General Optical Council

Stu Sterling OBE
Chief Executive
Ethics and Integrity Comission

Sent by email

23 September 2026

Dear Stu

I write in response to the Ethics and Integrity Commission call-for-evidence. Please find our enclosed information below. I am happy to answer any questions arising from our submission.

Related documents –
https://optical.org/about-us/how-we-work/mission-vision-and-values.html
https://optical.org/resource/member-code-of-conduct.html
https://optical.org/about-us/how-we-work/freedom-to-speak-up.html

1. About us

1.1 The General Optical Council protects the public by upholding high standards in eye care services in the UK. We currently register and regulate around 35,000 optometrists, dispensing opticians, student optometrists and dispensing opticians, and optical businesses, known as registrants.

1.2 We hold registers for optometrists, dispensing opticians, student optometrists and dispensing opticians, specialty practitioners and bodies corporate conducting business in optometry or dispensing optics in the UK.

1.3 We have four core functions:

- Setting standards for the performance and conduct of our registrants.
- Approving qualifications leading to registration.
- Maintaining a register of individuals who are fit to practise or train as optometrists or dispensing opticians, and bodies corporate who are fit to carry on business as optometrists or dispensing opticians.
- Investigating and acting where registrants' fitness to practise, train or carry on business may be impaired.

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1.4 A number of these core functions are undertaken by committees and Council. In this specific context, anyone appointed to a committee or Council is referred to collectively as a member. However, different pieces of secondary legislation apply to different types of member, as articulated in our code of conduct.

2. Our governance

2.1 Our governing document is the Opticians Act 1989. Our governing body is the Council, which is comprised of six lay members and six registrant members. Council members are appointed by the Privy Council, and Council is accountable to Parliament. Its work is overseen by the Professional Standards Authority for health and social care regulators (PSA). The GOC is also a registered charity and regulated by the Charities Commission.

3. How was the Code created?

3.1 The most recent iteration of the code was created in March 2026. It replaced the previous code of conduct, which had been in place since 2021. The code included substantive revisions intended to clarify the duties imposed on our members by virtue of their office. The language adopted reflects that which is used in legislation, the Charity Governance Code and by other regulatory bodies.

3.2 The code was drafted by the Chief of Staff, and feedback sought from our members, Senior Management Team and those who work closely with our members in an operational capacity. Consultation and co-design are seen as critical factors in ensuring a collaborative and collective commitment to ensuring high standards of ethics and integrity.

3.3 The code signposts several statutory duties that are required of our members, including the conditions which would result in disqualification, suspension or removal. The grounds for disqualification are matters that would be established by another authority, such as a court of competent jurisdiction, a regulator (including the GOC's fitness to practise committee) or other statutory authority. Therefore, matters of disqualification are not covered by the code of conduct.

3.4 The grounds for suspension and removal are covered through the code, including identification of where a failure is likely to result in a breach of the code.

3.5 In the stakeholder feedback received, members felt that the code should be unambiguous about where something was considered a breach, rather than using qualifiers such as 'might be' or 'likely to be'. This suggests that the members have a more stringent and less open to interpretation expectation of themselves and their peers. This is not entirely unsurprising given the majority of our members have a role in determining fitness to practise and whether breaches of professional standards would warrant sanction.

4. How is the Code highlighted and shared?

4.1 Following approval by Council, the code was published on the GOC website and shared with all members. Training will be incorporated as part of new member induction, and a regular reminder will be provided alongside our annual compliance check on member interests and declarations. Given the recent extensive engagement through the review process, we do not have training planned in the next two years.

5. Compliance and non-compliance with the code

5.1 We do not reward compliance with the code. This appears to run contrary to the principles of public life (in particular, selflessness and leadership), and the expectations we have of those in public office. However, members receive remuneration from work undertaken, though this is payment for attendance and work undertaken, not for meeting certain obligations provided in the code. As consequence, we do not view suspension of pay as a reliable sanction for members, though suspension of duties while a conduct issue is investigated may in turn result in a loss of income.

5.2 The code sets out the sanctions that might occur as consequence of a breach of the code. These are any of the following:

- Suspension or removal from office (as set out in the legislation)
- a breach of code of conduct letter sent to the member;
- an action Council requires the member to undertake;
- written commitment from the member to abide by specific conditions; or
- a requirement to undertake further education and education and training.

5.3 The code of conduct is intended to enable proportionate use of sanctions to ensure that individuals are not faced with immediate removal for minor offences or lapses of judgement. The GOC recognises through its own regulatory powers that there are several important junctures between errors of judgement, recognition of responsibility, learning and restorative practices. It has therefore made similar provisions within its own code of conduct for members. The code refers to a principle of proportionality which is intended to ensure that the code does not have a greater effect on the personal lives of members than is reasonably necessary to protect the interests and reputation of GOC.

6. Application of the code of conduct

6.1 We expect our members to reflect the principles in the code of conduct in all activities, regardless of whether they are undertaking work on our behalf. This can create ambiguities, particularly where individuals have a range of interests outside their role with us. Explicit conflicts of interest are managed via our management of interests' policy.

6.2 The code has identified that the primary risk for the GOC in this area is member conduct outside GOC work that impacts public confidence in our ability to regulate. Scenarios might include a member's conduct in another setting is reported in public, or comments on social media in a private capacity. The visibility of public leaders in online and social media settings is a key risk in terms of code of conduct issues, particularly where there is a balance between individual freedom of expression and one's obligations in a leadership capacity. In respect to this we are in the process of finalising a social media policy to complement the code. This complies with Charity Commission guidance on social media.

7. Staff involvement in conduct issues, raising concerns and other considerations

7.1 The clear delineation in employment status between our executive (staff) and non-executives (members) means there is limited benefit to a shared code of conduct. Staff are bound by a performance and behaviours framework, which serves as a tool for appraisals and other performance management processes. This framework replicates some elements of the code, though in intention rather than explicit provisions. It covers a wide range of behaviours and is more comprehensive in scope than the member code of conduct. Both executives and non-executives are expected to comply with the GOC values, which were determined by Council in 2020. These are:

- 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

7.2 The new responsibilities relating to the Public Office (Accountability) Bill are likely to apply to senior executives and advisers to Council. We are in the process of considering how to ensure these new responsibilities are captured alongside existing contractual requirements and within the performance and behaviours framework.

7.3 The member code of conduct includes a section on how the executive and members should work together, including responsibility to respect independence and candour. The duty of candour is intended to parallel the commitments to openness and transparency required in regulated healthcare settings. Alongside this, the GOC has also produced a freedom to speak up policy with its employees, members and workers. This replicates the best practice identified by the (now defunct) National Guardians Office.

7.4 The freedom to speak up policy is also signposted where staff have concerns about member conduct. This is particularly critical for less senior members of staff, where a perceived imbalance of status and power could reduce the likelihood of someone reporting concerns. All GOC employees are provided with freedom to speak up training, and the organisation has a named Freedom to Speak Up Guardian. In addition, as Chief of Staff, I am the named point of contact for whistleblowing, with named responsibilities around safeguarding, probity and ethics.

7.5 Code of conduct issues will be considered with respect to an individual's rights to privacy. However, findings and outcomes, including the number of complaints received by the GOC regarding its members, will form part of the GOC's annual report, which is submitted to Parliament alongside its accounts.

8. Conclusions

8.1 As a healthcare regulator, the GOC has a legal duty to set and maintain high standards for its registrants. It can only do this if a parallel obligation exists for its own members, workers and employees. As a public body, a registered charity and an employer, the GOC is committed to making the expectations and responsibilities imposed on its members explicit. The current code is still new; however, we are confident that it models best practice and takes account of the remit of the Ethics and Integrity Commission. We look forward to reviewing the information published following your call for evidence to see what we can learn from the wider public sector.

8.2 In my earlier discussions with Dr Nathan Tamblyn, he asked me to consider what 'candour' meant in the context of our code. I refer you to the GOC guidance on the professional duty of candour for our registrants: The professional duty of candour

8.3 In reference to what it means to healthcare professionals, we mean explicitly that this is a professional responsibility to be open, honest and transparent with patients when things go wrong. As to what this means for public official, I have reflected on this for some time after our discussion, and I would define it as being open, honest and accountable when things go wrong, particularly in reference to:

- A circumstance where the public interest outweighs any organisational, professional or personal loyalties;
- A circumstance where one is compelled to speak up, knowing that it will not be easy or necessarily for one's personal benefit.

Yours faithfully

Andy Mackay-Sim
Chief of Staff
General Optical Council