

Ms Kathy Evans  
Chief Executive  
The Royal College of Ophthalmologists  
17 Cornwall Terrace  
LONDON  
NW1 4QW.

7 September 2009

Dear Kathy

**The Royal College of Ophthalmologists Strategy Plan 2010-2012 Consultation.**

The General Optical Council (GOC) welcomes the opportunity to comment on the College's role for 2010-2012.

The GOC is one of 13 organisations in the UK known as health and social care regulators. These organisations oversee the health and social care professions by regulating individual professionals. We are the regulator for the optical professions in the UK. The Council currently registers around 23,500 optometrists, dispensing opticians, student opticians and optical businesses.

The GOC's mission is to protect the public by promoting high standards of education, conduct and performance amongst opticians. Our work is built on a foundation of six core values. These values are based on the Better Regulation Commission's criteria for good regulation:

**Proportionate:**

**Accountable:**

**Consistent:**

**Transparent:**

**Targeted:**

**Organisational Excellence.**

The following is the GOC's responses to the seven questions you have posed in this consultation exercise:

**Question 1:**

**In what ways can the College improve the information we provide to patients and the general public?**

- The format of the documents "Understanding Glaucoma", "Understanding AMD" and others is excellent. They are concise documents which make good use of diagrams and plain English to explain the sight problems in terms that the public will understand.
- We get many enquiries about laser eye surgery and a document about it along the lines of these other leaflets would be of great benefit. We would particularly encourage the Royal College to stress the importance of using a registered person who is regulated by the GMC or GOC, and the importance of regulation in protecting the public. Currently a lot of important information in the current document is lost among optical jargon which the public will not understand. In particular, the bulleted list in section 10.2 should be given greater prominence. We recently had two patient-focussed leaflets checked by the Plain English Campaign, an exercise we found to be most valuable.
- We are currently consulting on a Welsh Language Scheme and will be producing Welsh versions of our patient-focussed publications. Provision of the most important public information in Welsh and other languages would be valuable.
- Communication skills training is of great value for healthcare practitioners, particularly training that will help them communicate with people who do not speak English as a first language, people with disabilities or people with learning difficulties. The GOC recently gave a deaf patient the opportunity to write about his experiences of communication difficulties at opticians' practices in our magazine for registrants, *Bulletin*. Giving such an opportunity to people with disabilities is a good way to help ophthalmologists understand the difficulties that patients can face.

**Question 2**

**What can be done to improve the College's relationship with allied professions?**

- We would encourage the Royal College to work closely with partner organisations to help raise awareness of its messages and work. Collaborative working between the various optical organisations can make information for the public and patients easier to access. Collaborative working can also enable information to be disseminated in a more efficient, and effective way. Good constructive relationships with optometrists are

crucial to the satisfactory delivery of ophthalmic care. Their place in the community means that they have an almost unique (the numbers of GOS OMP's are dwindling and their status in comparison to other ophthalmologists quite junior) insight into the patterns of referral and influence of referral caseload. The RCOphth should have optometrists from the high street sector sitting as members of committees specific to discussions on primary care.

- We would encourage the Royal College to consider membership of the Eye Health Alliance, an umbrella group of charities and optical bodies, including the GOC, which campaigns for eye health. Alternatively, working with groups such as the College of Optometrists and Association of British Dispensing Opticians (ABDO) to create a single consumer-focused portal relating to eye health could potentially be strongly in the public interest.
- We have worked with both the Eye Health Alliance and the joint healthcare regulators' PPI group to produce joint publications which we have been able to use at public events. This has helped to both widen the channels through which we can disseminate information, and bring information covering different bodies' work into one place for the benefit of the public. Members of the public with little knowledge of our work have tended to find this very useful.
- The Royal College's website undoubtedly has some documents which are of enormous public value. As it stands, we fear that expensive consumer materials will be accessed very little by consumers simply because they will not know they are there.

### **Question 3**

**What should the College do to raise the profile of ophthalmology in order to ensure adequate future provision of eye care services?**

- We would encourage the Royal College to promote the importance of the patient checking that the practitioner they are consulting is registered with the appropriate regulatory body - an ophthalmologist is GMC-registered, and OMP is GMC registered and that optometrists and dispensing opticians are registered with the GOC. In addition that optometrists who prescribe therapeutic drugs are qualified and registered with the GOC do act as such. Regulation is vital to protecting public safety and the public must be made aware of the dangers of using an un-regulated individuals.

#### Question 4

##### What can the College do to better support trainees?

- The GOC has worked with the professional learned bodies in optics (the College of Optometrists and ABDO) to enhance the quality and consistency of the trainee experience prior to taking the final qualifying examinations and registration. The College of Optometrists website at [www.college-optometrists.org](http://www.college-optometrists.org) provides an excellent and interactive source of information on the optometry trainee experience.
- In addition to each trainee being attached to a supervisor during their pre-registration placement, during which time the trainee completes and maintains a log of patient experiences, the trainee is assessed at regular intervals in practice by an independently appointed College assessor.

#### Question 5

##### What can the College do to better support trained ophthalmologists to maintain and develop their competences.

- The GOC Core Competencies and the Codes of Conduct are key to everything we do. The GOC takes the view that its role is to ensure achievement, maintenance and compliance with these standards as the basis for initial and continued registration. By regularly reviewing the codes and competencies we ensure that registrants' knowledge and skills are maintained at a level commensurate with up-to-date knowledge and skills, but at a level proportionate to the risk to the patient. The GOC Competencies and Codes of Conduct are available on our website at [www.optical.org](http://www.optical.org). We would suggest that the role of the Royal College might similarly be to ensure that the competencies required for trained ophthalmologists are reviewed and kept up-to-date with today's best practice.
- The GOC Core Competencies also form the basis of our Continuing Education and Training (CET) Scheme. The GOC introduced a mandatory CET Scheme in 2005. The statutory details of the Scheme are given in the Council's CET Rules 2005 (amended 2007). The Rules are underpinned by the GOC's CET Principles and Requirements (P&R) document. These are available on the GOC website at [www.optical.org](http://www.optical.org)
- The CET Scheme is managed on our behalf by Vantage Technologies Ltd. Vantage has built a website – [www.cetoptics.com](http://www.cetoptics.com) – which is used to administer the scheme. Registrants use the website to manage their own CET portfolios.
- The CET P&R document defines CET as:  
*The maintenance of the up-to-date knowledge and skills required for the safe exercise of professional activities following the achievement of qualification enabling registration for the professions. CET sustains and maintains the professional knowledge and skills, which would be achieved at the current entry level of competence, utilising a range of modalities and covering an appropriate range of GOC competencies.*

- Entry level CET is defined by the GOC's core competency statements for the two optical professions and for all the GOC specialties including therapeutic prescribing.
- The P&R document describes how the GOC ensures that CET is proportionate to the risks identified by the GOC for each professional group. CET is judged against the GOC's core competencies. The competencies are written to be applicable to each professional group and define the standard and scope of practice for each group. On applying for approval, the CET provider must describe the learning objectives (in outcome terms) which must demonstrate how they are linked to the core competency definitions for the/each target audience(s). The CET P&R document includes guidance to CET approvers, who also receive training in the approval of CET.

### **Question 6**

#### **What environmental factor will impact on services required in the future?**

- The Royal College has correctly identified the UK's ageing population and technological advances in the investigation, monitoring, identification and treatment of ocular condition as the two main factors to impact on services in the future. The GOC would urge the Royal College to work closely in partnership with optometrists and dispensing opticians to look for better ways of working together for more cost effective and efficient services for the benefit of the public.

### **Question 7**

#### **What can the College do to be a more effective communicator to the different groups it works with or serves**

- We would encourage the Royal College to work closely in partnership with GOC registered optometrists and dispensing opticians and adopt the measures suggested in the above responses to better promote safe ophthalmology with the public. Holding public events, especially around areas such as laser eye surgery which are gathering media attention, would be a good way to reach your target audience as well.

### **General Comments**

- The status of the BMA Ophthalmic Committee is anomalous. The BMA is a representative body and as a regulator of the primary care optometry and dispensing optics profession the GOC is frequently referred allegations beyond its jurisdiction because they involve OMP's in primary care practicing in the same context as optometrists. Such cases can only be referred to the GMC. There is no means of seeking patient redress for ophthalmology activity at primary care level other than formal GMC referral.

- We feel that the professional standards of primary care ophthalmologists (OMP's) should come under the Royal College and the BMA Ophthalmic Group only be utilised as a representative body. Further the register and the defining entry criteria should be held by the Royal College and subject to some form of competency assessment.
- Guidance on conduct and scope of practice in primary care amongst OMP's should be consistent with the Guidance of the optical professional bodies (College of Optometrists and ABDO)

I hope these responses are helpful to you.

Kind regards

Yours sincerely

Dian Taylor  
Registrar and CEO