

General Optical Council

Stakeholder perceptions research 2022

Research report

June 2022

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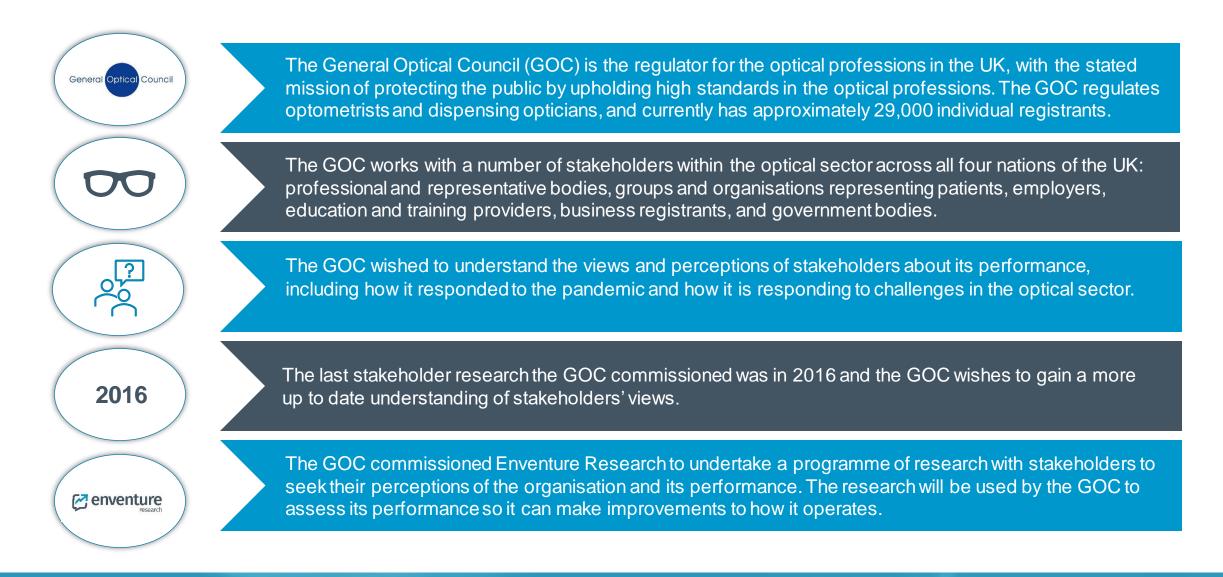
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Research programme overview

Introduction and research objectives





Methodology overview

Stakeholder in-depth interviews

- 30 in-depth qualitative interviews
- Interviews took 30-40 minutes and were conducted via video calls by experienced researchers
- A topic guide, agreed with the GOC, was used by researchers
- Participants were recruited from a list provided by the GOC
- Interviews were recorded to allow playback by researchers and for notes to be made for analysis
- Feedback was given anonymously

Business registrant survey

- A questionnaire was designed by the GOC and Enventure Research
- The survey was securely hosted online and personalised invitations to take part were emailed to all GOC business registrant
- The survey took approximately 8-10 minutes to complete
- The survey was live between 27 April and 16 May 2022. During this time, 147 responses were received, response rate of 5.3%





Who took part in the stakeholder interviews?





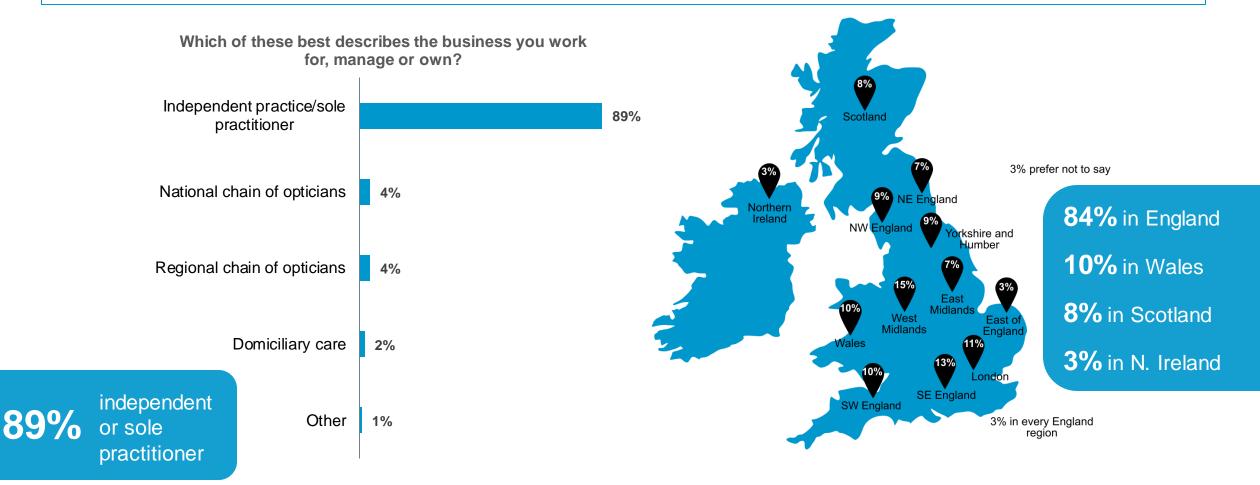
Interpreting feedback from in-depth interviews

- When interpreting the qualitative research information collected via in-depth interviews, the findings differ to those collected via a quantitative survey methodology because they are not statistically significant.
- In-depth interviews are collected to provide additional insight and greater understanding based on in-depth discussion and deliberation, which is not possible via a quantitative survey. For example, if the majority of stakeholder participants hold a certain opinion, this may or may not apply to the majority of the target audience.
- In-depth interviews were digitally recorded, and notes made to draw out **common and key themes**.
- Only common and relevant themes are detailed in the report, rather than every viewpoint that was expressed.
- Verbatim quotations have been used as evidence of qualitative research findings where relevant.
- Quotations are anonymous.



Who took part in the business registrant survey?

The vast majority worked in **independent practices or as sole practitioners** – large employers were represented in the stakeholder interviews. There was a good spread of responses from **across the UK**.





Interpreting survey results

- As the online survey was completed by a sample of GOC business registrants and not the entire business registrant population, all results are subject to **sampling tolerances**.
- This report contains various tables and charts. In some instances, the responses may not add up to 100%. There are several reasons why this might happen:
 - The question may have allowed each respondent to give more than one answer
 - Only the most common responses may be shown in the table or chart
 - Individual percentages are rounded to the nearest whole number so the total may come to 99% or 101%
 - A response of between 0% and 0.4% will be shown as 0%.
- No subgroup analysis has been included as base sizes are too small for meaningful analysis.
- In some cases, response options have been grouped to provide an overall level. For example, 'total agree' and 'total disagree'. Where combined percentages do not equal the overall level reported (being 1% higher or lower), this is due to percentages being rounded to the nearest whole number.
- Verbatim comments from open-end (free text) questions have been read in detail and coding frames developed to show thematic analysis and categorisation of themes.

Terminology and abbreviations used in report

GOC	The General Optical Council	HCPC The Health and Care Professions Council
HEI	Higher education institutions	GOS General Ophthalmic Services
Optom	Optometrists	OCCS The Optical Consumer Complaints Service
DO	Dispensing opticians	CPD Continuing professional development
ESR	The Education Strategic Review	IPC Infection prevention and control
EDI	Equality, diversity and inclusion	FTP Fitness to practise
СЕТ	Continuing education and training	



Key findings: Stakeholder interviews

Perceptions of the GOC

- Many reported good relationships with the GOC based on mutual trust, with many feeling engaged and supported
- Many hold the GOC in high regard, thinking it carries out its functions effectively and want to see it continue as an independent regulator
- Despite changes in staff in senior leadership positions, most thought that the current leadership is moving the organisation in the right direction
- Some felt some staff at the GOC would benefit from gaining a deeper understanding of the sector
- Despite a great deal of positivity about the GOC, there were some perceived weaknesses, which included:
 - Defensiveness in the face of constructive criticism
 - Too much influence from large multiples
 - Don't always listen and act on feedback from stakeholders
 - Responsiveness to communication
 - Insular working practices
 - Limited input from patients and the public
- There was some positivity about the Strategic Plan and the organisation's ability to meet its objectives
- There was some **doubt** about the GOC's ability to **plan ahead strategically** and horizon scan



Perceptions of GOC functions and communication and engagement

- There was some **praise for the ease of use** of the register and the website
- Many had noticed that the fitness to practise process had recently improved in terms of time it takes to reach resolution, clearing a backlog and filtering of cases; however, some felt there was still some way to go to reduce the time it takes to resolve cases
- Some education and training providers had noticed improvements in the format and process of GOC visits; however, there
 were still some challenges noted
- There were mixed perceptions of the ESR some felt it was a great achievement, but others criticised the consultation
 process, suggesting it was still dogged by issues and rushed, and some felt the rationale and evidence for the changes had
 not been clearly communicated
- Some thought the move to CPD had been a great achievement, whereas others noted issues such as delays in communication and technical issues
- Many felt that communication had improved greatly over the last couple of years, particularly during the pandemic; however, a few thought responsiveness had worsened which they blamed on working from home practices
- Some noted that GOC communication needed to be important, relevant and to stand out to ensure readership



Pandemic response

- There was lots of positivity about the GOC's pandemic response, with praise for its flexibility, easements of rules and regulations and the COVID statements
- However, there was some criticism that the GOC was slow to react, with initial delays to releasing guidance and the COVID statements, and how it did not push for registrants to be classed as key workers
- Some thought the GOC had worked well with other optical bodies to ensure consistency in communication and guidance, whilst others thought other bodies in the sector took a lead in the sector response because they were in a better position to do so
- A few employers thought that transitioning out of emergency COVID measures had been chaotic at times, with businesses not being given enough notice to change working practices and there being uncertainty when expiration dates passed without new direction being given



Challenges in the optical sector

- Technological advancements were generally thought to be beneficial to patients, but would pose a challenge in terms of
 regulation for the GOC and it was felt that the GOC needed to be one step ahead to appropriately regulate
- Regulation of online sellers of lenses and spectacles based overseas was a challenge that was cited by many, but there
 were mixed opinions about what the GOC should be doing to address it
- Issues with the General Ophthalmic Services (GOS) contract were raised, and it was felt that it needed review to ensure that it worked for businesses, particularly given the changes to registrants' scope of practice
- There were reports of substandard abilities of some students and newly qualified registrants, which some felt could
 pose a risk to standards in the sector
- There was reported disparity in the delivery of eye care in different parts of the UK, with some feeling that the standard was lower in England in comparison with Wales and Scotland, and that soon GOC standards would need to reflect the divergent skills needed to work in different areas
- Many mentioned workforce issues, such as increasing numbers practising locum work and working part-time, as well as there being an uneven spread of optometrists across the country, leading to shortages in some areas
- Long outpatient waiting lists in ophthalmology were cited, with care moving to primary care settings where appropriate, which could increase risk in the profession
- Quite a few felt that the optical sector was crowded, and is becoming more polarised and fragmented



Priorities for the GOC

- Many mentioned the current call for evidence on the Opticians Act, which many agreed with as they felt the Act was out of date; however, there were mixed opinions about whether large scale changes were required or if it just needed tweaking to bring it up to date
- Some felt that the GOC had an important role to play in addressing the workforce challenges, whilst others felt that the GOC's ability to contribute was limited given its function as the regulator, but it could still support the sector through engagement, education and research into the issues
- A few stakeholders thought the GOC would play a vital role in ensuring registrants had the appropriate skills and training for the changing scope of practice through education and training
- A few felt the GOC could involve patients and the public more in its activities and work to raise its public profile, as well
 as that of the sector, as many patients did not understand the differing roles in the sector and how best to access eye care
 when they needed
- Several thought the GOC should continue to focus on supporting and communicating with its stakeholders, and addressing issues with responsiveness
- Some thought that there were some low levels of confidence in the GOC in the sector that could be addressed through raising its profile and widespread communication about its function

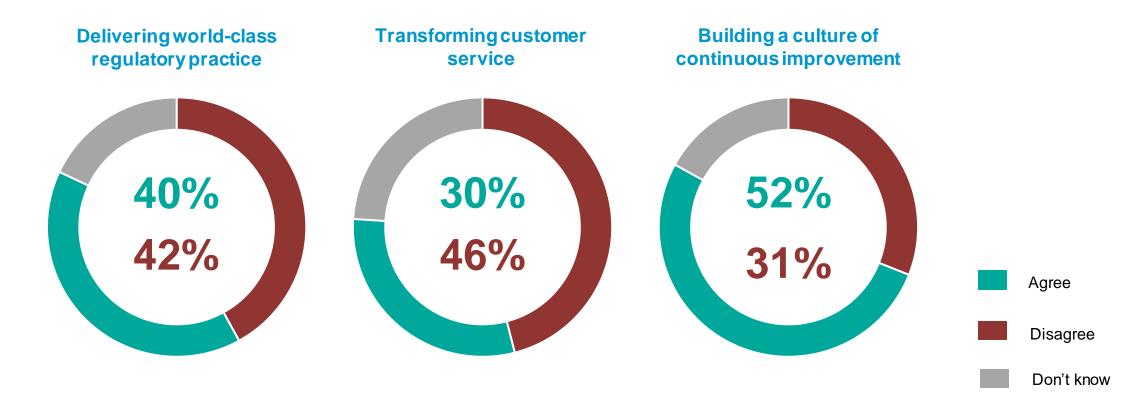


Key findings: Business registrant survey

Strategic Plan

Whilst over half agreed the GOC is *building a culture of continuous improvement*, less than half agreed it is *delivering world-class regulatory practice* and *transforming customer service*.

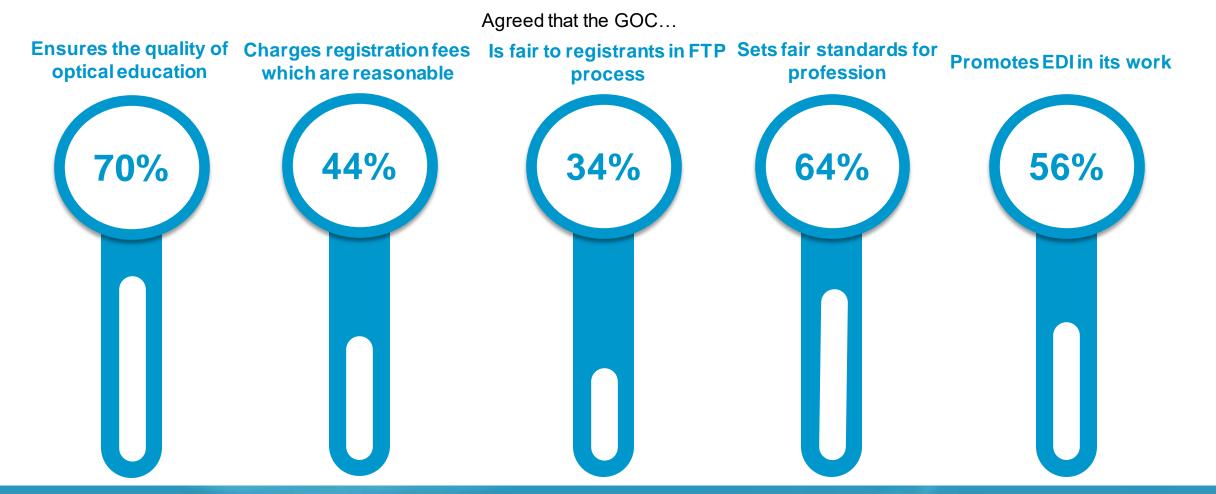
For each of the aims below, to what extent do you agree or disagree that the GOC is meeting its three strategic objectives outlined in its Strategic Plan 2020-25?





Perspectives of GOC

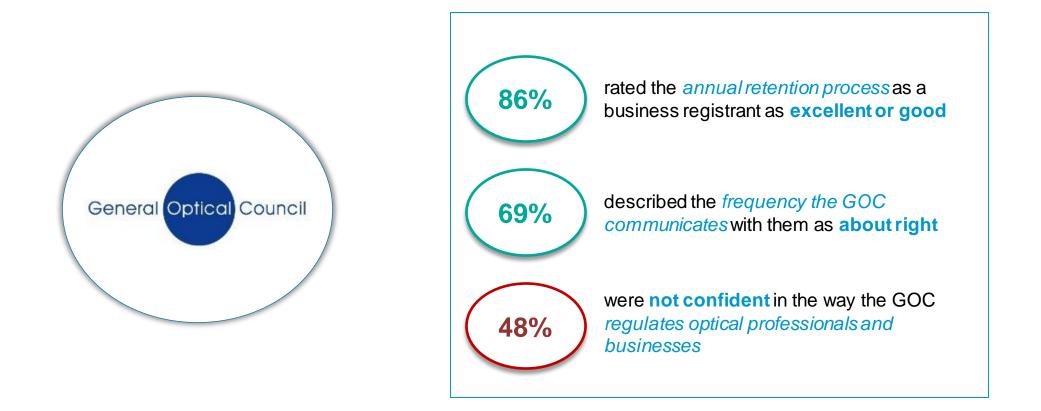
There was **some positivity** in regard to education, standards and EDI work, but **room for improvement** in ensuring registration fees are reasonable and communication about the FTP process.





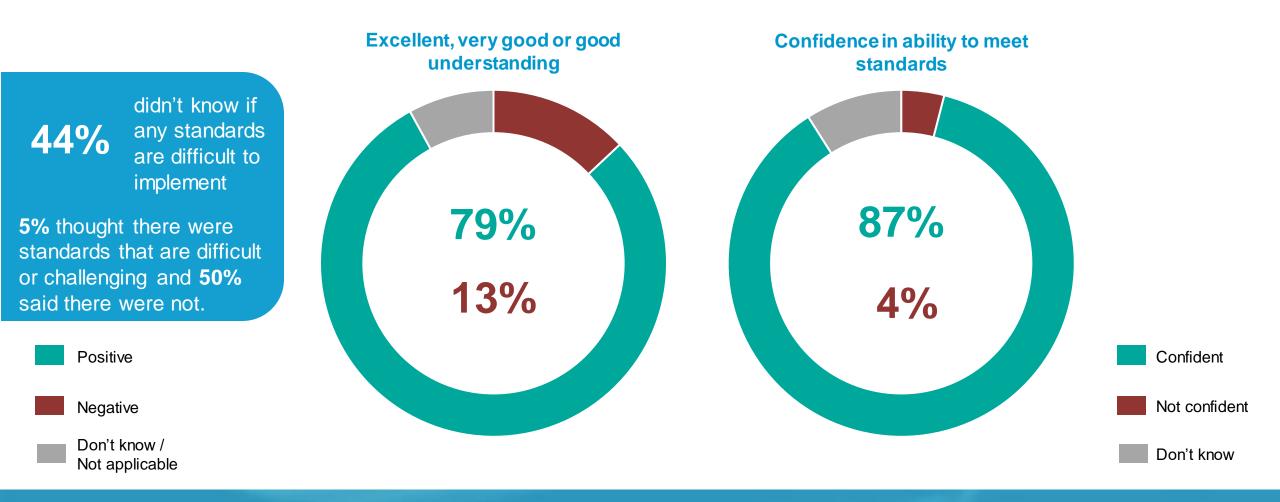
Regulation, registration and communication

There was widespread positivity towards GOC communication and the annual retention process. However, around half did not have confidence in the way the GOC regulates optical professionals and businesses.





The vast majority had a **positive understanding** of the Standards for Optical Businesses and had **confidence** in their ability to meet the standards.





'Speaking up: guidance for registrants'

A majority found the 'Speaking up: guidance for registrants' easy to understand and easy to implement, but sizeable proportions had not read it or were not familiar with it.



rated their understanding of the guidance as *excellent, very good* or good



had not read the guidance yet



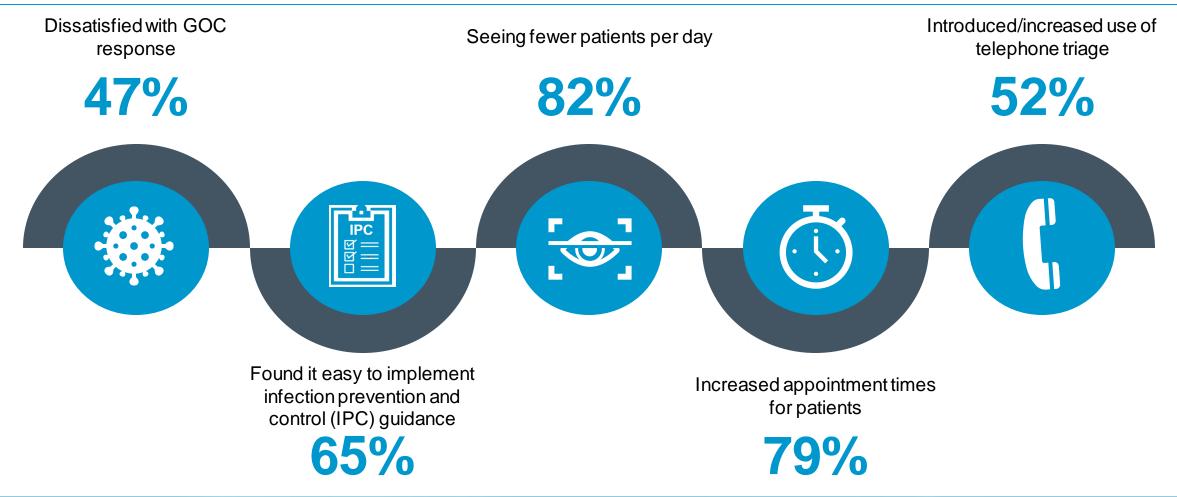
did not know if the guidance is easy or difficult to read

62%

found it easy to implement the 'Speaking up: guidance for registrants'

COVID-19 pandemic

Almost half were **dissatisfied with GOC's pandemic response**, whilst a majority found **IPC guidance easy to implement**. Majority of practices are seeing **fewer patients per day** and have **increased appointment times**.





Business challenges

What are the main challenges that your business faces? (Five most common)





Base: All (147)

Stakeholder interviews: Perceptions of GOC

Relationships with the GOC

Most stakeholders said they had a good relationship with the GOC, and felt engaged and listened to in meetings and consultations. Some said they found the GOC approachable and responsive, and a few said they had a 'critical friend' relationship based on mutual trust and understanding.

However, a few large employers said they felt their organisation's relationship with the GOC was **slightly limited** as they thought the GOC actively tried not to appear as too close to them for political reasons.

66

I think there is a lot of trust in the relationship. We trust them and they trust us. We have very open and honest discussions.

Patient/public group/organisation

I think we've got a very good working relationship with the GOC. Education and training provider

We have a really good working relationship with the GOC. They are able to attend our council meetings, which happen twice a year.

Professional/representative body

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There's definitely the perception from the GOC that they can't build relationships with, for example, the larger multiples because it might be seen that they are cosying up to them or treating them differently to maybe an independent or a small individual registrant.

Large employer



Positive perceptions of GOC performance

Most stakeholders said they were **generally favourable** towards the GOC as the regulator, held it in high regard and said they clearly understood its role in the sector and its function.

A few also compared the GOC **favourably** to other regulators in terms of its regulatory performance.

66

I have the highest regard for the work that they do.

Professional/representative body

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It's clear what its function is. It's clear about what it needs to achieve. It's got the balance right between how it engages with the sector and understanding the area it operates in.

Professional/representative body

66

As far as regulators go, they're probably amongst the better that we see in terms of their performance.



Positive perceptions of GOC performance

Many stakeholders thought that the GOC carried out its statutory role of protecting patients and the public effectively, through holding the optical profession to high standards, and a few felt this also protected the profession to an extent.

A few stakeholders felt that the GOC had the **'right touch'** in regard to regulation.

66

I think they do protect the public through the issuing of their standards, guidance and statements. I think they give a clear steer on the expectations of what they would expect a registrant to do in terms of clinical performance, but also behaviours and attitudes, morals and ethics.

Government/commissioner

It definitely feels as though it's about protecting the profession. I know from an outside perspective, the GOC talks about protecting the public and things like that, but I think the GOC does a very good job of holding the optometry profession to a high standard.

Large employer

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It is an effective healthcare regulator and protects well the patients within its ambit.



Perceptions of the GOC as an independent regulator

I think that if we didn't have the GOC and were reliant on the HCPC, we'd be in a far worse position because it would be 100 other people talking about 1,000 other things.

Patient/public group/organisation



I think eye care is better served by an independent regulator, such as the GOC, rather than being part of a large multi-regulator that might mean its voice is diminished.

Professional/representative body

Many stakeholders **did not want to see the GOC merged** with other regulators. They underlined the benefits of having an independent regulator in the sector, such as the GOC's experience, expertise and knowledge of the sector, which they felt would be lost if it was merged with a single regulator to the **detriment** of the profession and sector.

I think it's vital to have that independent regulator. I think it needs that separation.

"

All the other optical bodies, and I agree with them, are saying that they don't want the GOC to be with the hearing people and the chiropractors and all the rest, as things won't be done properly. I think the GOC should be independent dealing with the optical world because it is a slightly unusual setup.



Perceptions of leadership at the GOC

A few stakeholders highlighted that there had been some **staff changes** in the GOC over the last few years in senior positions, which they felt had sometimes led to a **lack of consistency** in decision making, direction and communication.

However, it was generally felt that leadership at the GOC was now stable, which was moving the organisation and the profession in the **right direction**.

66

We had loads and loads of different directors of education. They came and went very quickly, and they kept changing direction. Education and training provider

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I think the leadership team at the moment has got the right ideas, the right plans.

Patient/public group/organisation

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There was one stage about two years ago where it literally felt like musical chairs in terms of people coming and going, who were in this role for three months and then gone again. So, there was no structure that you could feel confident that they were going to move the profession forward, whereas now it does feel more stable.

Large employer



Perceptions of staff at the GOC

A few stakeholders held the perception that some staff at the GOC would benefit from a **deeper understanding** of the optical sector to be effective in their roles. These stakeholders suggested that **GOC staff could spend time in high street practices and in hospital settings** to observe how registrants work, as well as in educational settings.

66

I think too many people in the GOC don't really understand the world of optics, particularly at the medium to low level. Too many of them have never set foot in a practice, apart from when they get their eyes tested as a consumer, and that is quite evident in the way that some of them think and act.

Patient/public group/organisation

If I were the Chief Exec of the GOC, I would be trying to make arrangements for my staff to spend X number of days a year sitting in the corner of a practice, observing what goes on. It's as fundamental as that. It would really help their understanding.

Patient/public group/organisation

It would maybe help if the GOC themselves came to look at institutions, not to give us the once over, but so they actually see on the ground what happens rather than just reading about it thinking they know what happens.

Education and training provider



Perceived weaknesses

Whilst most stakeholders said they were favourable of the GOC, there were some **perceived weaknesses** and areas for improvement, such as:

- Defensiveness in the face of constructive criticism
- Too much influence from large multiples
- Not always listening to and acting on feedback from stakeholders
- Responsiveness to communication
- Insular working practices
- Limited input from patients and the public

We feel the GOC is inevitably quite influenced by the corporate sector in the commercial side of optics.

Patient/public group/organisation

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My worry is that when a report comes out and goes to council, it just engenders a lot of defensiveness because it's like, "Oh, everybody hates us, and we are feeling really defensive because we've been criticised".

Education and training provider

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The biggest weakness is it's relatively insular in what it does. I think there should be wider involvement.

Government/commissioner

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I have a lot of frustration with how the GOC collects data and then ignores it, or maybe just files it away as a box ticking exercise.

Education and training provider



Ways of describing the GOC

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I think there is something around rule driven. Ultimately of course they are the regulator. It's rule driven. **Bureaucratic** is probably the word.

Professional/representative body

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Agility and nimbleness. I think what drives it is that is they regulate a profession that's also a commercial industry.

Patient/public group/organisation

I have always found them accommodating and supportive.

Education and training provider

I think by and large the work they carry out is done in a **transparent** way.

Education and training provider

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The problem with the GOC is that it is **risk averse**, and it is not strategic.

Professional/representative body

66

I suppose **professional**. A **steady** pair of hands. **Responsible**. They take their responsibilities seriously. They make sure that things are dealt with appropriately and within the realms of what they can do. Large employer



They are **good communicators**. The level of engagement that they show is strong. Professional/representative body

66

I always considered them as a slightly somewhat **aloof** organisation in the sector, somewhat less approachable perhaps than everybody else we work with.

Government/commissioner

Perceptions of the Strategic Plan

Not all stakeholders were familiar with the GOC's Strategic Plan. Of those who were, there was some positivity with perceptions that its **mission was clear**, the priorities were the right ones, and the organisation was **meeting them**. However, some thought it was too early to tell in regard to performance, given the COVID-19 pandemic.

Some stakeholders criticised the GOC's **ability to plan ahead strategically** and horizon scan and thought that this was something the organisation could improve.

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I think they've set out a very clear mission, which is about high standards and protecting the public.

Professional/representative body

66

It's probably too early to say just because of the pandemic. Professional/representative body

66

They don't horizon scan enough. The world is evolving within the optical industry and regulation needs to evolve to meet that.

Large employer



Stakeholder interviews: Perceptions of GOC functions

Perceptions of the register and website

Some stakeholders mentioned the GOC **register**, praising its functionality and ease of use.

A few stakeholders had noticed the GOC's new look **website** recently and said it was much **better looking** and **easier to use** than before.

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If somebody applies to work for me, I can pop onto the website and in two minutes know that they are a registrant, no matter where they are working.

Professional/representative body

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I think they've got a new website recently. Their old website was pretty horrible to look at if I'm honest. The new website is much better. Modern and more user friendly.



Perceptions of the fitness to practise process

Many stakeholders thought that the fitness to practise process had **recently improved**, with a reduction in the time it takes to resolve cases and the clearing of a backlog. Some also had noticed that only the more serious cases now went to fitness to practise, with other cases being dealt with by local complaints systems or by the OCCS.

However, some stakeholders still felt there was **some way to go** to reduce the time it takes to resolve cases, given the impact it can have for registrants and for patients involved. The process is definitely improving. It's definitely speeding up, I think. Large employer

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The fitness to practise process has got a bit better. I think it could still be done quicker, where you are not leaving people in situations where they will have a lot of stress and worry.

Professional/representative body

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It's more timely, greater transparency, better management of expectations. It's very difficult to get into individual matters and cases, and how they're handled and so forth, but if you go back 10 years the atmosphere was more like, "They're out to get you". I think it feels more like now they're trying to exercise a fair judgmental process.



GOC education and training provider visits

Some education and training provider stakeholders felt that GOC visits used to be time consuming and stressful. However, they highlighted that the format of visits had changed recently, as had the way the GOC communicates with them, and in some cases the GOC had shown **flexibility** as to how visits are carried out.

A few thought that GOC visits were still challenging, as there were **communication issues**, **time delays** with receiving reports, and **demands** following visits could sometimes be unreasonable in nature and timing. What was less easy was the preparation for the visit because the GOC is just so slow in communicating with us. Education and training provider

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It's definitely improved. Back in the early days of my tenure as an academic, the relationship between the GOC and universities was a bit more formal and a bit less friendly.

Education and training provider

66

They were very flexible when it came to the visit. The visit was well organised and I, due to some ill health, had to delay the submission of material that I needed to submit, and they were forgiving. They were flexible and reasonable, that was positive.

Education and training provider

When we have our audits from time to time, it does seem to be a very long time before we get the actual reports back from the GOC.

Education and training provider



Perceptions of the ESR

There were **mixed views** about the ESR, with some thinking it was an achievement as it would have a **positive impact** in the sector and the many vested interests in the sector had been managed well. Others thought there were still **issues to iron out**, that it could have a **negative impact** for education and training providers, and elements of it were **rushed**.

A few also thought the GOC had **not clearly communicated** the rationale for the ESR or shown clear evidence as to its necessity.

"

The whole thing was an exhausting three years, and then with COVID happening as well, and we are trying to change our delivery, keep our students safe and progressing, keep our patients safe and still able to help the students learn. That, on top of everything else, was not needed to be pushed through so quickly.

Education and training provider

The rationale [for the ESR] was never clearly and sensibly articulated in my mind. Education and training provider

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"

It's ultimately going to be a positive thing that produces optometrists that are fit for purpose, so it will be benefit. Large employer The way that they have run the educational review was impressive because there were so many vested interests and I think at the end, most people, if not happy, can live with the outcome. That's quite a triumph.



Perceptions of the ESR

A few stakeholders held the perception that at various points the GOC had not taken stakeholder feedback about the ESR on board, with some describing the consultation process as a '**box-ticking exercise**'.

A few also felt that the GOC had not sought viewpoints **early enough** in the process, which would have positively resolved some issues which had later emerged.

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I think there was an opportunity to perhaps resolve some issues early on and I think that opportunity was missed.

Education and training provider

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We have engaged regularly on the education piece and the Strategic Review. We were not particularly comfortable about the way it was conducted. Any alternative view or dissenting voice was treated as an irritation or annoyance rather than being taken seriously.

Professional/representative body

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They announced, "We want to change things", and there was no hint of any consultation first before deciding that they wanted to change things.

Education and training provider



Perceptions of CPD

Some stakeholders felt that the recent implementation of CPD to replace CET had been an **achievement** and would have a **positive impact** in the sector.

However, others perceived that there had been **issues** with delays to communication about the changes and guidance, and there had been a few technical issues.

66

We really appreciate the move from CET to CPD. I think it's a significant step, but it's only a step on the eventual path. So, they are doing their bit to change the culture in the sector of how people professionally develop.

Professional/representative body

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The new CPD rules against CET, they were very late to the table with further guidance. Now, they had all sorts of issues. There were tech issues.

Professional/representative body

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They've also done well with the move from CET to CPD. We were one of the last sectors to have CPD. Professional/representative body



Stakeholder interviews: Communication and engagement

Perceptions of GOC communication and engagement

Many stakeholders said there had been a marked improvement in the way the GOC communicates and engages with its stakeholders over the last few years, with some saying the organisation had become more approachable and transparent, which was changing perceptions of it.

Some stakeholders said that communication and engagement had **particularly improved during the pandemic** and had led to more meetings and better engagement. I think their engagement has been better. Certainly, through the pandemic these regular meetings have been really helpful.

Government/commissioner

That was just one of the really great things to come out of COVID I think, that willingness to engage.

Professional/representative body

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They're changing and changing in the right way in terms of becoming more of a friendly face.

Education and training provider

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I think their communication is good. It wasn't always so, but it is now I think, where they generally look to interact with stakeholders in a positive and productive way. Professional/representative body

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Perceptions of GOC communication and engagement

A few stakeholders said they received **too much communication** from the GOC, which sometimes meant some things went unread. These stakeholders felt that communication from the GOC needed to be important, relevant and stand out so it was not missed.

A few also thought the GOC should carefully consider the most **appropriate methods and times** for announcements and to ensure stakeholders are given time to prepare when they are required to implement something.

66

I don't think they want to overdo the communication. I think when you receive something from the GOC, it should probably stand out.

Professional/representative body

I feel like I've had a lot of communication from them in the last 24 months. It's almost like there is too much to respond to sometimes.

Professional/representative body

Thinking about when they are releasing something and how they are releasing it. I think when things are released on social media prior to them being released in a formal email, that's probably not the best, most appropriate method.



Perceptions of GOC communication and engagement

However, some stakeholders thought that communication could be improved, with a few saying that responsiveness had become worse since the start of the pandemic perhaps, in part, due to some GOC staff working from home.

Some stakeholders explained that they did **not have named contacts** within GOC departments and had to use shared email addresses for communication, whereas those with named contacts generally felt communication was good. They have been slow since COVID, but then again, I think it's impacted any large or moderately sized institution.

Education and training provider

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I think they aren't as responsive as they should be and that's something that they need to address.

Professional/representative body

66

Sometimes when you phone, people don't answer the phone, or they don't put you in touch with the right person. I don't know if that's a downside to COVID because they've maybe had people working from home and it meant that it took a while for them to get back to you.

Professional/representative body

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There are none of them back in the office yet. Come on guys, the world is heading back to normal. There's no excuse.

Patient/public group/organisation



Stakeholder interviews: Pandemic response

Many stakeholders were positive about the GOC's pandemic response, saying that the GOC had been **supportive** of stakeholders and engaged with them in the right way through showing **flexibility** in easing rules and regulations. They felt this had allowed businesses to continue with online sales and virtual consultations and had allowed education and training providers to move activities online.

66

I think they have been responsive and supportive to the different challenges from an HEI perspective. I think from a practice perspective, looking at the support that I think they have given practitioners in terms of operating in a really challenging environment, I think that they've done well to pivot quickly.

Education and training provider

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I think in general they did well. The key was the easements they put in place. Things like being to deal remotely with certain situations and more leeway with taking out face to face interactions with patients where it wasn't clinically necessary. The easements they have put in place have worked very well.

Professional/representative body

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Through COVID, the easements that they delivered. Many of them were very good. They helped patients, registrants and business registrants alike, so that was definitely a strength that they mobilised quite quickly, and they looked at how they can make things easier for everybody.

Large employer



However, some stakeholders thought that GOC's **initial response to the pandemic was slow**, with initial delays to the release of advice and publishing the COVID statements. A few also felt that the GOC could have lobbied the government more to class optometrists and dispensing opticians as **key workers** so they could continue to see patients in practices.

66

It took them a while to get the advice and the statements out on what people needed to do when we first went into it in March 2020. It was an incredibly difficult time, but people were looking for answers and regulators should have probably been one of the points that those answers should have come from.

Professional/representative body

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I don't think that there was a clear enough and fast enough interaction with government over where opticians and delivery of clinical services should be positioned. And perhaps this is symptomatic of the fact that for some it was about whether their shop was open or not.



Some stakeholders thought the GOC had worked well with other optical sector bodies such as The College of Optometrists and other regulators as well to ensure there was a consistency in communication and guidance.

However, others felt other bodies such as the College had taken the lead in the sector's pandemic response, and a few said they were confused by which body did what in the early days of the pandemic. They worked with other bodies to try to make sure that the message that went out was consistent.

Education and training provider

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I think maybe if one were to raise a criticism, it was maybe a bit slow. The College of Optometrists really took the lead. You might argue that maybe they should have because that is part of their role, but bear in mind that the role of the regulator is to protect the public and ensure that there is safe care in place.

Professional/representative body

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Between the College, the AOP and the GOC, I can't remember who did what. I can't remember if it was the GOC who made sure we were getting PPE at the beginning or whether it was the College or the AOP.

Patient/public group/organisation



A few employers felt that the **transitioning out of emergency COVID measures** and easements had, at times, **not been wellhandled** by the GOC. There were reports of businesses being given just a few working hours' notice to implement changes to practice, which was impractical, and there was some uncertainty when expiration dates passed with no new direction given.

"

A lot of the policies that the GOC had, they had expiration dates and then they never got renewed on those dates. If they are putting at the end of the policy that it this is in place until this day, make sure it's updated on time because it creates confusion if it's not been updated.

Large employer

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The weakness was how they removed the easements. There were times when they were removing easements that would affect hundreds of thousands of customers across the UK and they were planning on doing it with two hours' notice, which is just completely unrealistic.

Large employer



Stakeholder interviews: Challenges in the sector

Technology in eye care

Stakeholders listed many technological advancements that were already reality or on the horizon, such as contact lens technology, auto-refraction, online consultations and telehealth, and new business models. These technological advances were generally felt to be beneficial to patients and practitioners, but it was suggested that the GOC needed to be one step ahead to ensure technology and new business models are appropriately regulated. For example, some **issues were highlighted**, such as where responsibility lies if something goes wrong.

66

I think looking at technology, AI remote technology, and make sure that we close any loopholes or it's very clear so that people can make sure they operate in the right way.

Large employer

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I think it's really exciting, the advancement that technology can bring in supporting practitioners to do their job better. It's tricky because if you get a machine to do something which originally a practitioner was doing, then perhaps it is more difficult to regulate.

Government/commissioner

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With regards to artificial intelligence etc., they need to be on the front foot and ensure that they have a clear position on how that is used to deliver eye healthcare.



Regulation challenges

Many stakeholders felt that online sellers of lenses and spectacles based overseas were a challenge in the sector. Some accepted that the GOC was not able to regulate sellers based outside of the UK, whereas others thought that the GOC's remit should be expanded to regulate that market, given its function is to protect patients and the public in the UK.

A few also cited '**ready readers**' being sold on the high street and thought the GOC should ensure that sellers include **disclaimers** about the importance of eye health checks.

66

There needs to be more of a handle of online sales of things like contact lenses and online spectacles that you sometimes see through Amazon marketplace. That is the duty of the GOC. It is a difficult one because obviously these are overseas companies that are selling stuff into the UK, but even still, with contact lenses there is a lot of danger of infection and things like that.

Education and training provider

"

I've complained a number of times to the GOC about online sellers. I'm sure they have investigated to some degree, but they are very quick to shift responsibility for doing anything. I'm sure it's partly that they don't have the legal powers to follow it through, but they should be agitating for that to change. There is a clear problem there.

Professional/representative body

When ready readers are being sold in Marks and Spencer, say, it would be good if the GOC insisted that they had a notice beside talking about the importance of an eye health check at an optometry practice.



NHS GOS contract

A few stakeholders thought that there were issues with the NHS General Ophthalmic Services (GOS) contract. One perceived impact was that some practices were no longer providing GOS services because it was not financially viable. Others thought that the contract required review given the changing scope of practice for optometrists and dispensing opticians, and that the GOC would play an important role in the review.

Something I keep hearing about is practices giving up on GOS and going fully private. Patient/public group/organisation

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We have got a programme of work that is looking at the transformation of outpatients, particularly for eye care services. GOS is long due a review. I think it's back in the eighties the last time the contract was actually reviewed, and things have moved on quite a lot in that period of time.

Government/commissioner

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If we were forming a working group to look at any review of GOS, I think we would want them as a stakeholder. I don't know how much contribution they feel they would have to make, but I think it will be important.

Government/commissioner

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It's been difficult to negotiate additional services for the NHS because people are unhappy with the basic contract. Optometrists say they make a loss on the NHS contract and so they are reluctant to take on more work until this contract is sorted out.

Patient/public group/organisation



Ability of students and variability in standards

A few stakeholders said that they worried about the **ability of students** studying optometry, which they thought was leading to a decline in standards amongst newly qualified practitioners.

Another stakeholder felt that there was already a **variability in standards** between registrants, which could have negative implications for patients.

We would say the quality of newly qualified optometrists isn't as good as it needs to be. There is a lack of a number of things. Everyday common sense seems to be lacking in so many ways.

"

Professional/representative body

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There's certainly been a move towards more and more optometry students graduating. Whilst there is an increasing number of patients, and elderly patients in particular, it has had an impact on salaries. That then has a knock-on effect on the calibre of applicant that comes in wanting to do optometry. It's been a real challenge from an education point of view. It's been a slow creep to teach to the right standard, but with less ability on the part of the entrants coming in. Education and training provider

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What we know is that there is a great deal of variability in the quality of optical practice.

Patient/public group/organisation



Disparity in eye care across the UK

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There are going to be differences across the UK. We've seen them for some time, but they are getting more and more marked, particularly with the devolved nations, but equally regions in England.

Professional/representative body

A few stakeholders felt that there was disparity in the way that eye care is delivered in different parts of the UK, with different ways of delivery in Wales and Scotland to England. This led some stakeholders to believe that skills needed to work in different parts of the UK are becoming more divergent and GOC standards might need to reflect these differences in the future.

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I think in general terms, we're seeing increasing disparity between the way that eye care is delivered in different parts of the UK. We're very fortunate in Scotland that we have been able to move ahead in that regard over the last 15 years, whereas the rest of the UK has been lagging somewhat behind, particularly England.

Education and training provider

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I think this is one of things from the ESR that we were very disappointed with, in that actually our standards have to come down. If we look at this from a UK perspective, it's the lowest common denominator that effectively wins out here. And actually, our standards are improving and increasing all the time and we would expect regulation to back that up, but unfortunately it doesn't. This difference in the four nations is not going to be easy to manage as we go forward.

Government/commissioner



Workforce challenges

Many stakeholders mentioned workforce challenges across the UK. There was a perception that more and more optometrists were undertaking **locum work or working part-time**, coupled with many not wanting to move to different areas (particularly those where there are no HEIs offering optometry courses). It was felt this presented a **risk to the public**, as in some places in the country there is a shortage of optometrists in particular.

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I suppose there is a workforce problem. There's a shortage of optometrists, particularly in certain parts of the country, and part of it is driven by the fact that so many optometrists are now working part-time or working as locums or not working full-time. That's because of lifestyle etc.

Professional/representative body

Heavy concentration of optometrists in Manchester, Birmingham, London in certain pockets, but then there is extreme poverty of resource in others, which then means there are people who capitalise on that, become self-employed and will travel around these locations to try and drive their own day rate.

Large employer

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We hear there are certain parts of Scotland where they can't place people. There have been vacancies for extended periods of time. I think that's a challenge across probably the whole of the UK.

Education and training provider



Workforce challenges

Some stakeholders held the perception that there were **too many locums** in the workforce and, due to the workforce shortages in some areas of the country, the need to employ them were negatively impacting business costs.

A few felt that newly qualified optometrists carrying out locum work when they are inexperienced is a potential **risk to patients** because they are unable to learn effectively from their practice.

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If you locum, you do a day here and a day there and that's it, if you see a patient this Monday and make a decision on them, the likelihood is that you never see them again. However, if you did see them the following Monday, you would know whether that was the right decision or the wrong decision, and you learn from it. If you see somebody today and see them again next year, again you learn from that consistency, and they can tell you if it worked or didn't work. So, this idea that a whole load of newly qualified 22-23 year olds just want to go out and locum because they are in control and it probably pays them 30% more, I think from the public point of view is unsafe.

Professional/representative body

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Locums can charge whatever they like unfortunately. It's tricky. We're looking at around 30% of our clinics being run on locums at the moment and I'd say that's probably similar across larger multiples. We're all in the same boat. We are all fighting for the same pool of people.

Large employer



Ophthalmology outpatient waiting lists

Many stakeholders highlighted the **long waiting lists** in ophthalmology outpatients and that optometrists were going to be increasingly relied upon to treat more patients in **primary care settings** where appropriate to ease problems through the NHS recovery and transformation programme.

Some felt that seeing increased numbers of patients with eye health problems would **increase risk** in the profession and the GOC will play a key role to ensure that the profession has the **right skills** to the meet the challenges.

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Ophthalmology has the biggest number of outpatients in the whole of the NHS, and it can't cope. Even before the pandemic it was acknowledged that people were going blind simply because of delays in hospital. There's so much of the hospital work that can be done in the community with the appropriate skills.

Professional/representative body

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We hear from primary care clinicians that they can do an awful lot more within the primary care setting. We equally hear from protective secondary clinicians that primary care clinicians haven't got the skills and capabilities to do that work. It would be really good from the overall regulator to get a true understanding of what is within and out of scope for clinicians.

Government/commissioner

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Eye care in general, we're struggling with waiting lists. Waiting lists in secondary care were bad before the pandemic. They are even worse now. We've got to do things differently across eye care. Not just what we are doing in hospitals, but in the community as well. Government/commissioner



Number of optical bodies in the sector

Quite a few stakeholders highlighted how the optical sector was crowded, with many professional bodies who each had their own agenda, which was leading to an increasingly fragmented and polarised sector. It was felt by these stakeholders that it was a challenge for the GOC to engage and work with all these bodies to address challenges in the sector.

66

The number of different interests presented by the optical bodies is bizarre compared to any other profession or industry I've come across...It's ridiculously crowded, and the trouble is that all those organisations have their own lives and their own secretariat and their own patch to defend.

Professional/representative body

The sector is increasingly polarised, I think, and fragmented. Government/commissioner

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The sector is too crowded anyway and the organisations that aren't clear about what they are looking to achieve tend to then start treading on other people's toes, and it all gets a bit messy.

Professional/representative body

There are lots of bodies and working together can be a challenge.

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Stakeholder interviews: Priorities for the GOC

Call for evidence on the Opticians Act

Many stakeholders mentioned the GOC's current call for evidence on the Opticians Act, which many thought was **out of date** given technology and the changing scope of practice. However, opinion was split as to the nature of changes necessary, with some thinking large scale changes were required, and others that large scale changes could have **unintended consequences**.

Many felt the review of the Act should be a **priority for the GOC** over the next few years and hoped the GOC would **listen carefully** to feedback and take it on board.

We believe the Opticians Act needs a ground up review. Professional/representative body

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The Opticians Act needs to be updated and accommodating where we are now at in the 21st century in optometric practice.

Professional/representative body

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I know there is the call to evidence that's going to happen on what changes may or may not be appropriate for the Act. I'm very nervous about unintended consequences with that. I think it would be very easy to remove some of the protections because we don't think they are necessary, when that may lead to a worse outcome for patients.

Professional/representative body

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They'll take out one comment about the Opticians Act being out of date and that will be their banner line. I suppose I don't have much confidence in what they'll do with that consultation, and I worry about the unintended consequences of some form of deregulation of the eye test.

Education and training provider



Addressing workforce challenges

It was noted by the majority of stakeholders that, whilst the GOC needed to be aware of the workforce issues and contribute towards research into them, there were **limitations to what the GOC can do within its scope as the regulator**. Instead, it was widely felt that addressing the workforce issues was a **sector wide challenge** and the GOC's role was more to support other stakeholders. The GOC doesn't have a remit around manpower, which I understand, but actually it's the thing that keeps dogging the profession. We just never seem to get an appropriate level of resources.

"

Patient/public group/organisation

I'd like them to focus on workforce to some extent. It's not in their remit at the moment, but I'd like to see more of an active role in monitoring the size and scope of the workforce. They don't have the ability to do that at the moment.

Professional/representative body

One thing we've always struggled, I think, to get a handle on is information about workforce planning. That kind of data seems to be difficult to get for optometry. That seems to be more visible for other healthcare professions. I don't know whether the GOC perhaps have a role in that.

Education and training provider



Changing scope of practice

A few stakeholders thought looking ahead at how the clinical scope of practice is changing and ensuring registrants are **appropriately equipped** should be a priority for the GOC, but another stakeholder said they could not see how the GOC as a regulator could have much of an impact. The GOC's role is to make sure that the provision of eye care in the primary care setting is done safely and credibly.

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Professional/representative body

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In terms of how the GOC can become more involved as a regulatory body, it's difficult to see how they could make more of an impact for secondary eye care.

Education and training provider

I think [the GOC] will need to be looking at the clinical scope of clinical practice changing. Ten years ago, if you went for your eye examination and glasses, that's kind of what they did. Now, they could be doing macular injections in secondary care, and they could certainly be doing enhanced care around glaucoma monitoring and management etc.

Government/commissioner



Engaging with the public and promoting eye health

A few stakeholders held the perception that the GOC could **involve patients more** in its activities and raise its public profile, as many are unaware of the GOC and how it protects them.

There was also a perception that many patients are unaware of the different roles within eye care, which could be a barrier to accessing care, particularly for some minority groups. It was suggested that the GOC could play a role in **promoting eye health** and **educating the public** about the sector.

"

If you go down the pub and say, "Do you know what the difference is between an ophthalmologist, an optometrist, a dispensing optician and an optician assistant?", nobody's got a Scooby Doo. "Isn't that Specsavers?" they say.

Professional/representative body

It feels like the GOC maybe needs to get a bit more public input, rather than sector input, which is quite commercial and business driven.

Patient/public group/organisation

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They should be better at promoting eye health to the general population.

Professional/representative body

66

[The GOC should be] educating consumers as to what optometry is, how it works and what it delivers them.



Focus on supporting, communicating and engaging with stakeholders

Several stakeholders thought the GOC should focus on further **supporting, communicating and engaging** with stakeholders and the sector, whilst improving its responsiveness. They felt that this would foster relationships which would **benefit the sector**.

Some also suggested that the GOC should focus on **raising its profile** in the sector and **building confidence** in its ability to regulate amongst registrants and other stakeholders, which would ultimately benefit patients.

66

Communication, that should be the easiest win in some ways. They've been doing a lot of engagement and you can see that, but making sure it continues and is consistent, and improved.

Large employer

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I think they need to build their confidence back up again with the profession. I think there's a lot of people who work in the optical sector who have lost confidence, I would say, with the GOC for many different reasons, but it's the GOC putting up that united front – "We're here for you as a profession, we're not against you". I think that's what some people think of the GOC, that they are against us.

"

I feel it's the GOC, the clinicians and the professional bodies that need to agree and work together to ensure that whatever is delivered in the future, is the best eye care that can be delivered for patients. Professional/representative body Large employer



Business registrant survey: Detailed findings

Strategic plan: delivering world-class regulatory practice

Similar proportions agreed and disagreed that the GOC is *delivering world-class regulatory practice*, whilst around a fifth did not know.

To what extent do you agree or disagree that the GOC is...delivering world-class regulatory practice? Strongly agree 4% 40% Agree 36% In comparison... Disagree 27% 58% Strongly disagree 16% of individual registrants agreed¹ Don't know 18%

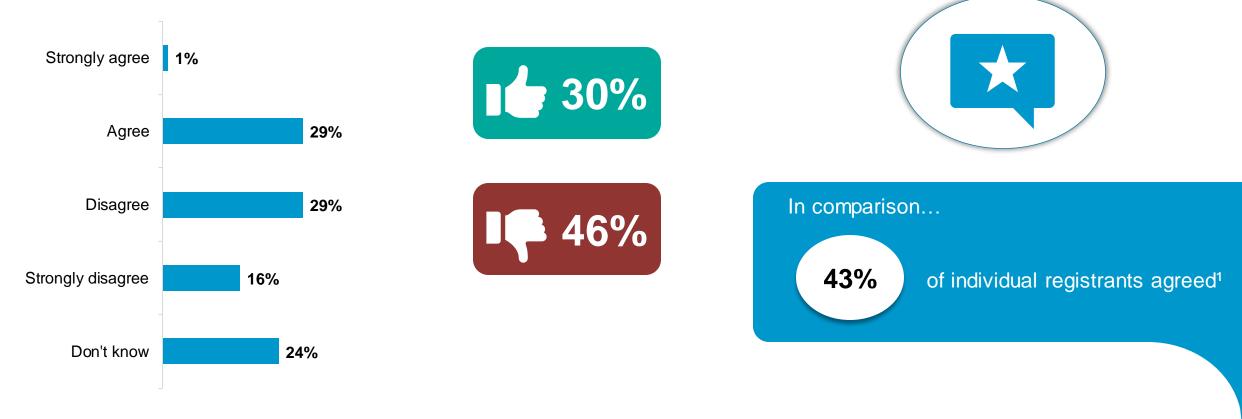


¹ GOC Registrant Workforce and Perceptions Survey 2022 conducted by Enventure Research

Strategic plan: transforming customer service

A larger proportion disagreed that the GOC is *transforming customer service* than agreed, whilst around a quarter did not know.

To what extent do you agree or disagree that the GOC is...transforming customer service?



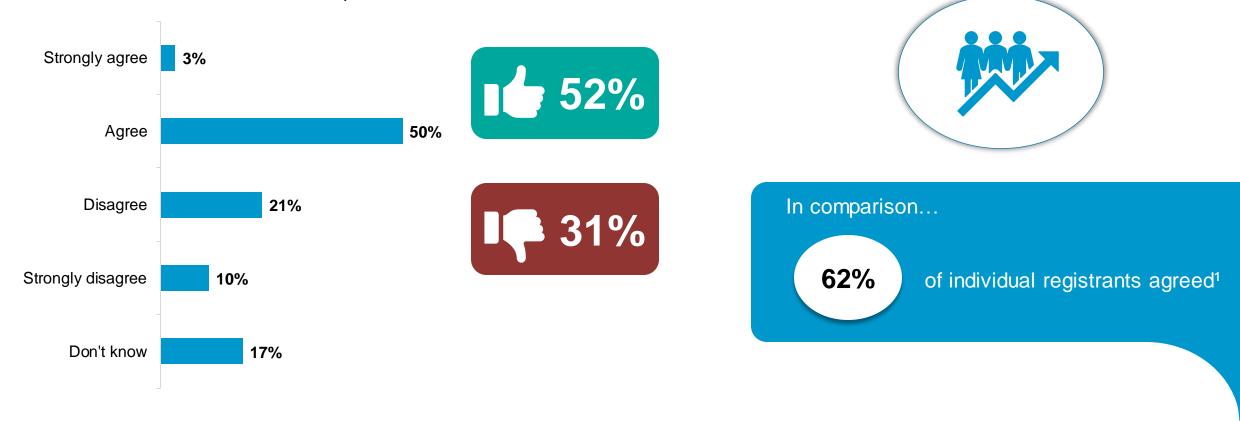


¹ GOC Registrant Workforce and Perceptions Survey 2022 conducted by Enventure Research

Strategic plan: building culture of continuous improvement

A larger proportion agreed that the GOC is *building a culture of continuous improvement* than disagreed, whilst just under a fifth did not know.

To what extent do you agree or disagree that the GOC is...building a culture of continuous improvement?

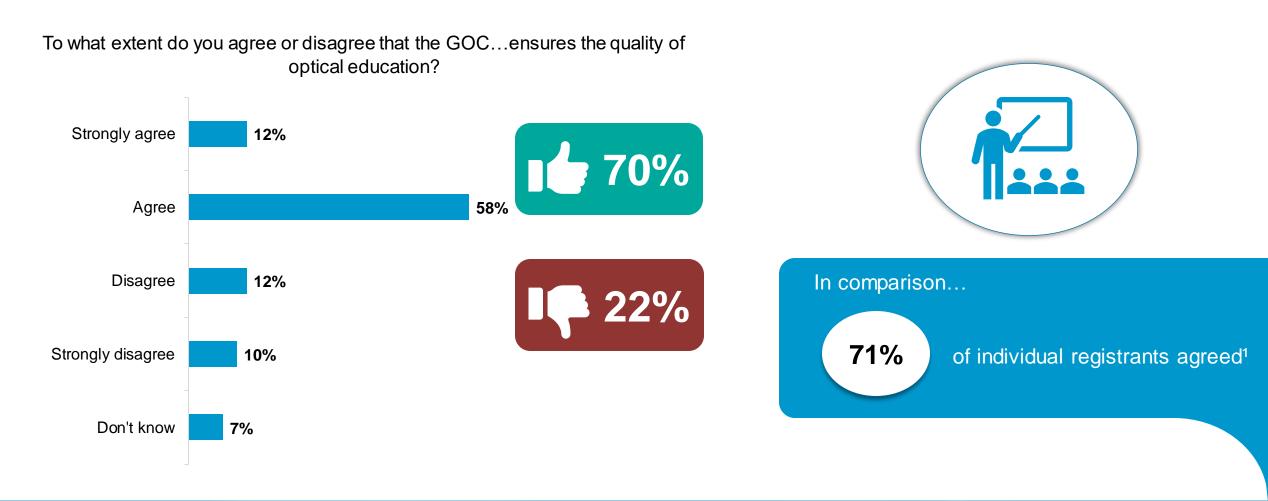




¹ GOC Registrant Workforce and Perceptions Survey 2022 conducted by Enventure Research

Ensuring the quality of optical education

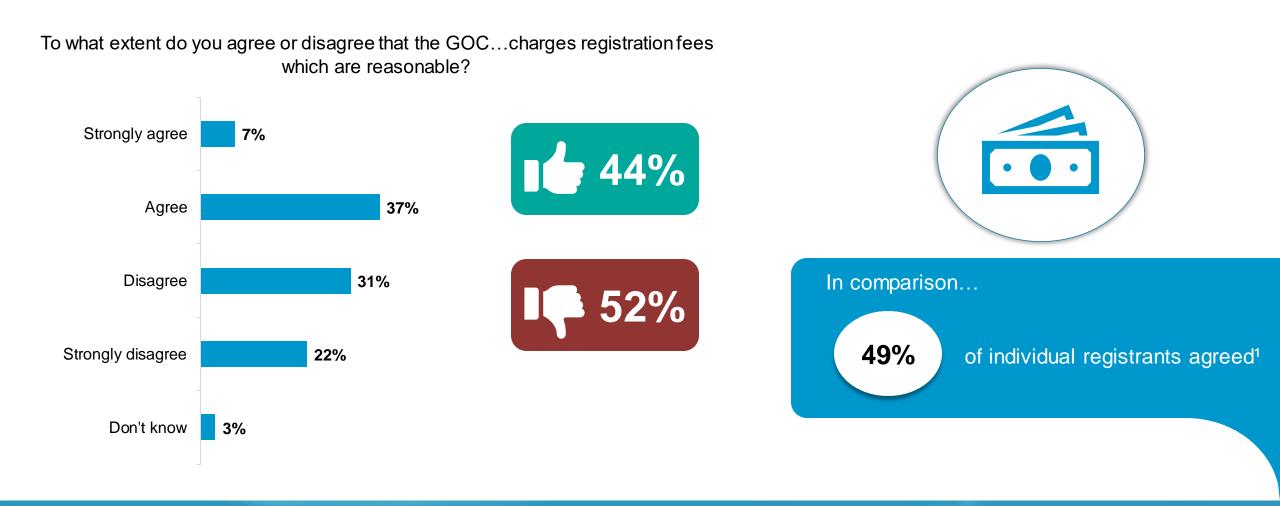
A much larger proportion agreed that the GOC ensures the quality of optical education than disagreed.





Registration fees

A larger proportion disagreed that the GOC charges registration fees which are reasonable than agreed.





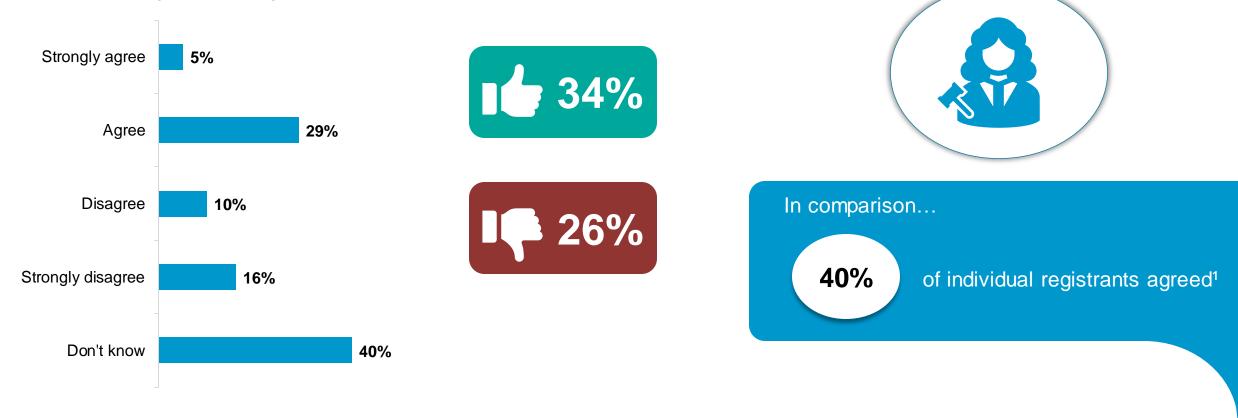
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Fairness in fitness to practise process

A slightly larger proportion agreed that the GOC is fair to registrants when taking action through the fitness to practise process than disagreed, but four in ten did not know.

To what extent do you agree or disagree that the GOC...is fair to registrants when taking action through the fitness to practise process?

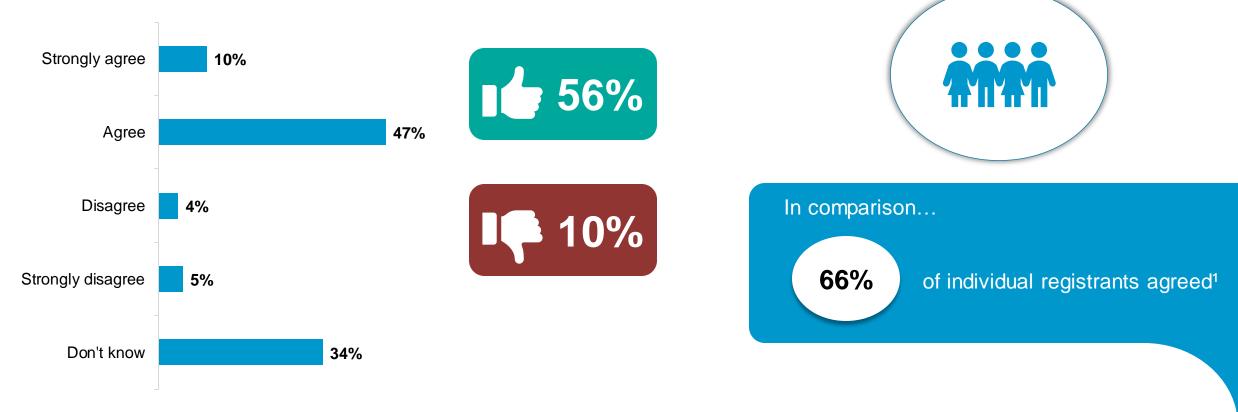




Equality, diversity and inclusion in GOC work

A much larger proportion agreed that the GOC promotes equality, diversity and inclusion in its work than disagreed, but a third did not know.

To what extent do you agree or disagree that the GOC...promotes equality, diversity and inclusion in its work?

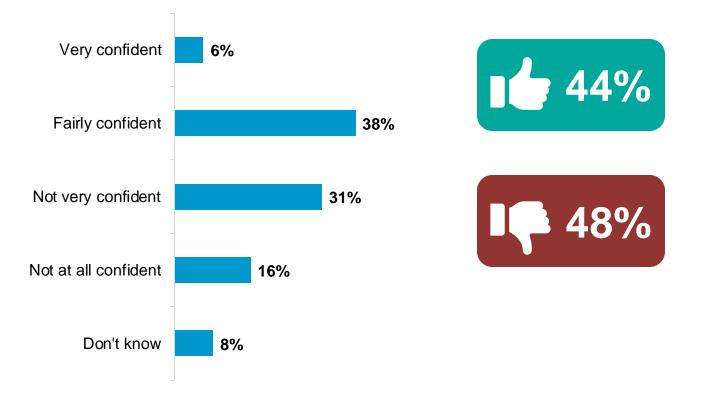




Confidence in regulation

A larger proportion said they were not confident in the way that optical professionals and businesses are regulated by the GOC than were confident.

How confident, if at all, are you in the way that optical professionals and businesses are regulated by the GOC?



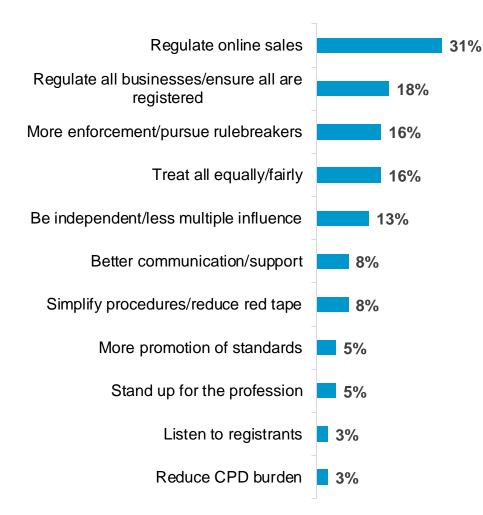
When asked to explain their response, the most common themes were:

- Inconsistent/unfair regulation (23%)
- Poor regulation of online sales (22%)
- Too much influence from large multiples (21%)
- Good regulation/clear standards (17%)
- Not all businesses are registered (13%)



Ways to improve regulation

What one thing can the GOC do to improve the way it regulates optical businesses?



When asked what one thing the GOC could do to improve the way it regulates optical businesses, **regulating online sales** was most common, followed by **ensuring all businesses are registered and/or regulated**. These were common themes noted in the stakeholder interviews too.

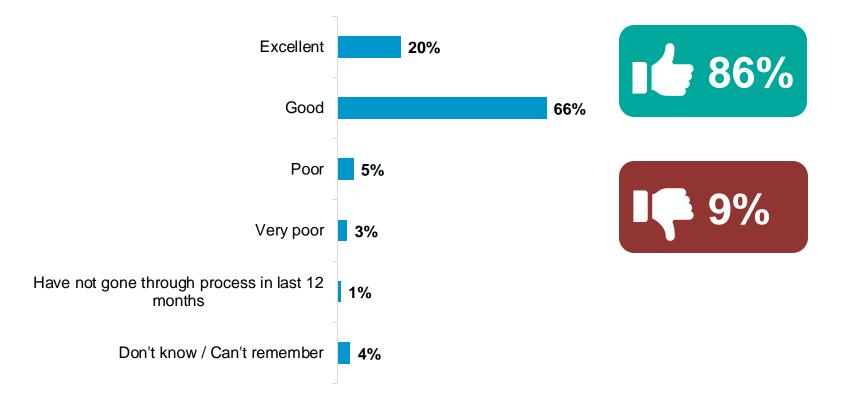


Base: Those who gave an answer (90)

Registration process

A much larger proportion had a positive experience of the annual retention process in the last 12 months than negative.

If you have gone through the annual retention process as a business registrant (i.e. applying and paying the fee) in the last 12 months, how would you rate your experience?

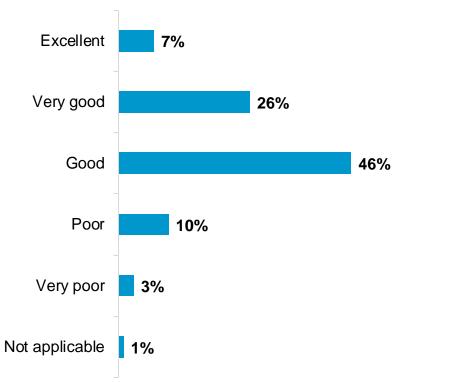


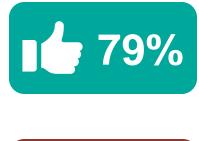


Understanding of Standards for Optical Businesses

A much larger proportion had a positive understanding of the Standards for Optical Businesses, than negative.

How would you rate your understanding of the Standards for Optical Businesses?





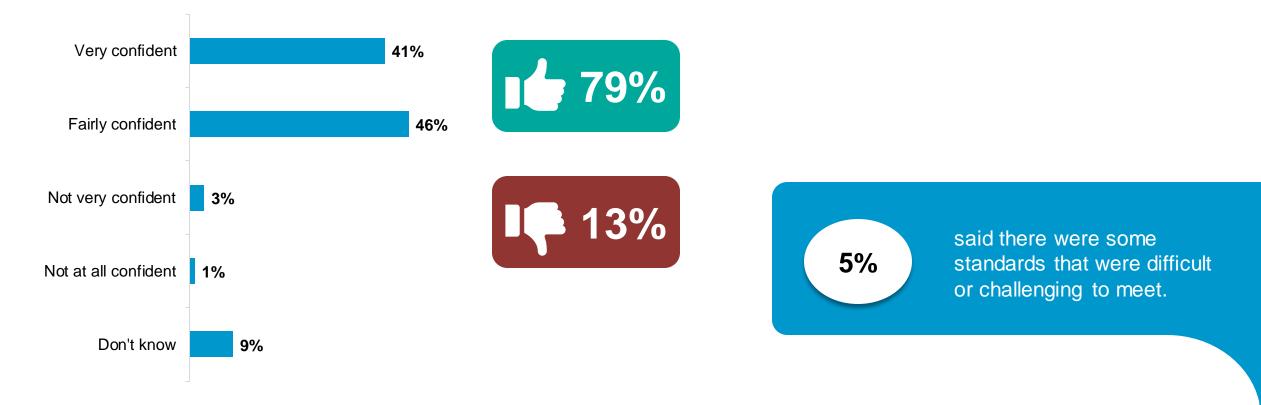




Meeting and implementing the Standards for Optical Businesses

A much larger proportion was confident in their ability to meet the Standards for Optical Businesses than not confident.

How confident are you in your ability to meet the Standards for Optical Businesses?





Understanding of the 'Speaking up: guidance for registrants'

A much larger proportion had a positive understanding of the 'Speaking up: guidance for registrants' than a negative understanding, but around a fifth had not read the guidance yet.

How would you rate your understanding of the 'Speaking up: guidance for registrants' published in October 2021? Excellent 6% 62% Very good 16% Good 39% In comparison... Poor 9% of individual registrants had a Very poor positive understanding and 24% 53% had not yet read it¹ Haven't read the guidance yet 22% Not aware of it 7%

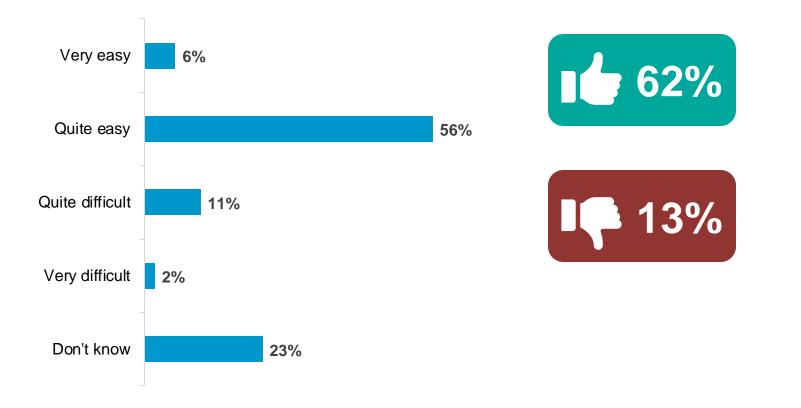
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¹ GOC Registrant Workforce and Perceptions Survey 2022 conducted by Enventure Research

Implementing the 'Speaking up: guidance for registrants'

A much larger proportion found implementation of the guidance easy than difficult, but around a quarter did not know.

How easy or difficult is it to implement the 'Speaking up: guidance for registrants'?



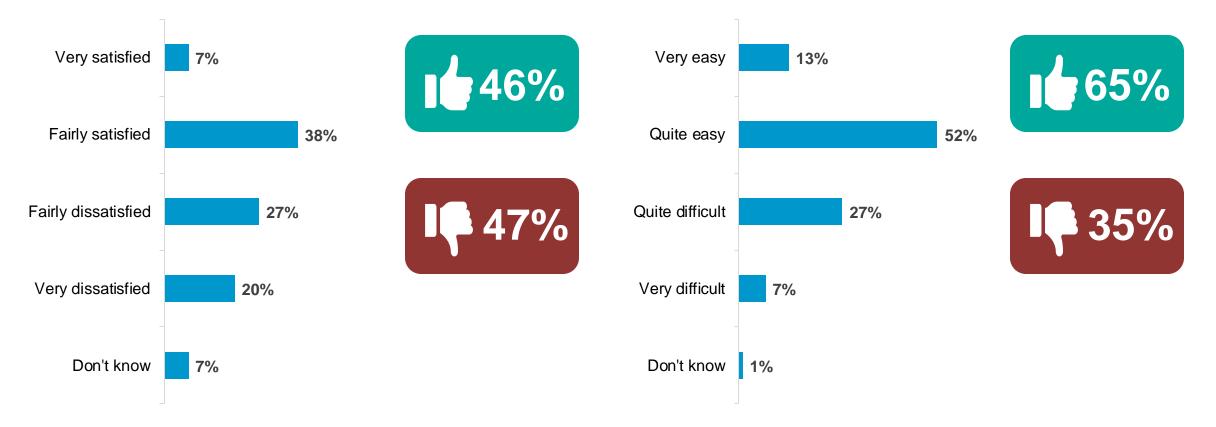


COVID-19 pandemic

Similar proportions were satisfied and dissatisfied with the response of the GOC to the COVID-19 pandemic and a larger proportion found implementing IPC guidance easy than difficult.

Overall, how satisfied or dissatisfied have you been with the response of the GOC to the COVID-19 pandemic?

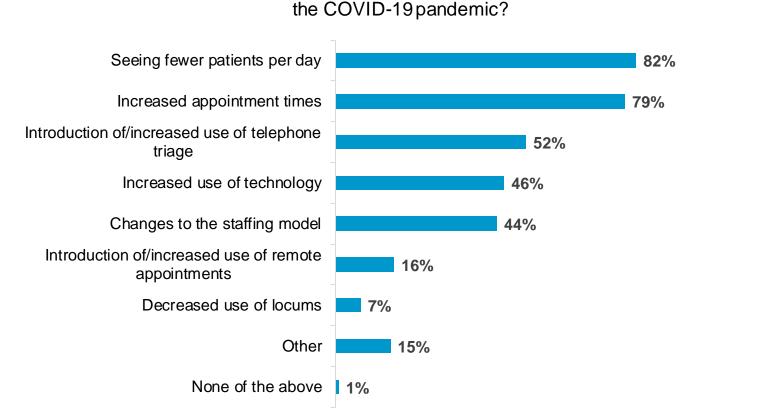
During the pandemic, how easy or difficult has it been to implement infection prevention and control (IPC) guidance?



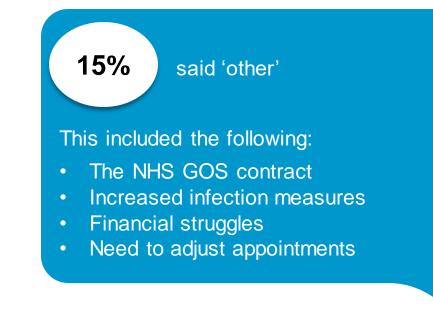


Changes to business practices as a result of the pandemic

The majority said their business had changed practices as a result of the pandemic, with seeing fewer patients per day and experiencing increased appointment times for patients the most common changes.



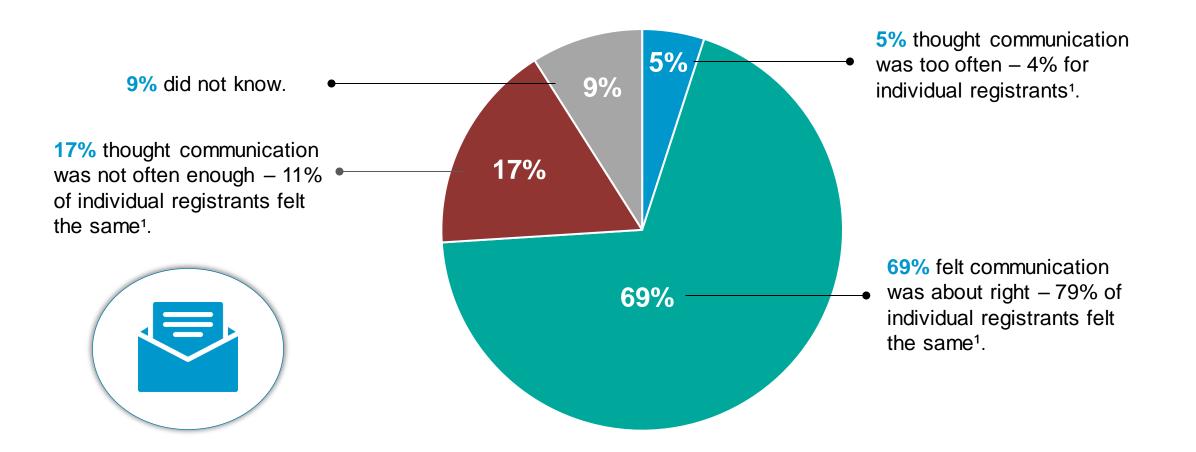
Have your business practices changed in any of the following ways as a result of





GOC communication

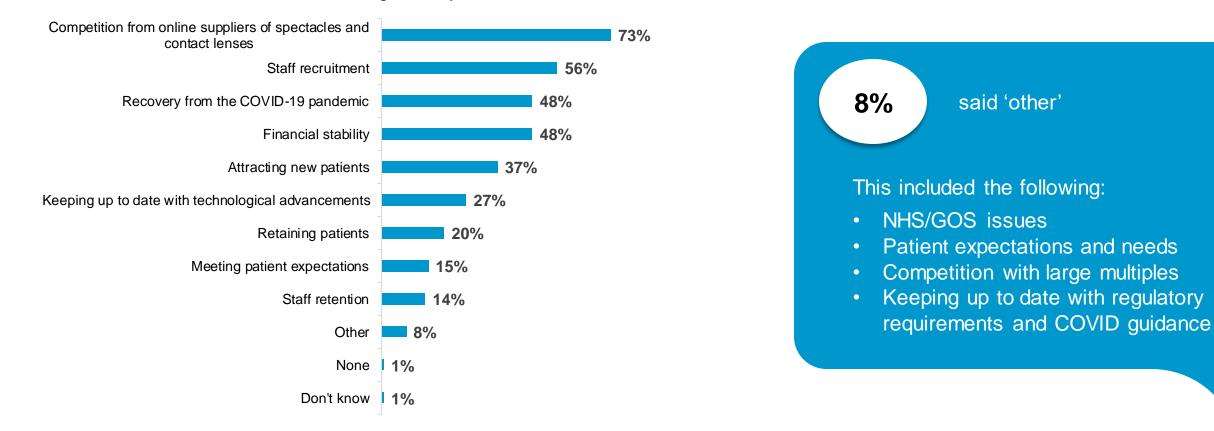
The majority described the frequency of GOC communication as 'about right' and just under a fifth thought that it was not often enough.





Business challenges

Three quarters said their business faced competition from online suppliers of spectacles and contact lenses and many faced issues with staff recruitment, recovery from the pandemic and financial stability.

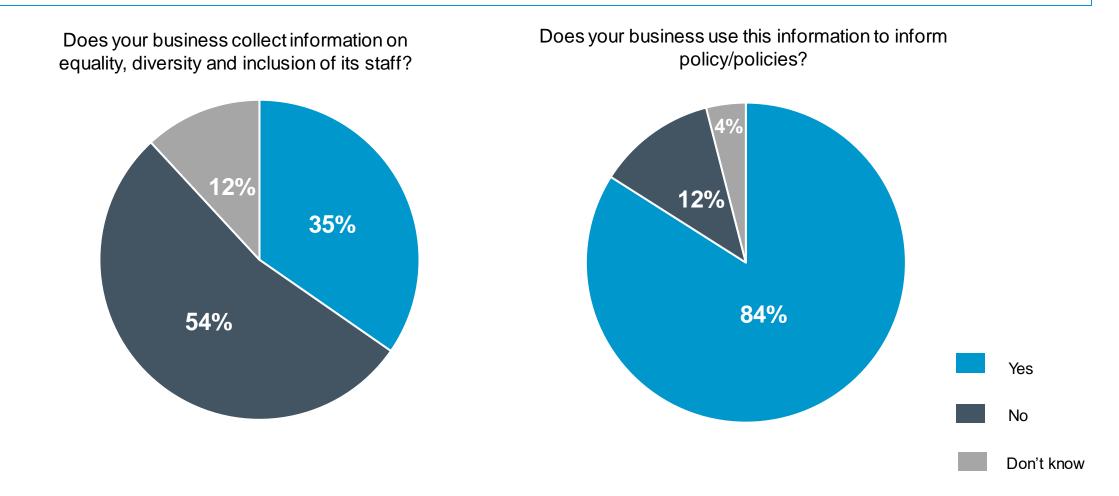


What are the main challenges that your business faces?



Equality, diversity and inclusion information

Only a third reported their business collected information on equality, diversity and inclusion of its staff, but the vast majority of those who did used this information to inform policy or policies.





Conclusions

Conclusions

- The GOC has a good relationship with many of its stakeholders based on mutual trust, good communication and good working practices, and many hold it in high regard, thinking it carries out its functions effectively.
- There was a great deal of positivity about the GOC staff, particularly those in senior leadership positions, and some highlighted recent improvements to the organisation including the fitness to practise function and process, the register and website, education panel visits, general communication and the move from CET to CPD.
- All stakeholders wanted to see the GOC remain as the independent regulator of the sector and they do not want to see it merged with other regulators.
- Despite the positivity, there were a few areas in which stakeholders felt the GOC could improve, such as listening and acting on feedback from stakeholders, improving responsiveness and staff understanding of the sector, gaining more input from patients and the public, and less siloed working.
- There were mixed perceptions of the ESR, with some thinking it was an achievement and others highlighting issues and criticising the GOC for not acting on some of the feedback received from stakeholders.
- There was a great deal of positivity about the GOC's pandemic response, with praise for its flexibility and its COVID statements, although a few felt it was slow to react and that transitioning out of emergency measures had been chaotic.
- Stakeholders felt the GOC had an important role to play in the various challenges and issues in the optical sector to ensure regulation was appropriate and proportionate, registrants are adequately skilled, and trained to meet changing scopes of practise and to update the Opticians Act as appropriate.



Conclusions

- It was reported in the interviews that there were some low levels of confidence in the GOC in the wider sector, and this was
 reflected in some of the business registrant survey results. For example, more respondents disagreed than agreed that the
 GOC is delivering world-class regulatory practice and transforming customer service, and a larger proportion did not have
 confidence in the way it regulates optical professionals and businesses than had confidence.
- However, the majority of business registrants were positive about the annual retention process and the quality of optical education, had a positive understanding of the Standards for Optical Businesses, were confident in their ability to meet the standards and had a positive understanding of the 'Speaking up: guidance for registrants'.
- The vast majority of business registrants had seen changes to their practice as a result of the pandemic, with seeing fewer patients per day and increased appointment times the most common changes.
- Business registrants said their businesses face many challenges, of which the most common were competition from online suppliers of spectacles and contact lenses and staff recruitment, which were some of the sector issues highlighted through the stakeholder interviews.
- Business registrants said their businesses were also facing issues with recovery from the pandemic, financial stability and attracting new patients.
- There is some collection of EDI information about staff, but the majority said their business does not collect this information.



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