

# Fit for the future

Strategic Plan 1 April 2020 to 31 March 2025



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### **About us**

The General Optical Council (GOC) is the UK-wide regulator for optometrists and dispensing opticians, student optometrists and dispensing opticians, and optical businesses. We exist to protect the public by raising standards in the optical professions.

Our '**Fit for the future**' strategy for 1 April 2020 to 31 March 2025 describes what we plan to do over the next five years to achieve our vision of being recognised for delivering world-class regulation and excellent customer service.

#### Our mission is...

to protect the public by upholding high standards in the optical professions

#### Our vision is...

to be recognised for delivering world-class regulation and excellent customer service

### **Our values**

The interests of patients and the general public are at the heart of all we do, and we aspire to the timeless seven (Nolan) public sector principles of public life (selflessness, integrity, objectivity, accountability, openness, honesty and leadership).

Our values underpin the way we work with each other, and with the public, our registrants and partner organisations:

- We act with **integrity**
- We pursue **excellence**
- We **respect** other people and ideas
- We show **empathy**
- We behave **fairly**
- We are **agile** and responsive to change

### Looking back

Over the past five years we supported our registrants to deliver excellent eye care and to continuously improve, through:

- Publishing revised standards of practice for optometrists and dispensing opticians and introducing standards for optical students.
- Introducing a duty of candour, guidance on consent and supporting "speaking up" to underpin a culture of continuous improvement.
- Publishing new standards for optical **businesses**, formalising our expectations and ensuring that they complement the standards for individual registrants.
- Approving **new, innovative education provision** including four-year optometry masters' programmes and laying the foundations for broader reform by launching and taking some key decisions regarding the Education Strategic Review.
- Introducing new processes for dealing with applications for registration from both within and outside Europe.

- Completing two successful cycles of Continuing Education and Training (CET) and revalidation with most registrants successfully re-registering and with an encouraging growth of reflective practice.
- Improving MyGOC and MyCET, making them much more accessible and user friendly in response to feedback from registrants.
- Applying new **acceptance criteria** for fitness to practise cases that ensure we only investigate those cases where there is a genuine fitness to practise concern.
- Funding the **Optical Consumer Complaints Service (OCCS)** to deal with more low-level complaints that need resolution.
- Providing new, improved hearings facilities following the relocation of our offices to the Old Bailey.

#### We have achieved this because of:

- The energy and commitment of our focused and talented **staff**.
- Sound advice from members of our advisory committees (Standards, Education, Registration and Companies).
- The use of **expert advisory groups** on particular topics.

- A newly established **business forum**.
- Wider input from registrants through a new consultation platform.
- Collaborating with other regulators to deliver greater efficiency and impact.

# New challenges and opportunities

We are proud of what we have achieved but recognise there is more to do. Some examples of external influences that will affect our work include:

- An ageing population and new treatments are driving greater demand for eye care services across the UK. Ophthalmology now represents more than eight per cent of all NHS outpatient attendances in England, the highest of any of the recorded specialities.1 However, capacity to provide ophthalmology services has not grown quickly enough to meet demand, meaning that meeting patient needs is a real challenge. Optometrists and dispensing opticians have the potential to reduce the burden on the NHS and the wider healthcare system. They may need to upskill in order to meet the needs of healthcare commissioners to deliver more care in community or domiciliary settings, and effectively manage and treat more vulnerable patients and patients with complex needs.
- Technological development that is changing the way optical professionals work, with optical coherence tomography (OCT) machines increasingly available in community practices and new developments in online/remote consultations and use of artificial intelligence. These changes will have the potential for both positive and negative impacts on patient care and the way it is delivered and the GOC will need to closely monitor how these developments may affect its regulatory work.
- Increasingly multi-disciplinary approaches
  to patient care across the NHS and
  commissioned services means that we need
  to engage proactively with our colleagues
  in other healthcare organisations and pursue
  joint initiatives with other health and social
  care regulators to maximise opportunities to
  improve patient care.

- Growth in online and remote provision of services and a workforce that seeks ever greater flexibility in their working hours and practices. We will need to consider our own regulatory approaches including the standards and guidance we provide in light of these changes. We may also need to consider our approach to providing customer service for our registrants.
- Changing business models as employers and businesses adapt to new technology and customer preferences may result in changes to the way care is delivered to patients. Some of these changes will make care more accessible and efficient, but they may also reduce the lack of face to face interaction with certain patient groups. This could change the risk profile and implications for regulatory activity.
- Political and international developments
   such as the impact of COVID-19 or Brexit
   may affect the way we regulate and deliver
   our strategic objectives, including how we
   regulate in a national emergency situation,
   how we register those qualified outside the
   UK or the delivery of cross-border care. It
   will be important for us to monitor and be
   agile in our response to the changing external
   environment.

<sup>&</sup>lt;sup>1</sup> This data is available in the NHS Digital publication Hospital Outpatient Activity 2018–19: https://digital.nhs.uk/data-and-information/publications/statistical/hospital-outpatient-activity/2018–19

# New challenges and opportunities

#### There are some things we have started that need to be completed and embedded:

- Redefining the **education requirements** for new registrants for the next decade and beyond through our Education Strategic Review is an enormously important and complex piece of work that will enable us to maintain public protection as the roles of registrants evolve. Decisions on some key elements of the new system have now been taken, with plans to move to the new system from 2022.
- We are also planning significant changes to the training and professional development required for continuing registration, which will come into effect in 2022.

#### There are some things we know we can do better:

- Completing **fitness to practise** cases more quickly is a key priority. We have a full programme of work to address this multifaceted challenge and are excited by early signs of success. But this is a long-term project that will require continued focus.
- Our communication with complainants, witnesses, registrants and providers is something we know we must improve. We need to put our customers centre stage and ensure that we are focused on the need to deliver benefits for patients and the wider public. This person-centred approach will include a more collaborative approach to regulation, with a greater emphasis on 'co-creation'. In doing so, we will promote a more positive, rounded perception of the GOC.
- **Sharing information** and **learning** from our work, appropriately and more effectively (with registrants, across teams and with other regulators) can prevent public harm and reduce costs. We have begun this work in some areas but need to do more. Sharing learning between the regulators and the Professional Standards Authority will be particularly important moving forward given the Government's legislative reform agenda.
- We have made some advances but need to go further in making our information more accessible, using modern technology and communicating in ways that the receivers of information from us prefer.

#### There are some big opportunities also:

- Government has embarked upon a programme of regulatory reform to align the regulation underpinning different regulators as far as is feasible. It has said that it will prioritise regulation to strengthen governance and give greater flexibility in relation to fitness to practise proceedings, but it is also planning to go further and consider registration and education functions.
- Importantly for the GOC, they have also agreed to consider business regulation.
- We have committed to greater collaborative working with **healthcare regulators**, not just to improve synergy and cost effectiveness, but to ensure that by working together we achieve the greatest impact possible on public safety.

# Looking forward

#### **Strategic objectives**

Our priorities are organised under three overarching strategic objectives:

Delivering world-class regulatory practice

**Transforming** customer service

Building a culture of continuous improvement

### Looking forward

#### Work programmes

For each year of the strategic plan we will publish a separate business plan setting out the specific milestones, outputs and outcomes that we plan to deliver. In this document, we have given an indication of the key work programmes that will be undertaken to deliver each of the strategic objectives and when they will occur over the five years of the strategic plan.

We will also formally evaluate progress against the strategic plan after three years and consider whether we need to revise our priorities to reflect developments in the interim.

#### Equality, diversity and inclusion (EDI)

A diverse workforce can enrich and add value to an organisation, bringing benefits such as greater productivity, different perspectives, more creative ideas and improved relations with patients, the public and other customers.

Our EDI strategy for 2020–25 will focus on the same strategic objectives to ensure that there is complete alignment of our goals and we have drawn out some key aspects of our EDI strategy under each strategic objective.

We will also nominate an EDI lead who will work with the Senior Management Team to ensure that this work has a high profile and priority across the organisation. All projects will have an EDI strand and we will ensure that thinking about EDI is incorporated right from the very beginning, whether we are developing or revising policies and processes, or implementing legislation. This will involve carrying out and publishing impact assessments to ensure that we consider the impacts of our proposals on the full range of our stakeholders and potential stakeholders.

We will continue to publish EDI data on an annual basis and at the same time, will report on performance against our EDI strategy. In the meantime, we have set out below our initial thinking on the ways in which our EDI strategy will dovetail with the delivery of our three strategic objectives.



#### World-class regulatory practice

- We will reform business regulation, beginning with a review of our overarching regulatory approach and the balance between regulation of business and individuals. We will seek to better protect the public by introducing a comprehensive, simpler and more effective system of business regulation that covers all UK businesses providing eye care services and/or supplying spectacles or contact lenses where this must involve registered practitioners, and which promotes rather than hinders the growth of these businesses.
- As part of this work we will consider what powers are necessary to ensure compliance with our business standards, including the merit of seeking inspection powers in line with some other professional regulators. Any regulatory intervention will be evidence based.
- We will consider what EDI information should be collected from businesses as part of the registration process. We will also take steps to raise awareness among patients with disabilities of what they can reasonably expect from their eye care provider.

Work programme to support objectives	Start	Finish
Develop business case and secure agreement for legislative reform of business regulation	Apr–Jun 2022	Oct–Dec 2023
Implementation of new business regulation regime	Jan-Mar 2024	Jan–Mar 2025

- We will revise our standards for individuals

   optometrists, dispensing opticians and students in order to ensure continued public protection, taking opportunities to harmonise standards across the different healthcare professions likely to work together as part of multi-disciplinary teams. As part of this work, we will continue to issue additional guidance as and when needed.
- In revising our standards for individual practitioners, we will review our expectations of how registrants deliver safe and accessible care for all.

Work programme to support objectives	Start	Finish
Develop guidance on 'speaking up' for registrants	Apr–Jun 2020	Jan-Mar 2021
Publish and implement guidance on 'speaking up' for registrants	Apr–Jun 2021	Jan–Mar 2022
Develop and consult on new standards of practice for individuals	Apr–Jun 2021	Oct–Dec 2022
Publication and implementation of new standards of practice for individuals	Jan-Mar 2023	Jan-Mar 2024

- We will introduce a new system of education standards, outcomes and quality assurance, to ensure that the skills and abilities of our registrants remain up to date and in line with the needs of the healthcare system. This will involve consideration of both pre- and post-registration needs.
- In implementing new education standards, outcomes and quality assurance procedures we will continue to conduct impact assessments and will incorporate a new section on EDI in our handbook for education providers.

Work programme to support objectives	Start	Finish
Development and consultation on outcomes and standards for education and new quality assurance scheme	Apr–Jun 2020	Oct–Dec 2020
Implementation of learning outcomes, standards for education delivery and new quality assurance scheme	Oct–Dec 2020	Apr–Jun 2022
Review and implement any changes to non-UK registration scheme resulting from outcomes of Brexit negotiations and change to education scheme	Apr–Jun 2020	Oct–Dec 2021
Launch of new quality assurance scheme and acceptance of applications for qualification approvals	Jan 2022	Mar 2022
Transition period for all qualifications to move to new quality assurance scheme	Jan-Mar 2022	2024/25 and beyond to 2028

- We will introduce new continuing professional development (CPD) requirements with a continued focus on revalidation but with more flexibility for registrants to reflect on their own learning needs and to undertake learning in line with their own career goals, including specialisation if appropriate. We will aim to phase in the reforms over the next three years, prioritising the shift to our Standards of Practice for Optometrists and Dispensing Opticians underpinning the new CPD system.
- In our introduction of new CET requirements and the associated development of the MyCET online website, we will review the way we deal with exceptional circumstances, often related to maternity, illness or disability.

Work programme to support objectives	Start	Finish
Development and consultation on new CPD scheme, including proposed introduction of reflective practice requirement and move to Standards of Practice	Apr–Jun 2020	Oct–Dec 2020
Implementation of new CPD scheme	Jan-Mar 2021	Oct–Dec 2021
Launch new CPD scheme	Jan–Mar 2022	Oct–Dec 2024

• We will implement new legislation, once this is enacted, to establish a unitary board and will consult on how to exercise new powers that the board will have to set rules in all parts of our regulatory activity. Wherever possible we will do this jointly with other regulators to develop greater coherence and to benefit from one another's different experiences. We will also ensure that we gain appropriate expert input, building on our recently established Advisory Panel, which brings together all our advisory committees. We will continue to manage any potential conflicts of interest in line with our policy available on our website.

Work programme to support objectives	Start	Finish
Implementation of Government reforms to the governance of GOC	Apr–Jun 2020	Jan–Mar 2022
Implementation of Government reforms to the fitness to practise process	Apr–Jun 2020	Jan–Mar 2022
CPD scheme underpinning legislation	Apr–Jun 2020	Oct–Dec 2021
Legislation to support new business regulation model	Apr–Jun 2022	Oct–Dec 2023
Review of student registration	Jul-Sep 2023	Jan–Mar 2025
Brexit post-transition period plan preparation and implementation	Apr–Jun 2020	Jan–Mar 2021

#### Transforming customer service

- We will develop a customer service **strategy** to make it easier for patients, the public, registrants and other customers to work with us. This will include developing our relationships with internal and external stakeholders and working in partnership with specialist organisations where appropriate.
- In developing our customer engagement **strategy** we will consider the needs of patients, the public and other customers, particularly those who may be more vulnerable or where we need to provide appropriate mechanisms to engage them because of physical or other barriers.

Work programme to support objectives	Start	Finish
Review, development and launch of a new public website	Apr–Jun 2020	Jul-Sep 2020
Development and launch of new MyGOC website for registrants based on Microsoft 365	Jul-Sep 2020	Jan–Mar 2021
Revised communications strategy	Jul-Sep 2020	Jan-Mar 2022

 We will address our long-standing issues with timeliness in fitness to practise, taking advantage of the opportunities new legislation will provide and utilising opportunities for developing new rules and approaches jointly with other regulators.

Work programme to support objectives	Start	Finish
Develop and implement improved fitness to practise case management system	Apr–Jun 2020	Apr–Jun 2021
Delivery of average 78-week timescale for processing of fitness to practise cases	Apr–Jun 2020	Jan–Mar 2021
Review and implement improvements to end to end timescales for processing fitness to practise cases following implementation of revised fitness to practise rules	Jan-Mar 2024	Jan–Mar 2025

- We will review and modernise all our **processes** applying 'lean' methodologies where appropriate to make best use of resources, maximise efficiency and ensure value for money.
- In reviewing and modernising our processes, we will explore why it is that some groups of registrants are more likely than others to progress to formal proceedings when a complaint is raised with us and take further action as appropriate.

Work programme to support objectives	Start	Finish
Review and implement new illegal practice strategy	Apr–Jun 2020	Jan–Mar 2022
Project to automate registration processes	Jan-Mar 2021	Jan–Mar 2022
Research into impact of GOC fitness to practise processes on different groups of registrants	Jan-Mar 2021	Jan–Mar 2022
Review, develop and implement new processes for presenting GOC fitness to practise cases (advocacy)	Jul-Sep 2020	Jul-Sep 2023

- We will develop a learning culture to ensure that risks, issues and good practice identified through our regulatory work are fed back into all parts of the organisation. We will achieve this by better collection and analysis of our own data and that of others, for example, learning from our fitness to practise cases, whether they progress to a hearing or not, can inform our standards, guidance and professional development. We will also share this learning proactively with registrants and their representative bodies in order to prevent public harm, including through a new regular learning bulletin.
- We will explore using thematic reviews of areas of identified risk, taking account of concerns raised by members of the public, registrants, and fitness to practise cases. We will seek to understand the risks associated with vulnerable patients, particularly those who are seen in domiciliary settings.
- In our development of a learning culture, we will ensure that we are able to capture and share learning of the impacts of our role on those with different protected characteristics<sup>2</sup>, including where there are specific impacts related to intersectionality<sup>3</sup>.

Work programme to support objectives	Start	Finish
New fitness to practise learning bulletin developed and introduced	Apr–Jun 2020	Jul-Sep 2020
Improve recording, analysis and sharing of fitness to practise data	Apr–Jun 2020	Jan-Mar 2022

#### Continuous improvement

- We will complete the investment in our information technology (IT) **infrastructure**. IT forms the foundations for everything we do and over the last two years we have made significant investment in IT to improve the GOC's infrastructure. resilience and security. We will complete this journey by giving the GOC a business platform centred on the cloud-based Microsoft Office 365. From this our Customer Relationship Management (CRM) systems will be developed to deliver working practice improvements and efficiencies, ensuring that we continue to keep information safe and secure and that our staff's time is focused on value-added activities.
- In completing the investment in our IT infrastructure, we will ensure accessibility of our new website, with a primary focus on those with sight impairment and we will continue the work we have begun to capture more and better data on a wider range of protected characteristics to help inform and shape our regulatory work.

<sup>&</sup>lt;sup>2</sup> It is against the law to discriminate against someone because of: age; disability; gender; reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. These are called protected characteristics.

<sup>&</sup>lt;sup>3</sup> The theory that the overlap of various social identities, such as race, gender, sexuality, and class, contributes to the specific type of systemic oppression and discrimination experienced by an individual.

Work programme to support objectives	Start	Finish
Implement SharePoint 365 for document management including the migration of existing file storage to this platform	Apr–Jun 2020	Jan-Mar 2021
Upgrade our CRM system to Microsoft Dynamics 365 cloud	Apr-Jun 2020	Jan-Mar 2021
Introduce additional cyber security measures including two-factor authentication for staff	Apr–Jun 2020	Jul-Sep 2020
New secure portal to share information with external parties involved in fitness to practise, registration and education processes as well as those members on Council and committees	Jan–Mar 2022	Jan–Mar 2025
Development of CRM to support regulatory functions	Apr-Jun 2021	Jan-Mar 2025
Archive management project to reduce historic paper records	Apr-Jun 2020	Jan–Mar 2022
Review of data collection on protected characteristics to better inform regulatory policy and impacts	Jan–Mar 2022	Jan-Mar 2024

- We will develop and implement a people **plan** to make the GOC a great place to work. The GOC's IT will enable its staff to work in an agile and flexible way, providing staff with a more positive work-life balance. This will be supported by the ongoing work to modernise our human resources policies, with continued well-being initiatives and learning, training and development programmes to recruit and retain our talented staff. Looking further ahead, the break in our office lease in 2025 will enable us to identify the best environment and location from which our staff can carry out our functions for the benefit of our registrants, patients and the general public.
- In developing and implementing our people plan, we will demonstrate our commitment to EDI by implementing an EDI Leadership Plan and other recommendations arising from our EDI Review.

Work programme to support objectives	Start	Finish
Staff engagement plan developed and implemented	Apr–Jun 2020	Jan-Mar 2021
Develop and roll-out of three-year management development programme	Apr–Jun 2021	Jan–Mar 2025
EDI training for all staff with enhanced training for managers	Apr–Jun 2020	Jan-Mar 2021
Review of IT resources including printers, laptops, internet and phones	Apr–Jun 2020	Jan-Mar 2021
Review of GOC premises and working environment	Apr–Jun 2022	Jan–Mar 2025
HR policy review project	Apr–Jun 2020	Jan-Mar 2023

- We will deliver and embed our efficiency **programme** to maximise value for money and fund the new things we want to do without asking for more funds from our registrants. This will include seeking process improvements across the organisation, ensuring we reach the financial break-even point by 2021/22 and continue to operate within our annual income thereafter.
- EDI: In delivering and embedding our efficiency programme, we will maximise our chances of success and avoid wasted costs by ensuring that those requiring reasonable adjustments to participate in our processes are given the right support at the right time.

Work programme to support objectives	Start	Finish
Development and implementation of 'paperless' hearings procedures	Apr–Jun 2020	Oct–Dec 2021
Pilot and introduce virtual/remote hearings processes	Apr–Jun 2022	Jan-Mar 2024
Implement outcomes of our pilot of a central enquiries team to provide improved customer support	Apr–Jun 2020	Jan-Mar 2021
Review of internal banking and accounting procedures	Apr–Jun 2021	Jan-Mar 2024
Review of internal business planning and budgeting processes	Apr–Jun 2020	Jan–Mar 2021

### What will success look like?

#### We will measure our success through the following high-level outcomes:

- In aspiring to be world-class we should be rated highly by the Professional Standards
   Authority. We will aim to meet all their standards but will not let this get in the way of trying new and innovative approaches to regulation.
- **Public confidence** in the professions we regulate is already strong and we expect this to be maintained if we are to uphold high standards. By protecting the public, we are also protecting the reputation of the optical professions. We have instigated an annual public perceptions survey and will continue this throughout the period of this plan.
- We should also retain the **confidence of the optical professions** and we will measure
  this through an annual registrant survey
  and regular stakeholder survey, looking, for
  example, at the extent to which we follow
  our values including behaving fairly, acting
  with integrity and pursuing excellence.
- We expect **customer satisfaction** with the GOC to increase if we deliver on our customer engagement strategy. We do not have a robust baseline and will prioritise the development of this in 2020/21, with an emphasis on patients, the public and registrants.

These high-level outcomes will be underpinned by a range of output measures set out in our annual business plans. These will be aligned to the measures used by the Professional Standards Authority and importantly, the things that matter to patients and the wider public, and to our customers and stakeholders more generally.



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You can get this plan in Welsh by visiting www.optical.org

The GOC is a charity registered in England and Wales (1150137)