

Stakeholder Perceptions of the General Optical Council

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For: The General Optical Council

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Key findings

The Optical Sector

- Disruptive technological change was most frequently described as one of the biggest challenges, and was seen to be an important issue for both the GOC and the optical sector more generally.
- The changing role of optometrists and education were also frequently mentioned as key issues facing the sector.
- The rise in patients' need for ophthalmic care and the Government's review of professional regulation were mentioned as other challenges facing the GOC.

Perceptions of the GOC

- Stakeholders were familiar with the GOC and generally regarded it positively.
- On average, the GOC was given a favourability score of 3.8 out of 5. A majority of responses were either neutral or positive and those with higher levels of engagement with the GOC were far more likely to be favourable towards it.
- Of a given list of 13 characteristics, the GOC scored highest for two of its three core values – being *principled* and *responsible*. It received lower scores for being a *thought* leader and *innovative*.

Engagement

- Perceptions of the GOC's engagement varied amongst stakeholders, but most felt it had started to improve. On average, it received a score of 3.9 out of 5 for being easy to deal with, and 3.5 out of 5 for its overall engagement.
- Stakeholders were generally positive about their personal day-to-day contact with the GOC, and felt that instead it was the communication of the organisation as a whole that was in need of improvement.
- The most commonly suggested improvements were being more pro-active, providing more follow-up and communicating more frequently, particularly through more informal means.

The GOC's performance

- The GOC received mostly neutral scores for its performance, largely due to the fact that
 whilst stakeholders did feel that the GOC performed its functions well, its processes
 were deemed far too slow.
- The GOC received the highest score for its registration function and the lowest score for its research projects, which was largely due to a lack of awareness of their existence.

Looking ahead

 Education was by far the most frequently mentioned area for the GOC to prioritise going forward. Adapting to technological change and improving engagement also received mentions.



The Optical Sector



Challenges facing the optical sector

What would you say are the biggest challenges facing the optical sector at the moment?

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Limitations of legislation

Changing role of optometrists
Increase in opthalmics
Ageing population

A majority cited disruptive technological change as one of the biggest challenges facing the optical sector, and the main reasons for doing so were three-fold. The first of these was speed; stakeholders commented that technological change was, by its very nature, rapid and constantly evolving. They were concerned that the optical sector would not be able to keep up with the sheer pace of technological development that was occurring. It was felt that the content of university courses and relevant professional qualifications would need to be adapted in order to ensure that professionals were adequately trained and able to develop the skills necessary in order to practice amidst the new technological advancements, and stakeholders felt that it was not easy enough to do so at the pace required.

"It's probably very difficult for a body that's limited by statute to take account of a lot of these technological advances." – Government

"The very big challenges of technological change, which will impact on how we test sight, how we supply vision correction and the skills that our professionals need to keep pace with those developments." — Professional body

Secondly, stakeholders made similar observations about the need to adapt regulation to reflect the impact of change and also raised concerns about the pace at which this could be achieved, if at all.

Thirdly, technological change was perceived as somewhat of a threat to the sector by some who worried that developments such as the ability of consumers to conduct their own automated eye tests online could one day render the role of optometrists obsolete. Even amongst those who did not necessarily think technology was a threat to the role of optometrists, there was a perception that it would certainly cause their roles to change. The ease of access that patients had to information through the internet meant that professionals could be questioned much more by their patients, and so had to adapt to provide more guidance and support as opposed to merely a diagnosis. The sector's workforce was therefore perceived to be in need of recalibration, so that optical professionals were supported in their role by technology rather than replaced by it.

"How do we break out of the straitjackets that are often set by legislation, to get ourselves a more flexible, more agile, more cost-effective, more responsive system of regulation?" – Regulator



"Normally the GOC would regulate the person but it completely goes outside of their jurisdiction the moment it goes abroad. And so there is a serious question about the viability of some of what the GOC does. If you regulate people in the UK but you can't regulate people outside, you immediately enter a two-tier system where the professional inside the UK is probably at a disadvantage from the people that are outside the UK." — *Professional body*

Indeed, another frequently cited challenge facing the sector was the changing role of optometrists. Stakeholders identified a need for more ophthalmic care to be given in the community and anticipated that this need would only continue to grow, given the ageing population. The role of an optometrist was therefore understood to be expanding, and stakeholders felt that this had to be reflected in education and training.

Some also mentioned that the sector needed to ensure it was producing enough optometrists in order to meet this increasing demand, rather than merely ensuring that the professionals it already had were correctly trained.

However, the question of whether or not staff levels were sufficient did vary slightly by region. Whilst most stakeholders who raised the issue did say that the sector would need to ensure it could meet the demand, stakeholders in Northern Ireland commented that the market was already saturated with professionals and as a result, wages had been pushed down. There was also a recognition that the current demographic make-up of optometry professionals led to a high level of staff turnover, for instance by women leaving to start families, and that this had to be kept in mind.

"We're now much more equipped with information, we know where to get it, we know how to use it, and the role of the professional changes in that environment. It's much more about guiding and supporting and helping the patient, the public, the customer even, come to the right decision, but it's very much now the public's decision, not the professionals'." — Regulator

"We need to be looking at the role of the optometrist in the future, so where technology can support practice to be more efficient perhaps. Then alongside that, we need to be looking at expanding the role of the optometrist, be involved much more heavily in providing services that are not just sight tests." — Professional body

"There isn't enough capacity to meet the demand. We haven't got enough Ophthalmologists to do the work that's required and we also have policies that are driving care more into the community, more into primary care." — Government



Challenges facing the GOC

When asked to identify the challenges that were facing the GOC, many of the same themes emerged. Stakeholders certainly felt that as the regulator, the GOC had a role to play in addressing the issues the sector was facing and so was being impacted by the same challenges.

Technological change was mentioned most frequently as a challenge facing the GOC. Stakeholders recognised that many of the changes taking place were outside of the scope of the GOC's powers to limit or stop, for instance online sales. They felt that it would thus be a challenge for the GOC to continue to ensure patient safety whilst patients had access to optical products that they could not necessarily regulate. Even in the instances where the GOC could regulate, stakeholders worried that the GOC was not fast-paced enough to keep up with the advancing technology. It was felt that the GOC should be doing more to anticipate the advancements and stay one step ahead so that their legislation and codes of practice could remain fit for purpose, as opposed to having to continually update their literature in order to keep up with changes that had already occurred.

"The big macro challenge is how do we as an industry set ourselves us to deliver safe, reliable care in a world where technology is transforming the means by which that's delivered and the way in which patients expect it to be delivered?" – *Employer*

"Making sure that there is proper regulation and proper protection for the public in place as new technology starts to come online." – Government

Some stakeholders linked the GOC's capacity to keep up with technological change to the need to secure its very existence. Just as stakeholders had worried that technological change could render the role of optometrists obsolete, so too did they worry that the GOC would struggle to justify its role or assert any authority if it was not able to regulate emerging technologies that were present in the sector. A number of stakeholders mentioned the Government's review of professional regulation, and expressed concern about the possibility that the GOC might be merged with other regulators.

"I think their very existence is in question, isn't it? So I think that'll be their biggest challenge." — Educator

"There's things that are happening which are beyond the scope of their powers. So it's very hard to ensure patient safety in the context of that." — Government

The rise in ophthalmic care and increasing need for provision of primary care by optical professionals were also frequently referred to as issues facing the GOC. As this was perceived as a wider healthcare issue rather than one that was unique to the optical sector, stakeholders felt that the GOC may need to look to working closer with other regulators to identify how to best manage the change.



"The optometric profession is qualified well enough to act as a primary health provider. And it's going to have to become so because the NHS cannot afford to carry on the way it is at the moment, in England." — *Professional body*

"The development of primary care. It's a very different healthcare system and optometrists need different things in different nations... I'm not sure they've quite worked out how they're going to meet that yet." – *Government*

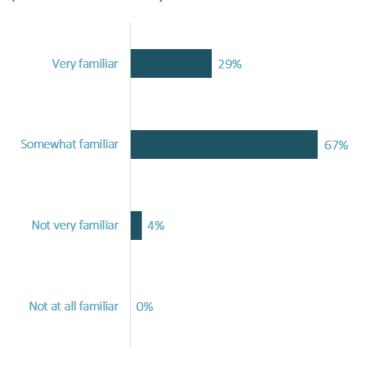




Familiarity with the GOC

Stakeholders were reasonably familiar with the GOC and its work – none felt unsure of what the GOC did. A majority defined themselves as *somewhat familiar* with the GOC, a minority defined themselves as *very familiar* with the GOC and just one stakeholder said they were *not very* familiar.

How familiar are you with the General Optical Council?



Many commented that their contact was limited to their own remit, and so whilst they were familiar with the part of the GOC that they worked with, they were far less familiar with the wider organisation. This was not perceived as in need of change; it was considered inevitable that they would be predominantly familiar with the GOC's work in their own area and indeed, no stakeholder expressed that they felt insufficiently familiar with the GOC.

A few stakeholders were relatively new to their role or had only recently begun communicating with the GOC, but these stakeholders were also content with their level of familiarity and were confident that this would naturally increase over time.

"I know what they do. I have regular contacts with colleagues at the GOC. I suppose in a broad sense I would say six out of ten, something like that, but if you were to test me on details of their policy on various optics related issues, then, no, I'm probably two out of ten. But in terms of their broad regulatory emit and ethos, yes, I understand that" – Regulator

"I have dealings with the General Optical Council. I'm aware that they're the regulatory body for opticians and the disciplinary body. But beyond that, do I know a huge amount about their workings? Probably not." — Government



"Reasonably familiar. I've got reasonably good contacts, I've got a reasonable idea what they're about; I've been to their offices plenty of times, so a reasonable understanding." – Regulator

"I've had a lot of dealings with the General Optical Council with regards to regular visits and that sort of thing. I think I am fairly familiar with what goes on." — Professional body

"As familiar as one would be if they have to interact with them on a regular basis. I know the kind of stuff it does. Some things a little bit more than others, inevitably." -Educator



Favourability towards the GOC

Stakeholders recognised that as a regulator the GOC was not likely to be viewed very positively. It was accepted that the GOC had a difficult job to do and as one stakeholder summarised, "generally speaking, the regulated doesn't love the regulator." Therefore, whilst the GOC was not presumed to be widely liked, this was more the result of its nature as a regulator than any comment on the organisation itself. The GOC was not thought to have a level of favourability any lower than that of other regulators such as the GMC or GDC and some stakeholders remarked that in fact, they thought that the GOC had a more favourable reputation amongst its stakeholders than some other regulators did.

"They're a regulator; a regulator isn't anybody's favourite thing. But I think they do a reasonable job given the circumstances they're in" — *Professional body*

"I think that they are maybe not as positively viewed by some people I think as they might be, but the same could be said for the General Medical Council, I suspect, by medics." — *Professional body*

"The impression that I had from the qualified people going in with me was that they had a little shiver going through the front door — this was like going to see the policeman when they'd done something wrong. I didn't feel any of that at all quite honestly. But I think there is a slight perception that the GOC's the nasty guys." — *Professional body*

In terms of their own attitude towards the GOC, the majority of stakeholders expressed that they were either neutral or somewhat favourable. An overwhelming majority of stakeholders who had a view towards the GOC, were positive towards it. Where stakeholders did not describe themselves as favourable, this was more the result of positive and negative aspects of the GOC cancelling each other out, than them having an unfavourable view towards it. On average, the GOC was given a favourability score of 3.8 out of 5.

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Those with higher levels of engagement with the GOC were more likely to be more favourable towards it and felt that this was key to the GOC improving its reputation with others.



Where stakeholders spoke of experiences that had tempered their otherwise favourable view of the GOC, they tended to speak of instances where it was felt the GOC could have communicated better, been more transparent or given more timely feedback.

Stakeholders who gave the GOC a high favourability score said they had done so because of constructive engagement and a positive working relationship with it. The GOC also received praise from these stakeholders for its accessibility, its staff and its commitment to its work. Even amongst those stakeholders who considered themselves as neutral as opposed to favourable towards the GOC, it was felt that the GOC evidently took its role seriously.

"My frustration is there are actually probably a lot of really good people in the GOC and if they could be a little bit more listening, a little bit more accessible, a little bit more pragmatic, that would really help." – Employer

"Because I've had a lot of dealings...I would say I'm a quite GOC friendly person. I work quite positively with them and I am a positive advocate and a flag flier, and that certainly helps." – *Employer*

"I'd say I'm perfectly reasonable. I've got no issues with them anyway. Limited contact with them, but my contact with them has been fine." – Government

"I haven't had any major difficulties with them, but they haven't done as much as I feel they should as quickly as I feel they should." – Government



Perceptions of the GOC

When asked to describe the GOC in their own words, stakeholders offered a mix of positive and negative descriptions. Many simply associated the GOC with its functions, and so said phrases such as "regulators", "fitness to practice" and "education". This showed that there was a high level of awareness of the functions that the GOC performed, and that it was closely associated with its regulation of the sector. Stakeholders gave conflicting responses when characterising the GOC – some described it as "slow", "bureaucratic" or "hard to reach", whilst others said the GOC was "approachable", "willing to listen" and "fair". The lack of uniformity in responses suggested that there was an inconsistency in the GOC's relationship with its stakeholders.

What would you say are the first three words or phrases that come to mind when you think of the General Optical Council?



"People spring to mind instantly, so I tend to think of those individuals rather than the organisation. But the thing that is absolutely highly valued and paramount in my mind is their fairness and that is a major, major, major strength. This is so entrenched in all they do. I assume it is for other regulators, but you don't get quite the same quality of commitment to fairness and fair dealings. And that includes patients and public patients, registrants, stakeholders, you know there's a very strong willingness to be fair and to listen and to discuss." — Employer

"When I think of the GOC, I tend to think, look, it does perform a really important function. I tend to be probably frustrated. Probably frustration with the GOC is my biggest overriding emotion." – *Employer*

"Maybe a little bit detached; from the patient perspective that I work in, I'd say a bit removed from that, hence the need to perhaps have maybe better engagement." — Patient group

"Immediately what comes to mind is I think for everybody what comes to mind is disciplinary action. The minute you say GOC you just immediately think oh don't get in trouble with them." — *Professional body*

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I do think they are seen as something removed, something hard to reach, something that is inward rather than outward facing. I think they seem quite nit-picky and dealing with the tiny issues rather than the really big ones. They're not very forward-thinking, outward-looking, if that makes sense." – Government

"Regulator and profession. Because that's the major thing." – Educator

"Approachable and willing to listen and discuss policy." - Government

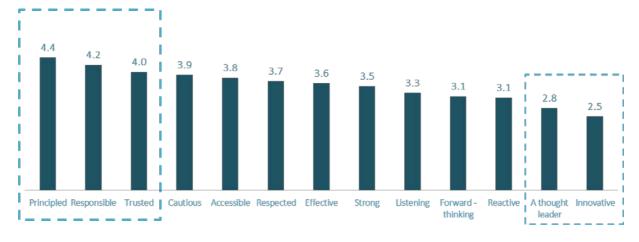
"First and foremost, they are the regulators of the profession. But they've stepped outside of their original scope of role and they are looking very specifically about public protection. Very often my colleagues in the optical sector will say, well, all the GOC is supposed to do is keep a list; whereas I would say that they understand that their function is a lot more than that and that they've really tried to address that." — Professional body

"Visionary. I do actually think – and I think it's partly their leadership – they're quite creative in the way they think about problems and quite exciting to deal with." – Regulator

When given a list of 13 characteristics and asked to what extent they described the GOC, stakeholders scored highest for two of its three core values. Stakeholders were most likely to agree that the GOC was "principled" and "responsible". For its third core value, being "forward-thinking", the GOC was given an average score of 3.1.

"Stakeholders were least likely to agree that it was "a thought leader" or "innovative", though they did not all think it was necessarily the role of the GOC to be as such. There was a higher level of agreement that the GOC was "accessible" than it was "listening". Stakeholders felt that the GOC was relatively easy to get in touch with, but it was less certain whether or not feedback was listened to and taken on board.

I have a list here of some particular characteristics, can you tell me how much you agree - on that same 1-5 scale - that the GOC is...





Many stakeholders agreed that they thought of the GOC as an organisation that embraced and tried to enable change. It was felt that historically, the GOC would not have been thought of as such and that there had been a conscious effort to rectify this. These stakeholders pointed to its push for legislative reform, as well as its consultations and attempts to discuss issues facing the optical sector as evidence of this.

Even amongst those stakeholders who did agree that the GOC had been trying to embrace change more, it was felt that a need for significant improvement remained. The GOC was considered to move too slowly to implement meaningful change in a timely manner and indeed, very few stakeholders described the GOC as innovative or forward-thinking. However, not all stakeholders agreed that the GOC should enable change. Some felt that as a regulator, the GOC should not be directing change but instead, should merely support it when other bodies – such as the Government – are implementing change in the sector.

"They might listen but I don't know whether they actually do anything about it." — Educator

"I'm not sure it's their place to be a thought leader, really. I'm not sure that that's their area of responsibility and, consequently, it's not something I would... look to them as a thought leader. I would certainly canvas opinion, but it's not a place I would go for somebody that I feel is a thought leader in areas apart from their area as a regulator." — Professional body

"They do take their responsibilities very seriously... nobody's doubting their principles at all." — Educator



The GOC's presence in debates

The GOC as a leader in debates about healthcare and professional regulation

Stakeholders' views on how often the GOC featured in discussions about the future of healthcare varied. Very few stakeholders said that the GOC never featured in discussions, but similarly, few said that it featured frequently. Most commonly, stakeholders had known the GOC to participate in the discussions on occasion but did not consider them a key player. Where the GOC was known to have contributed to discussions, its input was praised and stakeholders felt it was listened to.

"They're certainly not on the back foot. They are leading in the areas that they should be leading. We're often treated as the last in the pack of the other regulated professions, and I think it was important that we made sure that each meeting, our points were being made and we were being heard as an industry." — Employer

"In fairness to Samantha, there have been a number of times when she and I have been in the same debate or on a panel at the same type of event. And so I think in terms of the GOC being out and about and having a voice, it has one."

— Employer

"There was a perception among senior colleagues in the sector that the GOC weren't as vocal as they could be, or weren't as present as they could be. And I think the GOC, when that was mentioned in passing at a meeting, had said, well actually, we've been taking forward our discussions." — Professional body

"I think they are central to the debate and I think they do that through Samantha. Possibly punching above their weight slightly because of her positive contribution." – Regulator

"You know when you're sitting around a table with the GOC, by and large you're going to get some interesting, insightful, forward-looking stuff, and that's a value." — Employer

All stakeholders felt that the GOC could have more of a presence in discussions and indeed, whilst few stakeholders considered the GOC to be currently acting in a leadership role in debates about the future of professional regulation, there was a shared belief that as the optical sector's regulator, the GOC could and should act as more of a leader. Many conceded that by virtue of the size of both its organisation and its sector, the GOC would always be perceived to carry less clout than larger regulators such as the GMC. The optical sector was considered by some to be smaller than other areas of healthcare such as dentistry and nursing and it was considered logical that debates about the future of professional regulation would be dominated by larger organisations such as the GMC.



"They're relatively small compared with organisations like the GMC or the GDC and so necessarily they carry somewhat less clout in that sense, but they have a valuable contribution to make. I have attended events where the GOC has been up there as key note speakers, so it would certainly not be fair to say they are a passive follower of what everyone else does. For obvious reasons they've got less clout than others, but I don't think that means they're passive. In my experience they use what clout and knowledge and wisdom they have very sensibly." — Regulator

"I think they face lots of inherent challenges with being the size they are and the position they have with the profession that they regulate being marginal from the wider health agenda." – Regulator

But this was not to say that stakeholders thought the GOC should not participate in debates about the future of healthcare or professional regulation, or to try to take more of a leadership role in them. It was felt that by taking on a greater role, the GOC could raise the profile of the optical sector as part of the healthcare profession.

The public was thought to consider optics as a retail profession rather than a healthcare profession, and stakeholders felt that by increasing its presence in debates about healthcare and professional regulation, the GOC could begin to rectify this view. It was felt that eye care was often not regarded as part of healthcare in the same way as other healthcare sectors such as dentistry were, and that eye health issues were often at the fringe of healthcare discussions. By increasing its presence in debates and raising its profile with parliamentarians, stakeholders hoped that the GOC could raise the importance of eye health. Some also felt that given the move to increase ophthalmic care in communities rather than hospitals gave the GOC an even bigger mandate to participate than before, as it would have to co-ordinate with other healthcare regulators and the NHS on how to manage the transition and change to the provision of services.

"The majority of us at some point in our life will require eye correction of some form or the other. You would think that puts them with a vastly more powerful mandate than they seem to have." - Employer

"The GMC, I think, would have a larger profile, as you would expect them to. I don't get the sense the GOC is leading the discussions around the future of healthcare." — Professional body

"I would like to see the GOC take more of a leadership role and to increase the position of Optometrists within the healthcare field. I think the general public tends to see the profession, in a sweeping generalisation, as a sales profession, sort of retail. Whereas, I think most Optometrists certainly, and I suspect a lot of Dispensing Opticians, see us as a healthcare profession." — Educator

The GOC as a leader in debates within the optical sector



There was certainly an awareness amongst stakeholders that the GOC had been increasing its presence in debates within the optical sector, but there was no consensus as to whether or not this was a good thing. The GOC's involvement in debates within the sector often prompted comments on its collaboration.

There was a perception that the GOC had formerly operated in isolation from the rest of the sector, and would identify solutions on its own rather than collaborating with other organisations in the sector and discussing how best to approach their challenges. It was recognised that the GOC had begun in recent years to change this and increase its presence in the sector by involving itself more in discussions and consulting more often. This was generally welcomed in terms of increasing collaboration, and stakeholders hoped that these efforts to work closer with the wider optical sector would continue.

"It comes across very much I think as following rather than leading. A classic example would be the undergraduate education review which is so crucial and yet the rather leisurely proposal timetable for that that was put forward to Council and Council fortunately rejected. But it should've been thinking about these things some time ago and should be thinking about them far more actively." — *Professional body*

"It depends on who's leading the complication or the subject, or the area that they're supposed to be looking after. If it's them, then they'll be quite forward-thinking. But if it's something that other areas of associations or the profession need their guidance or help, they aren't always as forthcoming or as wanting to do it as quickly as you would like." — Professional body

"It's not to say that the GOC are not taking an active interest, but it's not so much a collaboration and sitting down and trying to come to a solution, more imposing that solution." – *Educator*

However, this did not necessarily translate into enthusiasm for the GOC taking on a leadership role. Whilst stakeholders felt that as the regulator it was essential for the GOC to have a presence in discussions, there was little consensus as to what the nature of their role within the debates should be.

Stakeholders recognised that as the sector was comprised of a number of different organisations it was not often clear where the lines between their respective responsibilities were drawn. Some stakeholders felt that it was more the role of the Association of Optometrists (AOP) or The College to take a lead, and not within the remit of a regulator to be leading discussions about the future of the sector. Those stakeholders who did not feel that the GOC should necessarily have a leadership role in the sector suggested that it should only be involved in discussions concerning their statutory functions, rather than in discussions about the optical sector more generally.

"I'm not sure there is, given it's a clouded sector with so many regulators, a leader overall. It's problematic. But there will certainly be areas where the GOC would need to be leading." – Government



"LOCSU seems to have more of a leadership role. This is more the practicalities but there is still policy and consultation documents which are very driven by LOCSU which would be a role that maybe the GOC could pick up on more." — Patient group

"I think actually the College of Optometrists has an interesting role to play, because I would expect them to have more of a leadership role in terms of developing the profession. The GOC should be a regulator. They shouldn't be trying to do what the College does." - Educator

In contrast, other stakeholders felt that as the regulator, the GOC should have more of a leadership role in discussions. It was thought that in order to regulate the sector effectively, the GOC needed to have a thorough and up-to-date understanding of the range of issues that optics was facing. The GOC was expected to have a strong view on the challenges that were facing the sector, and these stakeholders thought it should have a prominent role in helping the sector to identify, plan for and take action to meet these challenges.

"The College will always be the body that the profession turn to, not the GOC; which is really strange because they are the regulators and they're the only ones who have the power to strike somebody off the list." — Professional body

"I think they could be, I think they're in a position to be, but I'm not sure that they are. I think they could collaborate better. They have powers as a regulator and I think if they collaborated better, they could use these powers well." — *Professional body*

"It could...it's as well placed as anyone. But because it feels an organisation that's more geared to imposing things as opposed to working with the wider industry, I think it counts itself out of playing that role." – Employer

"I don't think they should just sit back and just wait to see what falls out of the sky, as it were, once everyone else has been part of the discussion. Because they need to have a say on what they're going to regulate." — Professional body

The GOC's contributions to debates

Stakeholders recalled the GOC contributing to debates and discussions on the following issues:



- Legislative reform
- Education
- Guidance documents
- Public perceptions of the sector
- Reform of professional healthcare regulation

"The thing that's impressed me most is the quality of strategic thinking that comes out of the GOC, and I think it's ahead of the average. The biggest example for me is the debate around reform of professional healthcare regulation, where the contributions I've seen from the GOC have been insightful and enlightened and progressive." – Regulator

"One of the things that's most interesting about them is the approach they take to the regulation and consumer protection agenda in relation to optical eye care products, particularly contact lenses, which they have a different role and quite a different posture from other regulators." — Regulator

The issuing of their guidance documents was quite vocal and they were certainly at professional conferences that we were at and came around to stands and just made sure that people had sight of those." — Patient group

"I've seen presentations from Samantha Peters, the Chief Executive, on different regulatory thoughts. They have an active involvement in regulatory groups we have in Scotland, so I think they strike the right balance between being collegiate and also mentioning possible innovations and considering the future." — Government

"They have certainly been helpful and useful in discussions around legislative reform. I think I was particularly struck in debates about the future of regulation in optics, and a particular presentation I saw by the Chief Executive which I thought was extremely stimulating, and about what that might mean for regulators having to change the way they think." — Regulator



The GOC's relationship with the public

Some stakeholders felt they had little knowledge of how the GOC interacted with the public, and so did not feel comfortable commenting on whether or not it took their views into account. However, those stakeholders who did feel comfortable commenting referred to the consultation at patient focus groups on the recent standards, as well as the GOC's general complaints function as evidence that it did consult the public and take its views into account. It was recognised that engaging with patients and the public could be difficult as there would not necessarily be an interest amongst the public for further engagement, and some stakeholders commented that patients only really engaged if something had gone wrong.

"It's always very difficult to engage with patients, because as we know, they don't engage until things go wrong by and large; they've got better things to do with their lives. But I think to the extent that they can, the GOC does engage." — Professional body

Stakeholders were unanimous in their belief that the general public didn't know much, if anything, about the GOC and its role. Stakeholders were divided however, with regards to whether this needed to be addressed. Generally, stakeholders considered it sufficient that that the public know that a body exists that they can make a complaint to, and be able to get in touch with the GOC if needed.

Stakeholders reasoned that the public would know that at some level, professionals were regulated and would have little interest in any further detail. As one stakeholder summarised, "I think people naturally assume in the British system that somewhere in the system professionals are being regulated; by who and how, I don't think people really mind until something goes wrong."

Additionally, it was accepted that the public would know far less about the GOC than other regulators such as the GMC, simply by virtue of having a much lower profile and fewer public cases of misconduct.

"I think people naturally assume in the British system that somewhere in the system professionals are being regulated; by who and how, I don't think people really mind until something goes wrong." — *Professional body*

"People know who the GMC are but I don't think people know who the GOC are. But that's probably reflective of the fact that we don't kill many patients." — Professional body

"Eye health generally doesn't get the press and the external reviews that it should do and the GOC could help to do that by indicating that they very seriously take a role in making sure that eye healthcare is provided to the highest level within the high street." — Professional body

"The public understanding in this space is lousy. I'd suggest that these people know an awful lot more about teeth than they do about eyes." — Professional body



"The more cases you get going through your regulatory body, the more issues, the more wider profile I would think. The fact that there never seem to be - with an obvious recent exception - many high profile cases means that the profile of the GOC is likely to be a lot less. That's the reality of it. Whether it should be higher, the answer to that is yes, it should." – Government

Many considered it both unnecessary and undesirable for the general public to know more about the GOC. For some, it was felt that a higher level of public consciousness would merely encourage more complaints to be made and investigations subsequently carried out. For others, there was no need for a regulator to have a public front or for the public to know about the work it does.

"I don't think they should have a public front really. They're very much around regulating the professions and the different groups and maintaining standards and registering practitioners." – Educator

"If people are too aware of your existence, then that can obviously have an issue if you're getting a lot of referrals into your regulatory process." — Government

I don't think it's needed at all. The public needs to understand the role of the optometrist. I don't think the public need to understand the regulator, just in the same way as I don't think the public would be particularly interested in the General Medical Council in terms of doctors." — *Professional body*

Some stakeholders, however, did think it may be beneficial for the public to know more about the GOC and its role. Rather than promoting itself, stakeholders suggested that the GOC could raise its profile in order to raise more awareness amongst the public about the level of regulation that there is. Similarly, by increasing visibility of the optical sectors' regulator, some stakeholders thought that the GOC could draw attention to the importance of eye health.

"Regulators shouldn't be raising their own profile per se. What they should be doing is raising the awareness on the part of the public and, indeed, the profession that the service is well-regulated. I know that sounds like a bit of a nuance, but there is a difference between promoting the GDC, say, or the GOC and promoting good regulation of the services." – Regulator

"I think that they should be more visible. If you look at the GMC which is the equivalent, it's a very visible body, everybody knows about it, it's commonly asked its opinion about various different things, people recognise that it keeps standards high, what its regulatory functions are. Eye health generally doesn't get the press and the external reviews that it should do and the GOC could help to do that by indicating that they very seriously take a role in making sure that eye healthcare is provided to the highest level within the high street." — *Professional body*



"Having more awareness in practices, for example, that's where the public facing tends to be. If you look at the College of Optometrists, they're sending out a little promotional material for people to put in their practices. Maybe the GOC could do something similar." – *Educator*

The GOC's relationship with devolved nations and other groups

There was no indication that the GOC was insufficiently engaged with any of the devolved nations, nor that it focused too heavily on one nation or region at the expense of others. A majority of stakeholders were based in England and did concede that by being based in London, it was plausible that stakeholders in other nations could perceive the GOC as either London-centric or focused predominantly on England. But stakeholders in the devolved nations did not generally believe that was the case and instead, most spoke of regular visits from the GOC and positive engagement. However, some did comment that it was a difficult task for the GOC to regulate across the UK as each of the devolved nations have slightly different healthcare systems, and that it could do better in taking this into account.

"They've proved to be extremely proactive in engaging with the devolved nations. And we have never had that level of engagement before." — Professional body

"I think they do. And don't forget they also engage with some of us as national bodies, which include all four countries. So as well as engaging with the countries directly, and I know they do, they give presentations and what have you, they also, of course, engage with those of us who represent all four nations." — *Professional body*

"My experience is no that they don't seem particularly London centric they do reach out to all the institutions in the UK that they regulate because they regularly come and visit us; they regulate our students. So no I don't feel that particularly although they always hold their meetings in London which is a bit annoying but that's not a massive issue." – Educator

"I would have said it was a regulatory body for the whole of the UK. Absolutely." — *Professional body*

It was recognised that the GOC had a wide range of stakeholders, whose views and priorities it had to manage and many were sympathetic to how difficult this could be to manage. Generally though, the GOC was considered to manage this well and whilst some stakeholders remarked that the GOC was 'feared' by its registrants, it was not perceived to be at odds with its professionals. Despite probing about whether or not the GOC was too closely aligned with groups such as big businesses or professional bodies at the expense of others, no stakeholders suggested that the GOC was. Instead, it was felt that GOC remained neutral and managed its wide stakeholder base well.

"I don't personally get the sense that they are close to big business in the negative sense. I think it is almost inevitable that their relationships would focus on some big businesses, but that's just how the sector is composed." – Regulator



"I'm not aware they are at logger heads with their registrants at all. I know there are some other regulators that are and that the GOC is certainly not among them." — Regulator "I certainly wouldn't say I've seen any evidence that they are inappropriately aligned. Clearly, they will have a lot of relationships across the sector. But can I say that any of those will be inappropriate? No, I don't think I could." — Government

Leadership and management

Many stakeholders did not feel they had sufficient knowledge of how the GOC was run to comment on whether it was a well run organisation or not. Most of these stakeholders argued that in the absence of any evidence to the contrary, they had no reason to believe it was not well run. Similar observations were made when asked whether the GOC was heading in the right direction, or if it made efficient use of its resources.

Those who did feel comfortable commenting on the GOC's management remarked that its structure hadn't appeared to work well in the past, but noted that it had begun to substantially improve in recent years. Some mentioned Samantha Peters and Alistair Bridge and those who did so commented positively on their leadership.

"I've never been led to believe that things aren't functioning well but I have got no evidence to suggest that I know that things are particularly good or otherwise." — *Professional body*

"Their governance is fantastic, it really is. And they've got a good bunch of people working for them as well." – *Employer*

"GOC's project management is absolutely amazing, far better than it's ever been before, so the projects are very much fit for purpose, but basically I feel sometimes the strategy is wrong." – *Employer*

"I think they are well-led and they care about what they're trying to do." – Regulator

One frequently cited observation was the high level of staff turnover at the GOC. Whilst it did suggest that the GOC was open to change, some stakeholders felt this had negatively impacted on the GOC's engagement as the new staff did not have sufficient expertise of their organisations. The organisation was also perceived by some as slow and, at times, bureaucratic and stakeholders spoke of need to improve communication channels within the organisation.

"From the outside if it looks to have a lot more staff than it had ten years ago when I joined, only it doesn't seem to be noticeably any more efficient." — Professional body

"I just feel like the one hand doesn't know what the other hand is doing, it needs a good overview." – Educator

"It doesn't seem to be terribly well-run as far as the communication channels go." — *Educator*



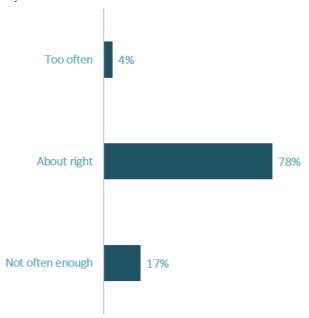
Engagement



Ratings of the GOC's engagement

Stakeholders were generally positive with their personal day-to-day contact with the GOC - very few, if any, considered them hard to deal with. Most felt that the GOC was accessible and they could easily get in touch with a member of staff there GOC if desired. Some stakeholders mentioned that they felt the GOC had been focusing on improving its engagement recently. It was recognised that there had been an effort to be more visible in the sector and to consult more often. This consultation with stakeholders, as well as the consultation about the ongoing education review was pointed to by some as evidence of this. It was felt that the level of general communication from the GOC had increased – albeit slowly – and that it was clear the GOC was making an effort. A majority of stakeholders described the frequency that the GOC communicated with them as about right. Those who weren't satisfied with the frequency of engagement were far more likely to say that the frequency of communication was not often enough than to say it was too often; just one stakeholder said the latter.

How would you describe the frequency that the GOC communicates with you?



"I suppose about right. I would say if we did want to speak to them we could do so." — *Professional body*

"I would like to see more of them, if I was honest, but one of the reasons why I don't see as much of them as I would like is simply because of the weight of issues I'm dealing with here; it's not always possible to make the time. So I wouldn't want my answer to that question to be necessarily taken as it being the GOC's fault that we don't see them enough. It takes two to tango." — Regulator

I think, possibly, slightly more regularly, but I also understand that there are changes going on and their need to appoint the correct people into the correct roles, because there have been changes." – Educator



"I think the communication is about right, and they're open for more communication should I want it." — *Professional body*

Though there were common complaints and common points of praise, there were certainly disparities amongst stakeholders with regards to their comments on the GOC's engagement. This was not due to their stakeholder type, and disparities existed within different stakeholder groups. Despite their level of engagement or their satisfaction with it however, there was a shared belief amongst stakeholders that the GOC's engagement could be improved. Just two stakeholders said that they were fully satisfied and could not identify a way in which the GOC could improve their engagement with them.



Very easy, yes, no problem at all. It's easy to pick up the phone and just speak to the right person." – Government

So in my position, would I be able to get hold of the GOC? Yes, I feel like I absolutely would. Would I feel they're interested in my opinion? Not so much." – *Employer*

"Sometimes their lack of flexibility isn't a personal thing, it's their legislation and rules that tie their hands. So sometimes you can see that there could be a solution to a challenge but it's frustrating when you can't understand why they can't introduce that solution, because they have a rule in place which could be easily reformatted." — Professional body

"It's got better. If you asked me a year ago I would have said it was quite poor because I'd send an email and not get a response for weeks and I'd have to send repeated emails until I eventually got a response. Now, I get a response in a more timely fashion." — Educator

There are meetings going on, which is good, but there are still pieces that are being missed. We're getting into the right place, but we're not quite there yet. I think it's about connecting the conversations we have in those meetings to the actions that then follow." — *Professional body*

Improving engagement

The communication of the GOC as an organisation was perceived to be in need of improvement. Stakeholders were sympathetic to the individuals they were in contact with,



but felt that the legislation that the GOC was governed by, as well as its own internal processes led the organisation to often come across as inflexible and slow. Many stakeholders expressed frustration with the feedback process – whilst stakeholders may have felt comfortable getting in touch with the GOC and were satisfied with the frequency of contact they had, they did not necessarily feel that the GOC acted on what was raised in these exchanges. Other suggested improvements included being more collaborative with other forums and groups involved in the sector and consulting earlier.

"Being a bit less bureaucratic and a little more open. They're absolutely terrified of revealing anything too soon or to one party before another party. I'd rather know what they're thinking at an early stage and have an opportunity to input, than at a late stage when they've already gone down half a path and they're then consulting." — *Professional body*

"We don't get much feedback as to whether they've taken our points on board or whether they can't do something about it."—*Professional body*

"There are very formal consultation exercises; there are a number of GOC committees. What there isn't is much informal discussion where the common ground emerges." – Employer

"Follow-up is sometimes a little bit thin on the ground. We're all guilty of having very good meetings and very good decisions and courses of action and then doing almost nothing about it." — Regulator



Be **more proactive:** Even some stakeholders who were otherwise satisfied with their engagement with the GOC noted that they had initiated the relationship themselves.



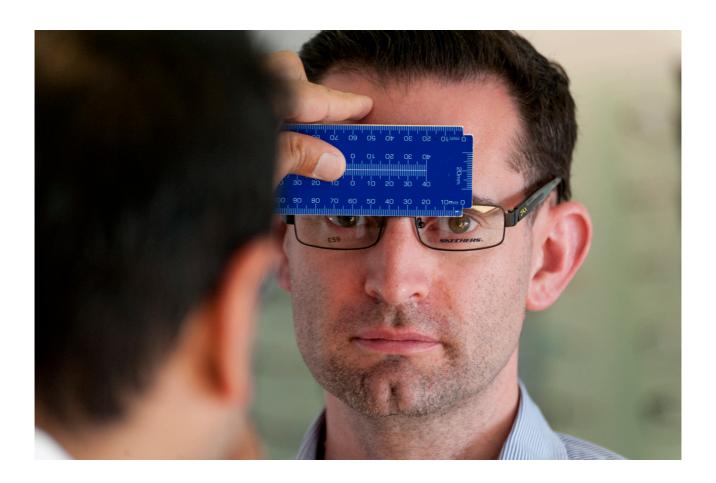
Provide more **follow-up**: Amongst stakeholders who felt they could easily get in touch with the GOC and be listened to, there was uncertainty amongst some as to whether their feedback was acted upon.



Communicate more frequently, particularly through more informal means. Having more information available on the website or sending out regular newsletters were cited as useful ways of keeping stakeholders up to date with the GOC's activities.



The GOC's performance



Performance of its key functions

The GOC received mostly neutral or mildly positive scores for the performance of its key functions. Whilst stakeholders did feel that the GOC performed its functions well, the processes were considered far too slow.

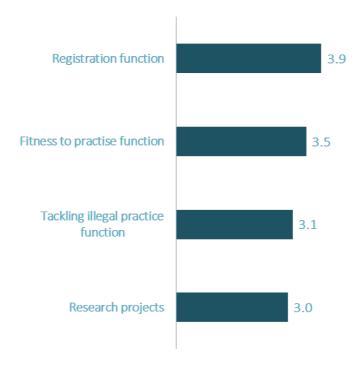
The GOC scored highest for its registration function, with an average score of 3.9 out of 5. Though it was considered to work reasonably well, some stakeholders questioned the necessity of registering students and mentioned concerns about its data records being kept accurate and up to date. The process was also considered to work too slowly, and stakeholders complained of waiting for weeks at a time for numbers and documents to be issued.

"I think that works reasonably well. It is just quite slow." — Professional body

"I think on the whole it works decently. If I compare it to pharmacy, pharmacy don't require their students to be registered. And I think that's actually a more effective system." — Employer

"I don't think they keep up very well with their data. They don't keep on top of their addresses and things." — Educator

How would you rate the GOC's performance in the following areas using a 1-5 scale where 1 is very poor and 5 is very good?



The GOC also scored relatively well for its fitness to practise function, though it was cited by many stakeholders as an area in need of addressing. The process was regarded as particularly slow and cumbersome, with investigations known to go on for more than a year in some cases. It was also felt that the level of information and feedback provided to those being investigated throughout the process was very poor.



"I don't think the process is timely; it takes years for these things to follow through. They appear to take an unusual stance in my view and they would argue this but this is our perception that the defendant is guilty until proven innocent." — Employer

"The areas they're very effective in is in fitness to practice and fair dealings with people and in running their register, apart from when they lose data or give it away. But they're reasonably efficient in process terms." – *Professional body*

They've moved on massively, but they still need to work quite hard at the speed and the way in which they deal with complaints, investigate complaints and then follow up with a disciplinary procedure. I'd call it out as quite underperforming, mainly because of the length of time it takes to investigate, because I still see disparity in the way in which complaints are handled." — *Employer*

The GOC's illegal practice function received similar appraisals – broadly, it operated well but its processes were far too slow. There was however, far less uniformity in stakeholders' responses. Some commented that the GOC was better geared towards regulating those who are already registered, as opposed to deterring illegal practice and catching those who are practicing illegally. Others felt that the GOC didn't exert enough authority in this area, and pointed to the GOC's recent work on online contact lens sales as evidence of this.

"The toolkit they have is designed to regulate people who are registered. It's potentially not designed to deter and catch and prevent people from practicing illegally." — Regulator

"Because of where they've got to on the voluntary code of conduct that it's a neutral because they're neither positive nor negative on that one, they've just currently missed a massive opportunity." – Employer

"I think it's knowing what people are doing that's the problem. I think once they get to hear about it, then I think they're good at it." — *Professional body*

"I think there's a really clear process for the consideration of individual registrants and they're reporting that. I think it could just go faster. Used to take a long time for the cases to get an answer." – Employer

Knowledge of the GOC's research projects was very low. Many stakeholders were unaware that the GOC conducted any research and thus did not feel comfortable providing a score for it. A handful of stakeholders were also unconvinced that the GOC should be conducting research at all and felt that it was the responsibility of other organisations as opposed to the regulator to do so.



"I'm conscious of their research activity, and I know it makes a contribution and I'm sure it is perfectly well-commissioned, but when I think of the GOC I don't think, fantastic research function." – Regulator

"There's nothing about that on their website that I've been able to identify....I didn't realise that that was actually a particular function of what they did." — Professional body

I don't see why a regulator carries out research. I don't get it, what are they commissioning research into? I don't really know why registrants' money is being used on research when the College, for example, got half a million from NIHR to carry out a project into the impact of visual problems in people with dementia and Alzheimer's." — *Professional body*



Recent developments

New standards of practice

It was generally agreed that the GOC had consulted adequately on its standards, and even stakeholders who felt otherwise negatively towards the content of the standards themselves commented that they could not fault the GOC for the development process. The new standards were the most frequently mentioned piece of work when stakeholders were asked to name the GOC's most important achievement over the past three years, and were praised as well-thought out and consulted upon. Nonetheless, there were a couple of stakeholders who did comment that they had not felt part of the process enough and thought the GOC could have begun consulting earlier than they did.

On average, the GOC was given a score of 3.7 out of 5 for its development of the new standards

Whilst stakeholders were reasonably happy with how the standards were implemented, a few employers commented that those who had not been involved in the consultation process had not been aware of it and so were surprised when the new standards were introduced. Some stakeholders also remarked that they did not feel the GOC had given sufficient feedback on the consultation, particularly in terms of explaining why suggestions that had been given to the GOC had not been included in the new standards

"That was well consulted on. Absolutely. Quite different from the way they brought in their CET regulations." — Educator

Whilst we may not agree with the content, the way that we were engaged with we have no issue with at all." - Professional body

"Well, it could've been better. They probably could've engaged the professional bodies more upfront." – *Professional body*

"I think if there was anything, a message out of this, it would be that feedback loop, the fact that when information goes in, you get an understanding of, okay, yes, we've listened to that, we looked at that; this is the reason why we're not accepting this. That would go a long way in communication." — *Professional body*



"I think there was a sort of general feeling that they perhaps didn't involve a wide enough network of people in the initial phase. It's only when it went to consultation, and obviously most of the documents had been not quite finalised but a lot of it was in place and unable to be changed." — Educator

Though the consultation process on the standards received broad praise, many raised concerns about the content of the standards itself. It was felt that the standards were not well-written and were difficult to understand. This not only made it harder for people to digest but also harder for people to fully understand the regulations they were expected to comply with. Other concerns raised related to candor and consent, standards for students and standards for business registrants.

"We thought that the extension of the standards almost as intrusive into a student's personal life was overbearing. And actually, the student standards should only relate to what is expected of them when they're actually operating within an optical environment." — *Professional body*

"I feel that they really missed a trick to enable the profession to get better set up. So we've had a lot of feedback from our clinicians to say they don't understand why the code is onerous. They definitely feel it's a step backwards and they're concerned about the changing environment of their own personal risk in a world where the rules are so prescriptive." – *Employer*

"They were very, very careful to try and get everything in and that left a rather stodgy pudding, whereas the thing could've been far more easy to digest for practitioners and people who are training practitioners on the ground. So their Standards are far more verbose than those, for example, of the General Medical Council or those of the HCPC. But the outcomes are exactly the same. But, gosh, I'd far rather read the HCPC one from the GOC's one." — *Professional body*



CET scheme

Perceptions of the changes to the CET scheme were mixed, though stakeholders were more likely to be unfavourable than favourable towards them. Those who were unfavourable towards the recent changes criticised them as cumbersome, difficult to navigate and poorly explained. It was felt that there had not been enough consultation on the changes, nor in some cases any forewarning that they were taking place.

Many contrasted their experience with CET to the implementation of the new standards, and said that the latter had been consulted on far more widely. Some also commented that they thought the CET was too onerous, with far more of a focus on process than outcomes. Nonetheless, there were a number of stakeholders who were happy with the changes to CET and in particular, the changes to peer review were praised.

"Pleased with the changes to CET, but not pleased with how the changes were made. So it all came in last-minute, with very little communication; the systems didn't come on-board until after the stuff came into place." — Professional body

"CET scheme is a pile of pants. It's absolutely nonsense in the way it's constructed. It treats the profession like children, not adults." — *Professional body*

"Their requirement for their CET programmes are, as far as I can see, not evidence based and the bureaucracy around running a training course has become ludicrous and, from my point of view, very expensive." — Educator

"As far as a person that supplies CET, I saw that the hoops we have to jump through these days are getting quite onerous, and I'm not sure they actually benefit the end user." — Professional body



Online contact lens sales

Generally, perceptions of the GOC's work in this area were unfavourable. Many did commend the GOC's attempts to address the issue and conceded that it was an exceedingly difficult area in which to regulate. The GOC was praised for its collaboration with the industry; it was thought to have engaged with a broad population and to have remained transparent throughout the process. Nonetheless, the code was ultimately condemned as "toothless" and largely ineffective. Many felt it had been unwise for the GOC to attempt to regulate in this area as it does not have a global reach and would have found it hard to enforce an attempt to regulate online sales. It was also suggested that the code could have disadvantaged those selling products in the UK to those selling products overseas, and some stakeholders were unconvinced that it was even an issue of concern to patients.

"It started off as quite a good idea and it ended up like the toothless tiger really. It's not going to cut any mustard anywhere, that's the trouble. It's not a bad set of words but it's got nothing to underpin it" — Professional body

"Well, they got themselves in a real mess, didn't they? They have to stick very much to their core function and appreciate that they do not have a global reach." — Educator

"I completely understand why the GOC might have been frustrated with that piece of work, but the way in which they went about doing it was exactly the sort of thing. And the way in which I would certainly encourage the GOC to work in the future." — Employer

I think that the process itself was transparent and it was an area that needed to be looked at. And I think the GOC have proved themselves to be responsive to what stakeholders would like the GOC to consider." – *Professional body*

"I felt that they did a lot of work on something that wasn't that important. It was important to the businesses, but is it important to the patients? I think that there are much bigger issues that the optometry profession is facing and they got caught up doing a lot of work on quite a little detail." — Government



Other issues raised when discussing the GOC's performance included:

Data breach

The data breach was mentioned by a couple of stakeholders. Whilst it was generally felt that the breach had damaged slightly trust in the GOC and its reputation, some did comment that the GOC had responded well and had demonstrated that it had learned from the error. As one stakeholder said "I think the thing that they did get across with the industry very well is the lesson learned element."

Review of professional regulation

The Government's review of professional regulation was mentioned by a number of stakeholders. In many cases the review was referred to as a threat to the GOC's existence and a couple of stakeholders went on to affirm their belief in the need for the sector to have its own regulator. Stakeholders felt that if the GOC were to be merged with other healthcare regulators, the optical sector would be sidelined.

Office relocation

The relocation of the GOC's office was only mentioned by a handful of stakeholders, but none of those who spoke of it regarded the move positively. Most frequently, stakeholders questioned the high cost of the move and whether it was necessary to be located in Central London. Others commented that the process had moved too slowly.





Key priorities

If we were to speak to you again in 2020, what is the one thing that you hope the GOC will have done by then?



Education was by far the most mentioned area that stakeholders wanted the GOC to prioritise in its new strategic plan. There was no single aspect of education that stakeholders focused on, but those mentioned included considering the requirements across the four nations, increasing the clinical nature of undergraduate degrees and assessing student numbers. Stakeholders were also concerned that as the scope of practice for optometrists continued to increase, it was essential that this was reflected in curriculums and assessments so that courses could continue to produce graduates that were adequately trained and fit to practise. Many were aware of the GOC's ongoing education review and wanted the GOC to focus on getting its recommendations implemented.

"The undergraduate education review and getting it implemented. And thinking about, in the light of that, what registration would and should look like in the future." — *Professional body*

"I hope they will have tackled the education piece so that we have not only a set of professionals that are able to do the work that they need to do in the changing world that's happening, but also we have a new cohort of students and trainees coming into the profession and they are educated at the right level." — Professional body

"To change the education and to be a leader and informer of education to ensure that the competencies of the profession meet the needs of the NHS and the patients of the day, of 2020. I want them to be progressive in that respect." – Government

Adapting regulation so that it remains fit for purpose amidst technological change was also frequently mentioned. There was concern that regulation was not keeping up with the pace of technological change and was not structured to take into account the reality of the increasing role of the internet and the subsequent presence of overseas suppliers in the UK. In addition to adapting to the changes that were already underway, stakeholders wanted the GOC to future-proof itself and plan strategically for how the sector may change in the future.



"It's important that they continue to work to innovate and see what they can do to improve... to adapt for the future markets the way that the optical sector's changing, without legislation being likely in the near future, or at least scope what they might need to have legislative change for. I guess it's future proofing themselves." – Government

"I'd love them to focus on the capacity and graduating calibre of optometrists. And I would like them to enable the industry to create new business models that will better serve patient need." – *Employer*

"Maybe communication with the general public with regards to raising their profile and even within that raising their profile and educating the general public as to who they are, really clarifying what the Optometrist's role is and who Optometrists are." - Professional body

"I don't know where the optical sector's going to go, but I think in the next five years there should be more clarity, and I think they need to come up with a plan of how to take into account some of these developments and keep patient safety as being paramount importance." – Government

"I would like to think that they will become more flexible, understand some of the problems that are emanating from the new technologies and the internet and have some understanding of how that impacts on the rest of the sector and that they've got to make their judgements knowing that there are these two competing bits out there — domestic and perhaps overseas — and that being able to throw the book at someone in the UK is fine, but if somebody does the very same thing, but externally, and you can't touch them at all, then it becomes very one-sided or becomes very frustrating for the profession." — *Professional body*



Appendix 1: Participants

The GOC provided Populus with a list of 41 stakeholders. Of the 30 stakeholders that Populus interviewed, the following 26 were happy to be listed as participants. Four stakeholders requested to remain anonymous.

Doug Perkins, Chief Executive, Specsavers

Sali Davis, Chief Executive, Optometry Wales

David Brown, National Optometry Contract Lead, NHS England

David Hewlett, Chief Executive, Federation of Opticians (FODO)

Mercy Jeyasingham, Chair, Vision2020 UK

Ian Humphreys, Chief Executive, College of Optometrists

Mathew Hill, Director of Strategy, General Dental Council (GDC)

Joy-Belle Myint, Programme Lead, Optometry, University of Hertfordshire

Simon Rodwell, General Secretary, Association of Contact Lens Manufacturers

Richard Marchant, Assistant Director of Regulation, Policy, Strategy and Communications, General Medical Council (GMC)

Ben Fletcher, Managing Director, Boots Opticians

Jonathan Lawson, Chief Executive, Vision Express

Duncan Rudkin, Chief Executive, General Pharmaceutical Council (GPhC)

Claire Slade, Superintendent Optometrist, Asda

Jason Birch, Head of Regulatory Unit, Scottish Government

Nicola McElvanney, Chair, Optometry Scotland

Marcela Votruba, Head of School, Optometry and Vision Sciences, Cardiff University

Cheryl Donnelly, Chief Executive, British Contact Lens Association

Tony Garrett, General Secretary, Association of British Dispensing Opticians (ABDO)

Karen Dempsey, Chair, Optometry NI

Henrietta Alderman, Chief Executive, Association of Optometrists

Mike Ockenden, Association of Independent Opticians

Barbara Ryan, Chief Optometric Advisor, Welsh Government

Karen Brewer, Head of Communications, International Glaucoma Association

Bryony Pawinska, Chief Executive, Federation of Manufacturing Opticians

Gunter Loffler, Programme Lead, Undergraduate Optometry Programme, **Glasgow** Caledonian University



Appendix 2: Discussion guide

Awareness and understanding of the sector

Let's start broadly:

What would you say are the biggest challenges facing the optical sector at the moment? What needs to be done to address the issue?]

How familiar are you with the General Optical Council?

- Very familiar
- Somewhat familiar
- Not very familiar
- Not at all familiar

What would you say are the first three words or phrases that come to mind when you think of the General Optical Council?

How favourable or unfavourable are you towards the General Optical Council?

- Very favourable 5
- Fairly favourable 4
- [Do not read out 'Don't know' but code here] Neither favourable nor unfavourable 3
- Fairly unfavourable 2
- Very unfavourable 1

Role of the General Optical Council

In your own words, how does the General Optical Council fit into the wider optical sector in the UK? How does the General Optical Council fit into the wider healthcare / regulatory environment in the UK?

How often does the GOC feature in discussions about the future of healthcare in the UK that you have or read about?

- Frequently?
- Sometimes?
- Occasionally?
- Never?

Do you consider them as having a leadership role in debates about the future of professional regulation? Or do they simply follow the debate?

And what about the optical sector more specifically - do you consider the GOC as a leader or a follower in debates about the future of the optical profession? Do you think their views are heard? Do you think that the GOC should lead? Why/why not?



What can you recall of the GOC in the past 12 months – has anything stood out to you that they have said or done? [Probe: have you noticed that the GOC has been trying to take more of a leadership role?]

Do you think of the GOC as an organisation which embraces and tries to enable change? Can you provide any examples?

Do you think of the GOC as a regulator for all of the UK? Or do you think it is focused too heavily on one nation or region? Is it sufficiently engaged in all the devolved nations of the UK?

Do you think that the GOC takes the views of patients and the public into account enough? Do you think the general public know enough about the role of the GOC? Are they accessible enough?

Is there any more they can do to be more responsive to the views of patients/the wider public?

Are they too close/aligned with any one group at the expense of others?

Leadership and management

Do you think of the GOC as an organisation that is well run? Does it make efficient use of its resources? Does it have good customer service?

Has your view of the GOC changed at all in the past 12 months? Has your view improved, worsened or stayed the same?

Do you think that the GOC is heading in the right direction? Why?

Engagement

Let's move on to how well the GOC communicates with you.

How would you describe the frequency that the GOC communicates with you?

- Too often
- About right
- Not often enough

How easy or difficult do you find the GOC to deal with on a scale of 1 to 5 where 1 means very difficult and 5 is very easy?

How would you rate their overall engagement with you, again on a scale of 1 to 5?

And would you say that has got better or worse over the last 12 months? Why?

How could the GOC improve its engagement with you? Have you had to engage with the GOC on any specific issue in the last year? Do you think it is easy enough to gain access to GOC staff members to raise concerns?

I have a list here of some particular characteristics, can you tell me how much you agree - on that same 1-5 scale - that the GOC is:

Accessible



- Effective
- Cautious
- Innovative
- Reactive
- Respected
- Trusted
- Strong
- Listening
- Forward-thinking
- A thought leader
- Responsible
- Principled

Performance

What do you think have been the GOC's most important achievements over the past three years? Do you think it has had any important failures?

Following a consultation with stakeholders in 2015, the GOC introduced its new Standards of Practice for individual registrants, and separate Standards for students on April 1 2016. Were you aware of this?

Q8: How well do you think the GOC handled the development of the new standards of practice, using a scale of 1-5 where 1 is very poorly and 5 is very well? And using the same scale, how well do you think it handled the introduction of the new standards of practice?

The GOC recently made some significant changes to its CET scheme, which were implemented for the 2013-15 cycle. What do you think about it? Do you think that the implementation of the enhanced scheme was handled well or poorly?

The GOC recently undertook work to improve the regulation of online contact lens sales – through the development of a voluntary code of practice for online suppliers. How would you rate the GOC's work in this regard?

How would you rate the GOC's performance in the following areas using a 1-5 scale where 1 is very poor and 5 is very good?

- Tackling illegal practice
- Fitness to practice function
- Registration function
- Research projects

Future strategy development

Finally, let's move on to talk about strategy.

The GOC is currently considering its new strategic plan for 2017-20. What areas do you expect them to focus on?

What would be your key priorities for the GOC to focus on? What should it do more of? What should it do less of?



What are the challenges facing the GOC over the next few years?

And finally, if we were to speak to you again in 2020, what is the one thing that you hope the GOC will have done by then?

Conclusion

Is there anything else about the topic that you think we might have missed and you would like to discuss?

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