

## **Response to the petition for the General Optical Council to be investigated for conflict of interest**

The General Optical Council (GOC) is the UK-wide regulator for optometrists and dispensing opticians, student optometrists and dispensing opticians, and optical businesses. We exist to protect the public by raising standards in the optical professions.

We are aware of concerns raised by members of the optical sector as outlined in a recent petition on [change.org](https://www.change.org). Within this statement, we have outlined our position on the issues raised.

### **Guidance on the re-opening of optical practices**

We understand that many people believed that we had changed our position between our statement on 23 March 2020 on the provision of essential eye services in England and the one on 12 June 2020 regarding the re-opening of optical practices. This is not the case.

Optical practices in the UK were exempt from closure as they were designated as healthcare providers rather than retail outlets. The guidance entitled 'Closing certain businesses and venues in England'<sup>1</sup> included the following text '*Services which involve healthcare need to take into account any advice or guidance issued by regulators, the relevant professional body, Chief Professional Officers, or the NHS, as appropriate*'. Similar guidance was issued by the Northern Ireland Executive, Scottish Government and Welsh Government.

The precise terminology and arrangements for delivering primary eyecare differed in each of the four nations, but between 23 March and 14 June 2020 practitioners were only able to deliver NHS-funded care if this was urgent/emergency or essential. The College of Optometrists' guidance and recommendations for this phase suggested that the same considerations should apply to NHS and non-NHS funded care.

We published the explanation behind the 12 June 2020 statement on our website on 16 June 2020: [https://www.optical.org/en/news\\_publications/news\\_item.cfm/goc-response-on-re-opening-optical-practices-statement](https://www.optical.org/en/news_publications/news_item.cfm/goc-response-on-re-opening-optical-practices-statement). We released the statement to clarify our position following the Government's announcement that they intended to re-open non-essential shops in some parts of the UK. This coincided with the College's recommendation on 12 June 2020 that optometrists in England could move to deliver care in line with the amber phase of their guidance from 15 June 2020.

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<sup>1</sup> <https://www.gov.uk/government/publications/further-businesses-and-premises-to-close/further-businesses-and-premises-to-close-guidance>

Contrary to what was stated in an earlier version of the petition, our statement from 23 March 2020 on the provision of essential eye services in England is still available on our website:

[https://www.optical.org/en/news\\_publications/news\\_item.cfm/statement-on-provision-of-essential-eye-services-in-england](https://www.optical.org/en/news_publications/news_item.cfm/statement-on-provision-of-essential-eye-services-in-england)

An updated statement on the re-opening of optical practices was published on 24 June 2020: [https://www.optical.org/en/news\\_publications/news\\_item.cfm/revISED-statement-on-the-re-opening-of-optical-practices](https://www.optical.org/en/news_publications/news_item.cfm/revISED-statement-on-the-re-opening-of-optical-practices)

We have updated our statement based on feedback we received. The changes also incorporate new guidance from Government and/or the NHS across the four nations regarding the resumption of optical services. We have worked closely with The College of Optometrists to ensure that our statement and their guidance is aligned, and we have welcomed input from other sector bodies too.

### **Specsavers video**

On 5 June 2020, we stated on Twitter that we had received several complaints about a video of a Specsavers store which suggested they are carrying out routine eye tests. We also stated that our Fitness to Practise team is considering the matter in line with our rules and legislation. We are unable to make any public comment on any ongoing fitness to practise matter.

### **Conflict of interests**

We are committed to ensuring we have well-defined and transparent processes in order to demonstrate to the public and stakeholders that our decisions are made in the best interests of the public.

Our Management of Interests policy is available on our website:

[https://www.optical.org/en/about\\_us/our-governance/conduct-and-standards.cfm](https://www.optical.org/en/about_us/our-governance/conduct-and-standards.cfm) It provides guidance on what interests must be declared; how and when to declare interests; how to identify and manage conflicts of interest; and how interests will be published.

We take steps to ensure that our process for appointing members, including Council members, is fair, open and transparent. Information is available on our website:

[https://www.optical.org/en/about\\_us/our-governance/member-support.cfm](https://www.optical.org/en/about_us/our-governance/member-support.cfm)

Our Council and Committees are representative from across the professions.

Information on individuals is available on our website:

[https://www.optical.org/en/about\\_us/People/index.cfm](https://www.optical.org/en/about_us/People/index.cfm)

### **Fitness to practise concerns about businesses**

Concerns about the fitness to practise of an individual or business are assessed against the standards in place at the time of the alleged breach. Further information about those standards can be found on our Standards website:

<https://standards.optical.org/>

Our overarching objective is to protect the public and to promote and maintain their health and safety. Our regulatory core functions are:

- Setting the standards expected of optometrists, dispensing opticians, optical businesses and students
- Maintaining a register of those who are qualified and fit to practise, to train or carry on business as optometrists and dispensing opticians
- Investigating and acting where registrants' fitness to practise, to train or carry on business is impaired
- Setting the standards for education and approving qualifications leading to registration

We cannot enforce standards on those organisations that do not fall within our jurisdiction and are operating legally, but we do act on illegal practice in accordance with our protocol which can be found on our website:

[https://www.optical.org/en/Investigating\\_complaints/index.cfm#illegaloptical](https://www.optical.org/en/Investigating_complaints/index.cfm#illegaloptical)

### **Approach throughout the pandemic**

We understand that there is a great deal of uncertainty caused by the pandemic and the fact that different nations have adopted different approaches to meet the different needs of their populations. To ensure our messages are as clear as possible within a constantly evolving situation, we have worked closely with sector bodies in all parts of the UK throughout this period.

In our range of work in response to the pandemic, we have worked with a number of professional and representative bodies from the different nations, including The College of Optometrists, Association of Optometrists (AOP), Association of British Dispensing Opticians (ABDO), Federation of Ophthalmic and Dispensing Opticians (FODO), Optometry Northern Ireland, Optometry Scotland, Optometry Wales and Local Optical Committee Support Unit (LOCSU). We have worked particularly closely with The College of Optometrists to ensure that our statement and their guidance is aligned.

### **Optometry apprenticeship**

We recognise and understand the concerns about the introduction of a degree apprenticeship in optometry. We are responsible for protecting the public by setting the standards for all optometry programmes in the UK and for approving and quality assuring these programmes. Any programme of education and training designed for students who undertake the programme to be able to join our register and practise as an optometrist would require our approval. No application for approval of a degree apprenticeship in optometry has been made to us, nor can be until and unless the optometry degree apprenticeship standard is approved for delivery by the Institute for Apprenticeships and Technical Education.

Our approval function is described in the Opticians Act and our process includes scrutiny by a GOC Education Visitor Panel chaired by a lay person. The panel is made up of individuals with significant and varied experience in academia, optometry and ophthalmic dispensing and, quite frequently, includes an ophthalmologist too.

The final decision as to whether to approve a new qualification is made by Council taking all information into account, including the recommendation of the panel, who look holistically at the programme's quality and consider whether each of our standards is met.

We publish our visit reports on our website so that the public can be assured that the qualifications we approve meet our standards and, where standards are not met, we set time-bound conditions which providers must meet in order to demonstrate that they continue to meet our standards.

We published our position on the proposed apprenticeship standard in December 2019: [https://www.optical.org/en/news\\_publications/news\\_item.cfm/goc-position-on-proposed-apprenticeship-standard](https://www.optical.org/en/news_publications/news_item.cfm/goc-position-on-proposed-apprenticeship-standard)

### **Investigation by the Professional Standards Authority**

Our CEO and Registrar, Lesley Longstone, has spoken with the CEO of the Professional Standards Authority (PSA), Alan Clamp, to indicate our willingness to provide further information on this matter as required.