

**BEFORE THE FITNESS TO PRACTISE COMMITTEE
OF THE GENERAL OPTICAL COUNCIL**

GENERAL OPTICAL COUNCIL

F(24)25

AND

LOKESH PRABHAKAR (01-27897)

**DETERMINATION OF A SUBSTANTIVE REVIEW
10 SEPTEMBER 2025**

Committee Members:	Sara Nathan (Chair) Diane Roskilly (Lay) Vivienne Geary (Lay) Gaynor Kirk (Optometrist) Kalpana Theophilus (Optometrist)
Legal adviser:	Georgina Goring
GOC Presenting Officer:	Leonie Hinds
Registrant:	Present
Registrant representative:	Christopher Hamlet
Hearings Officer:	Terence Yates

Outcome: **Order to expire on 9 October 2025**

DETERMINATION

Background

1. The Registrant registered with the Council as an optometrist on 24 February 2014. The Registrant completed a post graduate certificate in glaucoma at [redacted] in 2015. Between February 2015 and April 2019, the Registrant worked as a locum Optometrist with ASDA opticians.
2. Concerns were raised in March and April 2019, regarding the Registrant's recording of tonometry results, by his colleagues (optical assistants) at the [redacted] store of ASDA Opticians. At this store, the colleague would ordinarily complete the pre-screening tests and the results would be printed and handed to the Optometrist.
3. The concerns raised by the optical colleagues undertaking the pre-screening tests were that the measurements for the intraocular pressures ('IOP') recorded by the Registrant into the patient records did not correspond with the actual results obtained during pre-screening. This included occasions when no IOP results had been obtained and yet measurements were recorded by the Registrant, as well as when measurements had been obtained and what was recorded by the Registrant was different.
4. When this was first noticed, an optical colleague of the Registrant's monitored the situation during a shift on 6 April 2019, by printing out two copies of the pre-screening tests, one of which was handed to him and the other was retained by the colleague in order to check against the Registrant's record keeping. It was noted that the Registrant had not recorded IOPs accurately for patients throughout the shift and there were discrepancies between what had been recorded in the patient records and the IOPs that had been obtained in the pre-screening tests.
5. The concerns were then escalated within ASDA Opticians and an investigation was commenced. This included the review of the Registrant's practices at other stores that he had worked at. A decision was taken to suspend the Registrant from the ASDA locum database whilst the concerns were being investigated.
6. As part of the investigation, a meeting was held with the Registrant on 29 April 2019. At this meeting, the Registrant stated that he pre-populated the IOP fields in the patient record card before the patient came in and he would then change the record card if he had clinical reasons to do so. He accepted that the records were not accurate but said that it did not change the clinical picture as the pressures were normal. He said that he did this to save time and that the numbers were within 'normal' range clinically so there was no issue. He then accepted that the inaccurate recording could affect future diagnosis of the patient. He accepted that entering records in this way was to enter a 'false record'.

7. During the meeting on 29 April 2019, the Registrant was asked whether there was any other part of the patient records that he pre-populated and in response he stated that he pre-populated records of cup to disc ('C:D') ratios, but that he always amended these following the examination. The Council had originally alleged that to pre-populate the C:D ratios of patients was misleading and/or dishonest. However, this aspect of the case was withdrawn during the hearing by the Council's application to amend the Allegation, on the basis that, unlike the tonometry measurements, the Council was unable to prove that the C:D ratios recorded by the Registrant were incorrect, as there were no comparator data or fundus images available.
8. ASDA decided that the Registrant would not be reinstated to its locum database and referred the Registrant to the Council on 2 May 2019.
9. The substantive hearing was held on 5-13 December 2024.
10. At the substantive hearing, the Committee found that the Registrant's fitness to practice was impaired and his registration was suspended for nine months. The order is due to expire on 9 October 2025.

Findings regarding impairment

11. The Committee heard submissions from Ms Hinds on behalf of the Council and from Mr Hamlet on behalf of the Registrant. It accepted the advice of the Legal Adviser. The Committee was reminded of the test for impairment formulated by Dame Janet Smith in the Fifth Shipman Inquiry set out in *CHRE v NMC and Grant [2011] EWHC 927 (admin)*. The Committee was reminded that there is a persuasive burden upon the Registrant to establish that he is fit to return to unrestricted practice. The Committee was further referred to paragraph 24 of the GOC's *Hearings and Indicative Sanction Guidance* which outlines the role of a Review Committee.
12. The Committee first considered whether the Registrant had complied with the suggestions by the previous Committee and whether objective evidence has been provided:
 - a. Evidence of any further relevant CPD or other remediation undertaken, targeted at honesty and integrity in professional practice, interactive discussions with professionals may be of assistance.
 - b. Evidence of further reflection and development of insight, for example an updated reflective statement, including reflections on the learnings from further experiences, CPD and remediation undertaken.
13. The Committee noted that the Registrant has submitted comprehensive evidence of multiple courses he has attended to deal specifically with the dishonesty element of the misconduct. The Committee were impressed by the Registrant's self-motivation demonstrated by his completion of the return-to-work course. In

addition, he had contacted an academy for a bespoke individualised course on honesty. The Committee found that the Registrant has satisfied this particular suggestion and noted that this would have been at considerable time and personal financial cost.

14. The Committee considered the evidence provided of further reflection and development of insight. The Committee had regard to the Registrant's written reflective statement and noted that the Registrant has displayed a high level of insight, he has acknowledged and fully accepted that his actions were dishonest and has demonstrated a high level of dedication to the profession. The Committee was particularly impressed with the Registrant's reflections including:

"Going forward, I am committed to working collaboratively with my colleagues to ensure the highest standard of patient care";

"This event has been pivotal in deepening my understanding of honesty and accountability within a clinical environment" and

"I have also learned that acknowledging mistakes and learning from them is a vital part of professional development."

15. The Committee further considered that the Registrant has fundamentally altered his practice since the misconduct took place, therefore, not only has the Registrant reflected but he has taken tangible actions to address the misconduct. The Committee is satisfied that the Registrant will not pre-populate any clinical findings in the future as he now realises that in doing so his actions were dishonest. Given the evidence provided by the Registrant and the passage of time, the Committee decided that it is highly unlikely he would be dishonest again.
16. The Committee addressed the factors set out in paragraph 24.3 of the GOC's *Hearings and Indicative Sanction Guidance* and considered that:
 - a. After carefully reviewing the Registrant's reflective statement, the Committee considered that the Registrant has fully appreciated the gravity of the offence and he has demonstrated regret and remorse;
 - b. The Registrant has not re-offended in the past six years since the concerns arose in 2019;
 - c. The Registrant has maintained his skills and knowledge through various courses and provided CPD evidence;
 - d. As a result of the significant steps taken by the Registrant, his patients are not likely to be placed at risk by his resumption of practice.
17. The Committee decided that, in all the circumstances, the public interest is best served by allowing the Registrant to return to unrestricted practice.
18. The Committee also had regard to the various references provided in support of the Registrant. The Committee considered the reference, from [Redacted] – Optometrist Manager, dated 6 September 2025 who was aware of these matters and states *"I have never had any concerns regarding his honesty or integrity."*

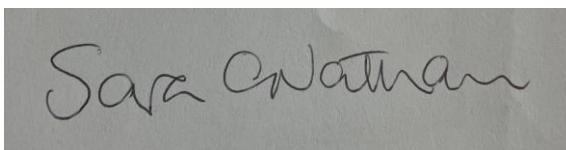
19. The Committee considered that being dishonest can present a risk of harm to patients. However, given the high levels of insight and significant remedial steps demonstrated, the Committee concluded that the risk of repetition of this type of misconduct is now low.
20. The Committee was mindful of the test for impairment, which was set out by Dame Janet Smith in The Fifth Shipman Report, cited and approved in the case of *Grant*:
- a) *Whether the registrant has in the past acted and/or is liable in the future to act so as to put a patient or patients at unwarranted risk of harm;*
 - b) *Whether the registrant has in the past brought and/or is liable in the future to bring the profession into disrepute;*
 - c) *Whether the registrant has in the past breached and/or is liable in the future to breach one of the fundamental tenets of the profession.*
 - d) *Whether the registrant has in the past acted dishonestly and/or is liable to act dishonestly in the future.*
21. The Committee considered that in all the circumstances none of these factors are currently engaged.
22. The Committee found that the fitness of Lokesh Prabhakar to practise as an optometrist is not currently impaired.

Declaration

23. The Committee makes a formal declaration that the Registrant's fitness to practise is no longer impaired for the reasons above.

Chair of the Committee: Sara Nathan

Signature



Date: 10 September 2025

Registrant: Lokesh Prabhakar

Signature present and received via email

Date: 10 September 2025

FURTHER INFORMATION	
Transcript	
A full transcript of the hearing will be made available for purchase in due course.	
Appeal	
Any appeal against an order of the Committee must be lodged with the relevant court within 28 days of the service of this notification. If no appeal is lodged, the order will take effect at the end of that period. The relevant court is shown at section 23G(4)(a)-(c) of the Opticians Act 1989 (as amended).	
Professional Standards Authority	
<p>This decision will be reported to the Professional Standards Authority (PSA) under the provisions of section 29 of the NHS Reform and Healthcare Professions Act 2002. PSA may refer this case to the High Court of Justice in England and Wales, the Court of Session in Scotland or the High Court of Justice in Northern Ireland as appropriate if they decide that a decision has been insufficient to protect the public and/or should not have been made, and if they consider that referral is desirable for the protection of the public.</p> <p>Where a registrant can appeal against a decision, the Authority has 40 days beginning with the day which is the last day in which you can appeal. Where a registrant cannot appeal against the outcome of a hearing, the Authority's appeal period is 56 days beginning with the day in which notification of the decision was served on you. PSA will notify you promptly of a decision to refer. A letter will be sent by recorded delivery to your registered address (unless PSA has been notified by the GOC of a change of address).</p> <p>Further information about the PSA can be obtained from its website at www.professionalstandards.org.uk or by telephone on 020 7389 8030.</p>	
Effect of orders for suspension or erasure	
To practise or carry on business as an optometrist or dispensing optician, to take or use a description which implies registration or entitlement to undertake any activity which the law restricts to a registered person, may amount to a criminal offence once an entry in the register has been suspended or erased.	
Contact	
If you require any further information, please contact the Council's Hearings Manager at Level 29, One Canada Square, London, E14 5AA or by telephone, on 020 7580 3898.	