

Response of the Association of British Dispensing Opticians

Q1. Do you agree with our vision 'safe and effective eye care for all'?

Yes

No

Not sure

Please explain your reasoning.

We share the desire for 'safe and effective eye care for all', but we question whether this an appropriate vision to guide the GOC's work for the period until 2030.

The GOC should be able to achieve its vision using the levers at its disposal and operating within the statutory framework created by the Opticians Act. The proposed vision does not meet this test.

First, the GOC is the statutory regulator for dispensing opticians, optometrists and registered optical businesses. These registrants play an important role in providing eyecare in the UK, but so do other healthcare professionals, such as orthoptists, ophthalmic nurses and ophthalmologists, and other healthcare providers, including NHS and independent service providers. Therefore, the GOC does not have leverage over all the actors involved in the UK's system of eyecare.

Secondly, the GOC does not have the levers to achieve 'safe and effective eyecare for all'. Upholding high standards is part of achieving this goal, but other factors will also have bearing on whether the goal is achieved. For example, safe and effective eyecare for all will also rely on the effective funding and commissioning of eyecare services, with these services being underpinned by technology that enables the sharing of information between different parts of the system.

For these reasons, adopting the proposed broad vision would not provide a clear focus for the GOC's activity over the next five years.

Another reason not to adopt such a broad vision is that measuring progress in achieving it would require an expansion of the GOC's approach to research and data-gathering. This would involve considerable expense, with the costs being borne by its registrants.

Q2. Do you agree with our mission 'to protect the public by upholding high standards in eye care services'?

Yes

No

Not sure

Please explain your reasoning.

We agree that protecting the public by upholding high standards is a good encapsulation of the GOC's role, but as explained in the answer to question 1, describing the GOC's mission as relating to eyecare services in general is too broad a description of its role.

Q3. Are there any other developments we have missed from our analysis of the strategic context in section 2?

Yes

No

Not sure

If yes, please explain the missing developments.

Myopia management is an important, evolving area of optical practice, with a range of interventions available to slow the development of myopia among children and young people. Dispensing opticians and optometrists have an important role in providing advice and treatment in relation to myopia management.

It is also worth highlighting myopia management using spectacles is dependent on spectacles being fitted correctly. This provides an additional reason to ensure that practitioners who fit spectacles for children have the necessary expertise and if not registrants, are supervised appropriately.

You have mentioned that an ageing population will lead to increased comorbidities and eye health concerns. We would add specific mention of the challenges involved in providing eyecare to patients with dementia.

Registrants will need appropriate education and training to ensure that, for example, they understand the impact of dementia on vision and have the appropriate communication skills.

Q4. Do you agree with our strategic objective 'Creating fairer and more inclusive eye care services'?

Yes

No

Not sure

Please explain your reasoning.

As mentioned in answer to question 1, the GOC does not have the levers to create fairer and more inclusive eye care services.

Q5. Do you agree with our strategic objective 'Supporting responsible innovation and protecting the public'?

Yes

No

Not sure

Please explain your reasoning.

We agree that this should be a key focus for the GOC.

We suggest that in pursuing this objective, it would be useful for the GOC to explore the role that deliberative research could play in gaining views from patients and the public on the potential trade-offs between harnessing technology and public protection.

Q6. Do you agree with our strategic objective 'Preventing harm through agile regulation'?

Yes

No

Not sure

Please explain your reasoning.

We agree with this objective. Agility will be essential in anticipating and responding to the developments which the GOC has outlined.

We would like to understand what 'agile regulation' means in practice and this is an opportunity for the GOC to lead the way among healthcare regulators.

Q7. Do you think any of our strategic themes could affect any individuals or groups with one or more of the protected characteristics defined in the Equality Act 2010?

Yes

No

Not sure

If yes, please explain how.

Q8. Do you think any of the strategic themes could affect any other individuals or groups, either positively or negatively?

Yes

No

Not sure

If yes, please explain how.

Q9. Will the proposed changes have effects, whether positive or negative, on:

(a) opportunities for persons to use the Welsh language, and

(b) treating the Welsh language no less favourably than the English language?

Yes

No

Not sure

If yes, please explain your reasoning.

Q10. Could the proposed changes be revised so that they would have positive effects, or increased positive effects, on:

(a) opportunities for persons to use the Welsh language, and

(b) treating the Welsh language no less favourably than the English language?

Yes

No

Not sure

If yes, please explain how.

Q11. Could the proposed changes be revised so that they would not have negative effects, or so that they would have decreased negative effects, on:

(a) opportunities for persons to use the Welsh language, and

(b) treating the Welsh language no less favourably than the English language?

Yes

No

Not sure

If yes, please explain your reasoning.

Q12. Is there anything else you think we should consider as part of the development of our strategy?

Yes

No

Not sure

If yes, please explain your reasoning.

We encourage the GOC to think creatively about how it can protect patients and the public in relation to the risks posed by services that cannot be regulated using its formal powers, such as services provided by businesses based outside the UK. In our view, raising patient awareness of the risks, and enabling patients to make informed choices, should be an important part of the GOC's toolkit as it is for regulators in many other sectors.

Supporting responsible innovation should be one strategic objective. Combating irresponsible innovation should be another.

ABDO would be happy to work with the GOC and other bodies to explore how collaboration in this area could serve the interests of patients and the wider public.

