- e. There is no mention of providing information on what to do in an emergency or out of office hours.
- f. There is no mention of the requirement to continue to have regular sight tests.
- g. There is no requirement to ensure the information is presented in an accessible way.

Furthermore, it should be specified that these requirements are a minimum expectation, as registrants currently go far beyond this. Finally, the information should include the importance of having regular contact lens check-ups as recommended by an optometrist or contact lens optician once the fitting is complete and at the latest by the expiry of a contact lens specification or spectacle prescription.

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

1. Verification statement.

- a. If the GOC withdraws the verification requirement there is a risk that there may be an increase in substitution of inappropriate lenses, and possible harm to patients.
- b. The GOC should ensure there is an effective communications plan in place to ensure any change is well communicated to all relevant stakeholders and the public.

2. Aftercare statement

There is a risk the quality of information provided to patients will fail to meet the required standard, should a definition of aftercare be published by the GOC. More than 4 million people use contact lenses in the UK. These patients have easy access to GOC registrants' practices who provide high-quality aftercare advice, protecting patients' eye health and helping reduce the risks associated with contact lenses and improve comfort and wearing experience.

8 Are there any aspects of the draft verification and aftercare statement 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.)

Yes

If you answered 'yes', please give details.:

Registrants are currently able to utilise their professional judgment to provide care and information that is centred on patient needs, and have sufficient flexibility to customise aftercare based on what is clinically indicated and in a way that is most effective for the individual patient. The risk of a one-size-fits-all aftercare definition is that the needs of certain groups of patients will not be met, e.g. patients with certain disabilities, patients who have limited or no English, and children.

9 Are there any aspects of the draft verification and aftercare statement 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.)

Not sure

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Not sure

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Yes

If you answered 'yes', please give details.:

We are concerned that a regulatory definition of aftercare may result in the following unintended consequences:

- A lower level of registrant-led aftercare information that does not meet patients' individual needs, either clinically or from an accessibility perspective.
- Restriction of the ability to use innovative communication channels, e.g. apps, videos, and gamification, to improve the effectiveness of successful contact lens wear and reduce the risk of complications.
- Creation of an unequal parity between a one-size-fits-all tick-box aftercare, e.g. from online suppliers, and clinician-led tailored information delivered

from optometry/optical practices.

Consent to publish your response

12 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPPH-6

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-10-24 11:43:20

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:
British Contact Lens Association

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

Optical professional/representative body

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Disagree

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

Verification:

The BCLA agree that an in-date signed contact lens specification which is completed and dated should not need verification.

We agree that verification of a contact lens prescription should be undertaken if the patient does not have a copy of their contact lens specification. Verification in this event will help to ensure the patient receives contact lenses of the correct specification.

Interestingly your statement covers prescription contact lenses but not plano coloured contact lenses.

Aftercare:

This should cover both prescription and plano coloured contact lenses.

The BCLA consider a definition for after care is not needed in this instance. Registrants are able to gather guidance from their professional bodies with respect to aftercare. Aftercare of patients wearing contact lenses varies on the type of contact lens worn and varying pathological conditions for which contact lenses may be prescribed.

We also question the use of the word "reasonable" in the draft guidance. Registrants should be allowed to exercise their clinical judgement on a case by case basis.

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

Verification

As mentioned earlier, there is no mention of plano coloured contact lenses.

Aftercare

Aftercare is far more extensive than the definition you provide. Aftercare involves discussion around:

- Reminders of instruction that was given to them by the fitting optometrist / contact lens optician on the inserting, wearing and removing of the contact lenses; avoiding open/tap water/saunas and jacuzzi's
- Reminders on the importance of following the instructions and information given to them by the fitting optometrist/ contact lens optician on the cleaning and storing of the contact lenses;
- signs or symptoms the patient should look out for and what steps to take in these circumstances or in an emergency
- details of whom the patient should contact if they have problems with the contact lenses; and
- the importance of having regular contact lens check-ups as recommended by your optometrist or contact lens optician once your fitting is complete and at the latest by the expiry of your contact lens specification or spectacle prescription.
- Details of when to attend for an eye examination
- Do's and don't's of contact lens wear information

The global consensus of experts in the BCLA CLEAR Evidence -based contact lens practice publication concluded, "Aftercare visits should focus on changes in experience from previous visits, but also review any changes in environment, work/hobbies and health that could impact future lens wear. Lens brand and care system recall is generally poor, but is much enhanced using photo-prompts. At least in the past, the use of fluorescein in aftercare appointments across European countries has been poor with little valid justification. The tear film should be examined as its homeostasis can be affected by many factors including ageing, so may lead to discomfort and the need to review contact lens factors even after a period of successful lens wear. Lid eversion is also required to inspect the palpebral conjunctiva."

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

Removing the need to verify in the event of a patient not having a written contact lens prescription may result in substitution which may put the patient at risk.

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Response ID ANON-PZ3Y-HPPN-C

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-10-24 18:44:06

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:

Association of British Dispensing Opticians (ABDO)

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

Optical professional/representative body

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Disagree

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

Draft verification statement:

ABDO would agree that an in-date contact lens specification signed by an appropriate registrant (including their GOC number and UK practice address) should not require further verification.

Verification should also always be sought if there is any confusion regarding the specification details, concerns with the validity of the specification (or copy specification), or any ambiguity around who has issued the document.

If a patient does not have a specification that meets this requirement, or there are any concerns with the specification (or copy) then the supplier must seek to verify with the issuer as per section 27(3)(iii) of the 1989 Opticians Act.

In the event of the supplier being unable to verify the contact lens specifications then it should not be able to supply contact lenses to the patient.

Verification of contact lens specifications should apply to both prescription and non-prescription (plano) contact lenses.

Aftercare statement:

ABDO does not agree with the aftercare statement.

Both professional bodies (ABDO & College of Optometrists) supply detailed advice and guidance on aftercare which allows registrants to utilize their clinical skills and judgement for the benefit of patients attending for aftercare appointments. Part of this is tailoring the aftercare for the specific patients' needs based on their contact lens history, contact lens type, modality, risk factors etc. A "blanket definition" would not be helpful and may indeed create additional risk factors for patients as aftercare could be reduced to a standardized "tick box exercise" and not take into account the patients' specific circumstances.

ABDO's Advice and Guidance Section C5.2.5.2 and C5.2.5.3 covers our expectations for members and in particular highlights that it should be "Individual aftercare arrangements" that are in place.

ABDO is also of the strong opinion that all suppliers of contact lenses (whether prescription or plano) should ensure defined aftercare arrangements are in place and should not be expecting practitioners or the hospital eyecare service to provide non-routine aftercare.

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

Draft verification statement:
should be inclusive of both prescription and plano contact lenses.

Aftercare statement:

The suggested "aftercare" statement is simply inadequate and the suggestion that "Aftercare in this context should not be confused with assessing the fit of contact lenses, sometimes referred to as a contact lens fitting, check or check-up by optical businesses" is misleading.

An aftercare appointment is recognised as a bespoke appointment led by a clinician. As per our previous comments, this appointment is tailored to the specific needs of the patient including medical history, previous wear, modality, visual performance of the contact lenses, patient's modality, compliance (including wear time and cleaning), an "on the eye" assessment of fit and contact lens condition, eye health in specific relation to contact lens wear (i.e. signs of over wear, dryness, incompatibility with solutions etc), discussion of the "do's and don'ts" and advice on signs and symptoms. We suggest that the GOC should consider a definition more aligned with the following:

"An appointment with an appropriately qualified clinician at intervals determined purely by clinical advice, during which a clinical examination tailored to the individual patient's needs is carried out and appropriate patient safety advice is provided".

The present suggested "definition of aftercare" is disappointingly little more than the equivalent of the patient safety leaflet supplied in a packet of over the counter medication- and is as highly likely to be ignored.

Far better this be renamed "General patient safety advice to be issued by suppliers during an aftercare appointment" and allow further discussion on a suitable definition of "aftercare/check-ups" which recognize the importance of them being clinician led and incorporates our suggestion above.

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

Draft verification statement:

If the requirement is withdrawn without robust drafting of the replacement statement, then we may see suppliers continue and possibly increase substitution.

Aftercare statement:

Please see our response to Q6. ABDO feels the proposed "aftercare statement" is inadequate to protect patients and may lead to aftercare/check-ups etc becoming simply tick-box exercises to the detriment of the patient's eye health.

It will be confusing to patients who may well feel they have received adequate "aftercare" from the contact lens supplier when in fact they have received instead some "high-level advice and guidance".

It would be far better for the GOC to re-visit this statement in light of concerns from across the professional bodies, sector organisations, suppliers, and manufacturer representatives to ensure that patients are protected.

It would seem that in this statement the GOC are seeking to redefine aftercare as a simple "do's and don'ts" for contact lens wearers rather than recognize it is a bespoke clinical appointment vital to the success of a patient's long-term contact lens wear.

8 Are there any aspects of the draft verification and aftercare statement 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.)

Not sure

If you answered 'yes', please give details.:

We are not confident that any member of the public, be it those with special characteristics or not, will be protected adequately by the suggested "aftercare statement".

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Yes

If you answered 'yes', please give details.:

Please see our concerns regarding the "aftercare statement" above.

If this suggested style of definition is introduced, then patients will be ill-served by a move from clinician-led care to a "tick box" exercise.

We are concerned that the basic premise that contact lenses are medical devices seems to have been again overlooked in this consultation and in particular the situation in regard to the provision of and aftercare for, plano lenses.

Consent to publish your response

12 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPPW-N

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-10-19 14:06:28

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:
Association of Optometrists

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

Optical professional/representative body

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

We broadly welcome this consultation particularly given that it directly responds to feedback we expressed as part of the GOC's Call for Evidence (CfE) on the Opticians Act 1989 ('the Act') last year.

It is clearly in the public interest that the core parts of Section 27 of the Act, namely contact lens prescribing and fitting and in-date requirements, will remain unchanged.

However, we feel the proposals could be strengthened with additional safeguards to enhance patient safety as we explain in our answer below.

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

Verification:

We feel that the draft statement on relaxing contact lens verification reflects the technological changes since the Opticians Act 1989, particularly the common use of online and mobile devices in practice settings. We agree with the points regarding the possible burden on the original provider to verify a copy of the specification and the accompanying likelihood of delays and costs to patients.

Where a copy of the specification is provided, in our view a photograph or similar image is acceptable and as per our CfE submission, as long as it hasn't obviously been tampered with, we are content that verification is not required. Where only the particulars of a specification are provided, most likely into an online form, we agree that verification should still be a requirement.

We also support the proposed caveat to the proposal that:

- The specification or copy of the specification must be clear, does not contain any obvious errors and has not been tampered with.

However, where this is the case, in these situations we would like to see the verification statement clarify the requirement to contact the original

prescriber. As it stands, it is not clear what the course of action should be in the event of a tampered/erred etc specification. Original suppliers can either provide a copy of the original specification to the patient or gain the patient's permission to send a copy directly to the supplier.

We note the requirement (5) 'We continue to expect our registrants to co-operate with all requests for verification.' However, we also feel the proposals as they stand require greater emphasis on the importance of online suppliers in particular meeting this expectation. As we said in our response to last year's CfE response on proposals to amend the Opticians Act, it is essential that contact lens suppliers ensure that lenses meet the specification.

Contact lens wear carries various risks of infection and corneal damage (Wolffsohn, J. S., Dumbleton, K., Huntjens, B., Kandel, H., Koh, S., Kunnen, C. M., ... & Stapleton, F. (2021). BCLA CLEAR-Evidence-based contact lens practice. *Contact Lens and Anterior Eye*, 44(2), 368-397). There are several risks of harm to patients from being supplied with lenses that do not match their specification which can result from a failure to verify contact lens particulars or inappropriate contact lens substitution. These include risks of corneal damage, eye infection, eye discomfort, and poorer visual acuity particularly a risk of failing to meet vision standards for driving.

Our concern is that online suppliers of contact lenses, unlike optical practice suppliers, are not in a position to monitor such patient risks. Therefore, it is important that the verification statement emphasises the particular importance of online suppliers ensuring that specifications are suitable as per the GOC's proposed verification statement prior to sale.

Aftercare:

In our CfE response last year we called for a specific definition of aftercare as mandated by the Act. Therefore, we are pleased that the GOC has accepted the importance of this by consulting on a proposed statement.

We note the GOC's proposed aftercare definition includes:

- instructions and information on the inserting, wearing and removing of the contact lenses;
- instructions and information on the cleaning and storing of the contact lenses;
- signs or symptoms the patient should look out for;
- details of who the patient should contact if they have problems with the contact lenses; and
- the importance of having regular contact lens check-ups.

These are all appropriate but we ask that the first point be expanded with a focus on hygiene and care as well as insertion, wearing and removing.

In our view the second point 'instructions and information on the cleaning and storing of the contacts lenses' is not sufficiently comprehensive. Without appropriate advice about how to care for, clean, and store their lenses, there is a significant risk that patients develop unsafe contact lens habits. This may increase the risk of developing sight loss-causing infections (Stapleton, F., Keay, L., Jalbert, I., & Cole, N. (2007). The epidemiology of contact lens related infiltrates. *Optometry and vision science*, 84(4), 257-272). Specifically, acanthamoeba keratitis is a rare but severe corneal infection that affects mainly contact lens wearers in Western countries (Carnt, N., & Stapleton, F. (2016). Strategies for the prevention of contact lens-related Acanthamoeba keratitis: a review. *Ophthalmic and physiological optics*, 36(2), 77-92). It can lead to visual impairment and blindness, and it can develop as a result of poor contact lens hygiene and exposure to tap water. This is why regulations that ensure the patient has had a recent contact lens fitting with instruction on hygiene and care and provision of aftercare are essential.

Therefore, it is important that sellers explain the need for correct lens care particularly with regard to exposure to tap water. This is even more important when we consider that whereas in the past patients would habitually purchase their lenses from the initial lens fitter, this is no longer the case.

Conclusion: our view remains that the severity of the risks of poor contact lens care means patient safety is best served by purchasing their lenses from an appropriately qualified registered professional following a fitting by a similar professional. We also argue that if lens substitution is indicated, patient safety is best served by this also being overseen and authorised by such a professional.

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

The main unintended consequence that may arise from the proposed statement is that it could be read as allowing too much scope for online suppliers who will not be in a position to perform the clinical oversight of optical practice professionals.

In terms of risks that cannot be mitigated against, the prime risk is non-UK supply of lenses. We recognise that such suppliers are by definition outside of the regulatory powers granted to the GOC by the Act. However, the GOC should work with the UK professional bodies and workforce to help educate the public about the significant risks from unsuitable lens purchases from non-UK regulated suppliers.

This is why we call for an enhanced statement to make specific reference to the duties of online suppliers where the GOC can exercise its authority.

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

Please see our responses to Questions 7 and 8.

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Response ID BHLF-PZ3Y-HPPE-3

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-10-26 09:21:12

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:
Daysoft Limited

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

Other

If other, please specify:
Contact lens manufacturer

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Not Answered

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

Identical objectives. The GOC's stated objective, as a Regulator, is to maintain patient and public safety. Daysoft's objective as a UK contact lens technology innovator and manufacturer is identical. However, the methods for achieving this differ fundamentally. The GOC's proposal majors on 'prescription/specification verification' which by definition curtails 'brand-substitution'. This brand substitution curtailment stifles patient transition from higher risk Overnight (ON) or Reusable (RU) contact lens modality wear to lowest risk Daily Disposable (DD) modality wear, and within existing DD wearing patients, constrains their access to lowest-cost DD brands.

There is no evidence that this approach described by the GOC will protect patient or public safety. The condition which must constantly be addressed is the infection to the cornea and this requires more fundamental considerations as I will now explain:

The key is to reduce microbial load. To maintain 'patient and public safety' requires the reduction or elimination of the causes of microbial load to the cornea to reduce the risks of infections such as bacterial keratitis which can lead to varying levels of vision loss. UK contact lens manufacturers are required to comply with Regulations. Manufacturing regulators independently assess production activities to ISO standards to ensure the actual lenses and packing solution are sealed then sterilised with a suitable 'shelf-life' in a way which eliminates microbial load. It is the subsequent on eye experiences of Overnight (ON) or Reusable (RU) types and complex after-care which lead to infection risks. The proposed GOC verification process will not obviate this.

Identifying and eliminating causes of infection. On-eye infections relate primarily to the 'modality' of lens wear prescribed ie ON or RU or Daily-disposable (DD) lens wear. Data recorded from a wide range of independent studies (ref Note 1) over the past 25 to 30 years has revealed that now, unquestionably, wearing DD contact lenses gives a far lower microbial load than that caused by ON or RU lens wear thereby reducing the risks of the cornea being subjected to bacterial keratitis.

It cannot be overstated that risks, such as they are from wearing contact lenses, are fundamentally related to 'modality' (ie DD or ON or RU) wear. To reduce or even eliminate the microbial load associated with contact lens wear requires the fitting or switching of wearers to DD wear. This also greatly simplifies 'after-care' complexities of ON or RU ... with DD the lens is simply replaced as and when required by a fresh-sterile contact lens. Switching to DD is essential but cost has been a barrier. The switching from ON or RU to DD brands raises problems including higher product costs and therefore lower profit margins (for manufacturers and opticians) or greatly increased prices to wearers. Solving this by price increases for DD lenses simply encourages the continued prescribing by opticians of ON or RU modalities or may result in wearers dropping-out of contact lens wear completely. The proposed repeated 'verification' of the original modality/brand, even if conducted under the general supervision of a GOC registrant or registered medical practitioner, simply locks wearers into the prescribed ON or RU lenses. A 'vicious circle of risk'.

Solving the problem with a 'go to' interchangeable lens design and low-cost delivery. Daysoft started addressing the challenge of cost-effectively switching ON or RU wearers to its DD contact lenses as far back as 2006 by developing a lens which can successfully replace all soft spherical lenses being marketed. Sale and Supply costs were also addressed by a unique of internet/e-commerce-based Business Model operating alongside Daysoft's in-house manufacturing process. I demonstrated this to the GOC Registrar in 2006 at his Harley Street office but it was dismissed. Then again, I wrote the GOC on 9th October 2015 setting out the relative loss of vision risks from keratitis by modalities.

The proof. The resulting wearer data-base now contains details of over 1 billion lens sales (60%+) as replacements for over 200 different competitor-brands being fitted, sold and supplied. The 'success rate' exceeds 95.5% substitution success which is similar or better than that from refitting ostensibly the 'same' brand but made at a different time.

Also, Daysoft's high volume manufacture is sub-divided into discrete small (around just 2,000 lenses) identifiable Lots/Batches with individual traceable Lot Numbers allowing traceability not only within manufacture but to any person receiving the lenses. Wearer details for each person receiving an order are also held by Lot number supplied facilitating an immediate wearer-specific recall, if one were ever considered necessary. None has been. No other contact lens manufacturer known to Daysoft has this valuable capability which facilitates post-marketing patient safety and confirms our successful brand replacement without-refitting claims. Likewise, no other contact lens manufacturer/supplier known to Daysoft has solved the issues allowing the provision to profitable supply to wearers of DD contact lenses from just 20p per lens delivered direct to home/office. Now DD ownership is possible at lower cost of ownership than the higher risks of ON or RU modalities.

Response by the optical profession. The GOC's latest proposal is basically the same as that in place since 1986 with reliance on paper-work or other forms of verification with no incentive to stop prescribing of ON or RU lenses by opticians all of whom are GOC Registrants. This 'keep doing the same thing' simply locks-in known patient risks. Our position is that ON or RU contact lenses carry higher than necessary vision loss risks. Verifying that such lenses are being supplied in each transaction does little to mitigate potential injury. Verifying the supply of a risky lens is simply agreeing the supply of a risky lens. The GOC should recognise today's reality in any proposed changes to legislation.

Daysoft has brought an innovative and safe product to the market, which has benefitted contact lens wearers. Regrettably, in the past, the GOC has acted in a way which has sought to hinder Daysoft's innovations. It is critical that any proposals do not prevent innovation which benefit contact lens wearers.

A proposed meeting. I am willing to meet with appropriate GOC representatives at Daysoft's offices in order to address any reasonable questions about how Daysoft reduces public or patient risks associated with contact lens wear.

NOTE 1: This is based on extracts from the paper presented by Professor John Dart to British Contact Lens Association (BCLA) 28th January 2016 : "Data recorded from a wide range of studies over the past 20 years has revealed that daily disposables (DD) have a far lower microbial load and therefore present a far lesser risk of leading to potential infections such as bacterial keratitis".

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Not Answered

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Not Answered

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

Not Answered

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

Not Answered

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Not Answered

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Not Answered

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPC9-A

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-08 13:59:41

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Neither agree nor disagree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

No

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Not sure

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPCA-J

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-08 15:02:07

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

The supplier should only be able to supply the contact lenses as prescribed and not change material, manufacturer or parameters without a new consultation with the prescribing Optician.

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

No

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPCY-A

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-15 22:00:31

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Optometrist

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Strongly disagree

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

I believe it is going to create a free for all situation especially for online sellers who place profits before public safety.

I have evidence that they have already started advertising to patients encouraging them to purchase from them now that they no longer require a prescription.

6 Is there anything unclear or missing in the draft verification and aftercare statement?

No

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

Online sellers playing loose with the regulations. Loosening the regulations further is absolutely the wrong direction to go if public safety is truly what the GOC is intending to protect.

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Yes

If you answered 'yes', please give details.:

More members of the public being blinded through unregulated sale of a medical appliance.

Consent to publish your response

12 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPKG-Z

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-27 10:56:02

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

No

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

No

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPP4-J

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-10-03 15:37:28

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Other

If other, please specify:

Student Contact Lens Optician

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

No

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

No

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPC3-4

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-08 12:15:14

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Dispensing optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Neither agree nor disagree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

It should be stated boldly that aftercare appointments should be at least annually and that supply of contact lenses cannot be continued if an aftercare appointment is overdue

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Not sure

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Not sure

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Yes

If you answered 'yes', please give details.:

If supply of lenses that have not been supplied by the originator then causes issues for the future supplier

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPC7-8

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-11 12:25:48

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Optometrist

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

Is the validity of the date of the specification required or not required. In other words, can a specification be deemed out of date?

Should the specification be related to the date of aftercare? In other words, if a person is "overdue" for their aftercare, does this mean the specification is out of date?

Additionally, can a specification "expire"? Should it have the date of the required next aftercare written on it?

Does the draft statement place the wearer to self decide when an after are is due, based on a change in comfort or vision?

Does this confusion need clarity?

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

See above re- expiry date of specification based on aftercare date?

8 Are there any aspects of the draft verification and aftercare statement 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.)

Not sure

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

Not sure

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Not Answered

If you answered 'yes', please give details.:

This will depend on how "light touch" the eventual definition of the specification and aftercare are.

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Not sure

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPCB-K

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-12 19:48:33

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

As stated I do think verification is outdated and unnecessary especially in times where low staffing occurs in many workplaces and may hold up providing a service. The aftercare statement I feel should be more thorough and I feel lens suppliers (of the product not just the specification) should have a duty to advise and inform patients of the requirements.

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

As above

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Not sure

If you answered 'yes', please give details.:

Possibly, if a specification doesn't require verification, are you assuming a professional judgement has been made in all cases to be confident that it is genuine...?

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Not sure

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPCC-M

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-09 19:20:19

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Disagree

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

Verification prevents error, protects high street opticians and encourages customers to purchase in Opticians where they will have their aftercare. Evidence shows patients purchasing online take longer to have their routine aftercare and are more likely to have eye infections due to the delay in compliance checks.

6 Is there anything unclear or missing in the draft verification and aftercare statement?

No

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Not sure

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Yes

If you answered 'yes', please give details.:

Decrease in footfall in Opticians, patients less likely to have regular check ups. Opticians will suffer financially.

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Yes

If you answered 'yes', please give details.:

Increase in eye infections due to delayed check ups.

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPCF-Q

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-08-30 12:19:51

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:

[redacted]

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

Optometrist

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

No

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

No

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPCH-S

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-08 15:53:49

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Strongly disagree

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

contact lens wear and supply is not playtime it is fraught with issues of patients non compliance as it is
this is just sweeties in a sweet shop stuff , appalling

6 Is there anything unclear or missing in the draft verification and aftercare statement?

No

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

it should not be changed

8 Are there any aspects of the draft verification and aftercare statement 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.)

Not sure

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Yes

If you answered 'yes', please give details.:

how to do continuous aftercare for a patient

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Yes

If you answered 'yes', please give details.:

patient care will suffer

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPCM-X

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-01 07:02:50

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

No

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Not sure

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPCN-Y

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-08 21:46:54

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

Over a period of time after the fitting of contact lenses a series of progress examinations are required. I feel the statement does not make it clear what the distinction is between a progress examination and regular aftercare examinations. Regular aftercare examinations tend to take place later on a routine, regular basis or when the patient might be experiencing some issues which they feel requires a further examination.

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Not sure

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Yes

If you answered 'yes', please give details.:

The 'unregulated' internet sales of contact lenses. The majority of internet contact lens sales are made with no regard to the details of the Contact Lens Prescription issued by the GOC registered optician. Often the spectacle prescription is used to ascertain the contact lens prescription and there is often unauthorised switching of brands and by the internet sellers. Quite frankly there is little regard to applying GOC guidance to these sales. These are not rare occurrences.

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPK4-D

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-18 15:53:04

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Neither agree nor disagree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

The supplier should assume responsibility for the purchase on the patients eye IF they supply an 'equivalent' product that is not the SAME

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

You are loosening regulation during times of increased litigation.

8 Are there any aspects of the draft verification and aftercare statement 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.)

Not sure

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

Not sure

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Not sure

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Yes

If you answered 'yes', please give details.:

You are making yourselves a target for unhappy professionals when you should be helping US to help our patients.

Consent to publish your response

[redacted]

Response ID ANON-PZ3Y-HPK8-H

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-22 15:08:29

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Dispensing optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

No

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

No

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Not sure

If you answered 'yes', please give details.:

Consent to publish your response

[redacted]

Response ID ANON-PZ3Y-HPK9-J

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-21 16:50:36

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Dispensing optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Strongly disagree

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

I have never had an internet site ask for verification of a contact lens prescriptions so they have been breaking your legislation and patient change dates on copy's of prescription to get supplies of lenses, which is very dangerous and will cause problems in the future.

Contact lenses aftercare should be every 6 month or if occasion wearers should be 1 year. Patients are only coming every 3 to 4 years to have check up as having problems with vision because suppliers aren't verifying prescriptions.

I thought the GOC were to protect the public on put them at harm or vision loss.

Especially when we have to pay the GOC to protect the public, I think th me public and suppliers should pay the GOC as well as they are putting Opticians out of business by not having check ups or being able to supply lenses from cowboy internet companies

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

The statement is very vague on aftercare and supports internet site only

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

Should not have loopholes and be very straightforward and clear to understand

8 Are there any aspects of the draft verification and aftercare statement 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.)

Yes

If you answered 'yes', please give details.:

Put us out of business

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Yes

If you answered 'yes', please give details.:

Patient will forge prescriptions to get a supply of lenses with out getting check ups, which internet site DO NOT CHECK ANY MORE so this change will financially optician be out of pocket

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Yes

If you answered 'yes', please give details.:

Prescription products should only be available from Opticans that provide check ups on internet site.

Consent to publish your response

[redacted]

[redacted]

Response ID ANON-PZ3Y-HPKC-V

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-26 09:21:58

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

A definition and guidance on 'substitution' ie an alternative product provided either at the supplier of wearers request/advice

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

As in answer 6

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Not sure

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPKF-Y

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-19 08:28:30

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Not sure

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

No

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPKH-1

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-22 07:35:19

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

No

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Not sure

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

Not sure

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Not sure

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Yes

If you answered 'yes', please give details.:

Loosing safeguards from ordering on line and self prescribing.

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPKM-6

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-19 09:28:06

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Contact lens optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Strongly agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Not sure

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

So long as the px brings in the contact Len's packaging or has statement, email, to where they get / order their lenses from.

Many now but online and can do so with out an in date aftercare.

We still have a duty of care of assess them if the want an aftercare.

If they bring in the cl packs with clear specification, then I think that's sufficient n

8 Are there any aspects of the draft verification and aftercare statement 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.)

Not sure

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

Not sure

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Not sure

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPKN-7

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-25 10:56:40

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:

[redacted]

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

Business registrant / employer

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Strongly agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

No

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

No

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPKQ-A

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-19 08:51:23

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

[redacted]

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

Dispensing optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Disagree

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

The provision of contact lenses, as a "medical device" should not be opened up so completely.

If a problem were to arise the public, in this increasingly litigious age, would be the first to take action against the "supplier" of the contact lenses rather than the prescriber or the manufacturer.

Currently getting some contact lens wearers to comply with wearing schedules, aftercare et al is difficult to say the least, a change as suggested would make it even more difficult

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Not sure

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

Prosecution of suppliers when the GOC is making it easier for the public to obtain C/Ls by relaxing the rules of supply, yet registrants have to comply with Fitness to Practice rules

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Yes

If you answered 'yes', please give details.:

If you open up the floodgate of electronic verification, you play right into the hands of the online suppliers

We have seen many Pxs over recent years who complain bitterly about having to pay for professional services like contact lens checks, but then intend simply to buy C/Ls online

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Not sure

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted
]

Response ID ANON-PZ3Y-HPKR-B

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-20 10:41:08

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Optometrist

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Not sure

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Not sure

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Not sure

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Response ID ANON-PZ3Y-HPKU-E

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-20 07:21:04

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Business registrant / employer

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Disagree

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

There is still no protection for the public from disreputable off shore on line suppliers. At least by being asked to see the original if it had expired the patient should have been told to seek a new specification and after care. These online suppliers will as in most cases just supply on an out of date prescription and the issuing prescribed will now never know.

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

A lack of verification on expiry

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

Over wear, Reduced VA lack of verification. If this is the case why even bother with an expiry date. Is optical professionals we provide a regulated service, regulated by you, but you are again diluting that regulation for online suppliers.

8 Are there any aspects of the draft verification and aftercare statement 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.)

Yes

If you answered 'yes', please give details.:

Yes it discriminates your members who you are supposed to represent. Fee paying members who provide a service to a regulated standard yet allow unregulated off shore suppliers to do what they like.

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

Yes

If you answered 'yes', please give details.:

You are making it easier to buy contact lenses online from expired specifications. The whole thing is a complete joke. You are meant to represent your fee paying members who have to be members to practice yet you're making it easier for disreputable non members to undercut us all.

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Yes

If you answered 'yes', please give details.:

Huge, we will see an increase in CL related disorders. The public will now have much less protection.

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Response ID ANON-PZ3Y-HPKX-H

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-09-30 20:33:34

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Other

If other, please specify:

Former supervising optician also providing "general direction" on behalf of a number of websites supplying lenses to the public

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Disagree

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

Although I broadly agree with the statement, and believe verification is unnecessary, and aftercare can easily be covered by simple advice in writing with each supply (or link to web resources) I have grave concerns in relation to substitution of products. There are two situations that I am aware of where substitution is carried out.

Firstly when a product is discontinued or suffers supply chain issues limiting supply. In such cases a practitioner can indeed make an informed decision with regards to the suitability of alternatives and also warn the patient of the potential hazards and risks.

The second situation is when online retailers deliberately substitute products despite the specified lens being available. They do this with scant regard to patient comfort or safety simply for commercial gain and without proper clinical oversight. Usually these substitute lenses [redacted] are of inferior clinical performance to the lenses they are substituted for particularly in terms of oxygen permeability and safe wearing times

6 Is there anything unclear or missing in the draft verification and aftercare statement?

Yes

If you answered 'yes', please give details.:

A statement on when substitution is acceptable (i.e. when products are in short supply or are discontinued / replaced) and when substitution is unacceptable (i.e. when done for purely commercial reasons despite the prescribed product still being readily available). Guidance on substitution would be helpful in terms of ensuring that the replacement lens has similar characteristics, especially in terms of oxygen permeability and the associated wearing time, otherwise patients whose substitute product is a "downgrade" (which it usually is when based on price) run the risk of wearing a hydrogel lens for the same length of time as a silicone hydrogel lens and therefore over-wearing it and putting themselves at risk of complications.

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Yes

If you answered 'yes', please give details.:

The failure to stamp out unnecessary substitution for commercial reasons without the supervision of a contact lens practitioner will open the floodgates to widespread substitution and potentially destroy the contact lens industry as we know it. The [redacted] business model will become a mainstream model if substitution for non-clinical reasons is not explicitly prohibited and suppliers will feel they have carte blanche rights to substitute any lens with the same basic power for any other lens regardless of fitting characteristics or material properties.

Having supervised websites in the past such as [redacted] (which specialised in selling gas permeable and toric soft contact lenses online) and [redacted] I can assure you that a failure to make the rules clear would be welcomed by entrepreneurs in this field who have little regard for patient safety, only money, and leave the complications to contact lens practitioners and ophthalmologists. Let's not forget that according to Moorfields contact lens related eye problems represent 9% of eye related accident and emergency attendances despite being worn by less than 6% of the population. Acanthamoeba keratitis, which almost always has life-changing consequences such as monocular blindness and enucleation (removal of the diseased eye) has doubled in recent years <https://www.moorfields.nhs.uk/news/outbreak-preventable-eye-infection-contact-lens-wearers> and now infects 100-200 people per year, is not the only devastating disease to affect contact lens wearers. Bacterial keratitis is much more common than acanthamoeba and can have no less devastating results.

All sellers should be brought under GOC regulation as business registrants and the responsible supervising and / or general directing practitioner should be named individuals who must be GOC registrants themselves. Having written the standard operating procedures for several direct to consumer retailers of contact lenses it amazes me that at no point did my involvement or dates of service have to be declared to any regulatory authority.

8 Are there any aspects of the draft verification and aftercare statement 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.)

Not sure

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

Not sure

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Response ID ANON-PZ3Y-HPPD-2

Submitted to Statement on verification of contact lens specifications and definition of aftercare
Submitted on 2023-10-07 23:28:23

Introduction

1 What is your name?

[redacted]

2 What is your email address?

[redacted]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

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

Dispensing optician

If other, please specify:

Background and proposed way forward

Statement

5 To what extent do you agree with the content of the draft verification and aftercare statement?

Agree

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

6 Is there anything unclear or missing in the draft verification and aftercare statement?

No

If you answered 'yes', please give details.:

7 Are there any unintended consequences of the draft verification and aftercare statement or risks that cannot be mitigated against that the GOC should consider?

Not sure

If you answered 'yes', please give details.:

8 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

9 Are there any aspects of the draft verification and aftercare statement 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.)

No

If you answered 'yes', please give details.:

10 Are there any other impacts (including financial) of the draft verification and aftercare statement that you would like to tell us about?

No

If you answered 'yes', please give details.:

11 Are there any unintended consequences of removing our 2006 statement on the sale and supply of optical appliances?

No

If you answered 'yes', please give details.:

Consent to publish your response

12 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]