

Thematic review of commercial practices and patient safety

1. Overview

The commercial nature of eye care services is an inherent feature of the sector. When it operates well, this brings several benefits for patients including by spurring innovation that widens access to services and improves the quality of care. GOC surveys show high levels of public trust in the profession and that most patients are satisfied with the eye care services they receive and get good value for money.

However, through our surveys and wider engagement, many registrants have indicated concern about the influence of some commercial practices on their ability to deliver safe patient care. These concerns include the risk of missing diagnosis of eye health conditions due to short sight testing times and clinics being overbooked. Other concerns relate to targets and financial incentives to sell products and services that patients do not need, or which are not in their best interests. Where these factors contribute to registrants feeling unsafe at work due to stress and behaviours like bullying, this can make it more difficult for them to provide safe and effective care.

Another set of concerns relate to barriers accessing eye care services, especially for people in vulnerable circumstances. GOC research highlights the role of cost as a barrier to accessing eye care services, including the cost of the sight test, the cost of eyewear and fear of pressure selling. Contributory factors include a lack of price transparency and patients not being told about eligibility for NHS financial support. There is anecdotal evidence of some businesses refusing to treat young children, including because the costs of serving this group are too high.

Our aim in carrying out this thematic review is to help us understand the nature and extent of these practices and their impacts, and to identify any interventions that we and the wider sector can take to help mitigate against this.

Whilst we acknowledge the challenges of delivering eye care within a commercial setting, as the regulator we must ensure that commercial practices do not impede and are not prioritised ahead of safe patient care. Commercial practices must also not act as a barrier to accessing care, and this is particularly important given the government's priority to deliver more eye care services in the community.

We recognise as a relevant factor the impact of General Ophthalmic Services (GOS) fees and wider NHS contracts on the extent to which clinical services need to be subsidised by the retail part of the business. These dynamics will differ in each of the

four nations reflecting the devolved nature of eye care. While this provides context for our thematic review, contractual reform is a matter for governments to determine and our focus must remain on the role of regulation in line with our statutory remit.

In carrying out this review, we will listen to the views of a wide range of stakeholders to ensure we take a balanced and informed view. Our statutory purpose is to protect the public, but in doing so we also have a role to play in supporting GOC registrants, both individuals and businesses, to deliver safe and effective eye care for all.

2. Our existing evidence base

In 2023, our Europe Economics [research](#) highlighted that commercial considerations can pose risks to patients in the following ways:

- if they prevent optical professionals from providing the best care; or
- if they create incentives to prioritise revenue generation or cost-cutting over and above patient care, for example through product sales targets, unrealistic sight test times, or under-investment in equipment.

In our 2019 risk [research](#), when likelihood and severity of impact factors were combined, 'time constraints with patients' and 'commercial or performance target pressure' were the two highest ranked risks across the study. The study highlighted the connection between these and other risks, and the relationship of these factors to stress, multiplying concerns around patient safety.

Our annual [registrant survey](#) continues to highlight the challenges registrants face in delivering safe patient care. In our 2025 survey, the percentage of respondents who experienced the following sometimes or frequently in the last 12 months was:

- 48% - the standard time allocated for a sight test was insufficient to provide safe patient care
- 38% - felt pressure to see a high number of patients every day which has impacted on their ability to provide safe patient care
- 30% - felt under pressure to meet commercial targets at the expense of patient care
- 25% - were asked to overbook clinics
- 22% - felt under pressure to sell a product or provide a service which they considered was not needed by the patient

In 2025, our lived experience research with registrants who had experienced harassment, bullying, abuse or discrimination in their roles highlighted commercial pressures and increased workload as drivers responsible for loss of job satisfaction that set the context for their negative experiences.

Our [public perceptions](#) research continues to show that the perceived cost of glasses or contact lenses and the sight test, as well as pressure to buy glasses or contact

lenses, drive reluctance to visit an optical business. This is more pronounced for those with any types of vulnerabilities such as a disability or low income.

In our 2025 [lived experience](#) research with patients in vulnerable circumstances, cost of the sight test and glasses were seen as inhibiting for the majority of participants. They also worried about the pressure to buy eyewear, and many were unaware of the financial help, such as NHS vouchers, that might be available. Participants wished for more clarity on the cost of glasses, contact lenses and any add-ons during the sight test and clarity about any help available with costs.

3. Project objectives

- Develop an understanding of commercial practices in the eye care sector in which GOC registrants provide care.
- Understand what, if any, detrimental impact there is on patients/public.
- Understand what, if any, detrimental impact there is on individual registrants.
- Identify actions for GOC and the wider eye care sector.

4. Project scope

From our research and engagement with stakeholders to date, the issues below have been identified. We will explore these further as part of the review, and consider any others that may emerge.

- Overbooking/ghost clinics (these take different forms, but are typically where a business double books patients in a clinic, to mitigate against lost appointments due to patients that don't attend, which may result in rushed or reduced appointment times)
- Short sight testing times
- Commercial targets and incentives (such as selling products and services that are more financially beneficial to the business or that the patient may not clinically require)
- Lack of transparency around costs and eligibility for NHS financial support
- Refusal to treat young children, in part for commercial reasons

We will consider the findings of relevant healthcare inquiries. For example, conflicts of interest can lead to professionals making decisions which are not in the best interests of patients. The [report](#) of the Independent Medicines and Medical Devices Safety (IMMDS) Review highlighted these concerns and recommended increased transparency to support improved management of these conflicts.² The Labour Government inherited outstanding recommendations from the IMMDS review, which could require action by healthcare regulators.

5. Methodology

We will build on our existing evidence base by gathering additional information outlined below.

Internal research

- A LinkedIn conversation on commercial practices to gather data from registrants and those working in optical businesses.
- Analysis of Optical Consumer Complaints Service (OCCS) caseload, fitness to practise cases and enquiries to our professional standards inbox.
- Request NHS data on the age profile of sight tests by contractor.
- Analysis of business websites to assess levels of price transparency and information on eligibility for NHS financial support.
- Analysis of online customer reviews.

Commissioned research

- New questions in our registrant and public perceptions surveys 2026 to build on our knowledge and gain further insights in relation to the incidence, nature and impact of commercial practices on registrants and patients and the public.
- Qualitative research with, for example, business owners and registrants.

Stakeholder engagement

- It is important that we listen to a variety of different perspectives within the sector, and will engage with external stakeholders, such as GOC registrants, business owners, the devolved nations, NHS services, other regulators and organisations representing patients and providers.

6. Outcomes

By the end of the thematic review, we should have a good understanding of the nature and extent of commercial practices in the sector and the harms these may cause to patients and individual registrants. We will produce a published report summarising our key findings and recommendations.

The findings will inform work planned to scope a substantive review of our Standards for Optical Businesses, which is due to begin later this year.

7. Timetable

Item	Date
GOC Council sign off business case	16 September 2025
Research and engagement	September 2025 – May 2026
Report delivered to Council	June 2026