

General Optical Council response:

HPC consultation on removing the health reference as a requirement for entry to the register

Policy and Standards Department
Health Professions Council
Park House
184 Kennington Park Road
London
SE11 4BU

6 April 2010

The General Optical Council (GOC) welcomes the opportunity to comment on the HPC consultation on removing the health reference as a requirement for entry to the register. We hope that this response is valuable.

1. Do you agree that we need to retain some kind of requirement relating to health at the point of entry to the Register? If not, why not?

The GOC is supportive of other UK health regulators retaining a health requirement at the point of entry to the Register. We agree that the health requirement is an important safeguard for the public, and that a health requirement can be incorporated in the registration process in such a way that it does not negatively impact disabled people's entry to the professions.

The GOC has a requirement for registrants to make a declaration on their physical and mental as part of the registration process for all individual applicants for registration.

2. Do you agree we should remove the health reference as a requirement for entry to the Register and replace it with a self-declaration? If not, why not?

The GOC supports the CHRE's view that regulatory bodies should adopt a proportionate response to seeking information regarding applicants' health in assessing fitness to practise.

The GOC does not require registrants to provide a health reference as part of the application process for registration; both on initial registration and for annual retention, applicants are required to make a self-declaration regarding their physical and mental health.

We have found this approach to be proportionate for the optical professions.

3. Do you agree with the terms of the proposed self-declaration? If not, why not?

The GOC's health self-declaration is similar to that proposed by the HPC. Details of the GOC's self-declaration is included below, for your information.

The GOC individual registration application forms ask applicants whether they wish to make a declaration regarding either criminal or disciplinary proceedings or physical and mental health. For applicants wishing to make a declaration regarding their physical or mental health, the application form includes the following text:

“Please provide full details of any mental or physical health conditions which a reasonable person would think might impair your fitness to practise. You should give full details of **the name and nature of the condition, the date of diagnosis and any treatment or medication required**. Attach a separate sheet if necessary.”

Kate Fielding
Director of Communications and Information
6 April 2010