

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Everything currently performed by registered and qualified Optoms and DOs.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Everything as above.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

All dispensing of spectacles.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Far more disadvantages than advantages. More rechecks etc, missed pathology etc etc.

This is just an excuse to save the multiples money, like they already do employing Dispensing 'assistants'.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Sight testing is best carried out by trained, qualified and registered optometrists. Otherwise, what is the point of the university degree?

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

All sale and supply of optical appliances to everybody should be restricted to qualified and registered optoms and DOs.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better service to customers, and less problems.

Again, multiples save money by employing 'dispensing assistants' so they will not want further restriction.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Only trained, qualified and registered dispensing opticians should be able to sell optical appliances.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Regular sight tests are essential for ocular health.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Missed pathology is main disadvantage.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Fit and suitability of sportswear optical appliances is most obvious disadvantage.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Optical appliances should only be dispensed by qualified and registered optical professionals.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

There is no regulation if the seller is not registered with the GOC. This should be changed.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Do not allow online spectacle sales of any sort.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

As it is today and no authority or management on registrants as the time we need to do a test, what we have to sell, conversion...
Whatever their education, those people must be registered with the GOC to be accountable for their behavior.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Dispensing optician: Anything about dispensing
Optometrist and contact lens fitter: anything about contact lenses and solutions
Optometrists: eye-test and pathologies.
Only optometrists should have the right to deal with ocular diseases, even dry eye or blepharitis.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:

Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

There are already too many qualifications. We should have only 3 qualifications:

Dispensing optician

Contact lens fitter

Optometrist (which should include IP, glaucoma level 1 and 2 as retina level 1 and 2).

We need to update the qualification by adding one year of theory and 2 years of practice, one in hospital.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

As optometrists, we fight to get the right to screen for diseases.

An optical prescription is not only refraction, it is also binocular vision and a pathology assessment. An asthenopia may be linked to a binocular problem, and a change in the prescription may be linked to pathology. Sometimes we need to use a diagnostic drug as cycloplegic to get the right refraction.

If a dispensing optician gets the right to do refraction, who will check the eye? if it is under the supervision of an optometrist who will be responsible? Too many risks that a patient will not be able to be seen by the optometrist. The excuse will be: Do not worry, you will check the eye on collection. You understand the patient is in the rush.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The patient will not be able to make the difference between an optometrist (ophthalmic optician) from a dispensing optician.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I cannot see any disadvantage. The waiting list to get a sight test is only a few days.
Allowing dispensing opticians to refract will push the optometrists' income down. As a result, optometrists will be asked to refract quicker...

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

My patients are old, most of them are over 60's. I estimate the percentage to be 20%

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

If you separate both when the health care will be done? Later, when? On collection? Most patients do not book an appointment to collect their spectacles or contact lenses... They can buy their equipments elsewhere, or may not need any equipment.
As a result, most of the patients will get their spectacles or glasses without their eyes checked...

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Contact lenses increase the risk of keratitis, allergies, dry eyes etc. Patient need to understand those risks and who to contact in case of a problem.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No it increases the safety

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

For the safety of the patient, someone has to check the conformity of the product.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

This is the necessary step. This is what is done with medications. Anyone in the chain of medical prescription has his/her responsibility, the physician, the chemist, the nurse...

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Bad vision, the patient may drive with the wrong prescription.
Eye trauma. Who will pay for that? The NHS?

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Even if contact lenses have no power, they may still hurt the eyes. Who will pay for the treatment? NHS?

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Keratitis, patients may not be able to get the right treatment. They may choose to treat themselves with chloramphenicol...

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Most non-registrant are not educated in optics. They are not able to make recommendations if there are any questions about the patient's eyes. Sales will be more important.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

We should copy what is done in medicine.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Spectacles must be adjusted to give the best vision and comfort to the patient. If you buy online, who does the adjustment?

Who determines the position of the optic centre in the frame? Online sales should be restricted to +/- 2.00dp

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

It should be forbidden to sell over +/- 2.00, bifocal and varifocal online, except if the dispensing and collection can be done somewhere with a dispensing optician.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

As for the refraction, only an optometrist or physician should have the right to evaluate the health of the eyes, including dry eyes and blepharitis.

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Any new optometrists should be trained as IP. This should be include in the curriculum as in the other countries, USA, Canada, Australia...We should not wait 2 years...

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private



Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction. Refraction and understanding the needs both optical, environmental and psychological take time to develop as a skill.

We will see and increase in retests and missed pathology

Fundus examinations. Should only be carried out by qualified personnel

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction

Fundus examination

IP

Glaucoma

Low Vision

Yag

Intravitreal injection

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

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You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Have done to many retests for DO refractions

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

This would just devalue the sight test lead to cheaper running costs for multiples and endanger the public

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The public are only just recognising the value of the profession blurring lines about who does what will confuse them

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I also work secondary care. 60% of referrals are unnecessary

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Fine as it is. Leave it alone it works well

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Under 16

Low vision

Ready refers over +3.00

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

I can see accidental sale if wrong power or lens type occur g. We are already seeing a tidal wave of infections post covid due to people not having regular check ups then the nhs is left picking up the bill because the online seller didn't check their health or overuse of contact lenses

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would harm public please I urge you not to do this o ku yesterday I saw a patient for a glaucoma check up in hospital who asked me to check her contact lenses as she had not had a check up fir 6 years.

I had another last week who asked me to insert his lenses. When I asked he said he always gets a friend to insert them. Another lenstore customer. This would endanger the public further. The thought of me going into a pharmacy and pointing at a medicine because I wanted to use it could be harmful. Equally letting the public do this with contact lenses will harm them. How do we explain to a latent who's child was killed by a contact lens wearer because they bought them without proper checks

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

We will see I fectio s spike as we did in the past and as we do every halloween

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It's confusing fir the public the GOC need to clarify thus to make it easier for the public and professional to have a clear position

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It protects the public however I do think I'm the under 60 sight tests intervals could be switched to every 3 years rather than 2

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I think it will lead to harm for the public we already see people using ready readers for years with the wrong rx

I often see patient come fir the Far East with cheap glasses complaining they cannot see but then I am left to rectify the issue and educate the px

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None it's safe and well understood. But you could extend it to 3 years eight test interval fir under 60s thus will allow more space fir specialist clinics

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It could cause possible long term damage if they wear the wrong rx

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It's fine is work it's not broke leave it alone

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I have worked in telemedicine post pandemic

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Online sight tests don't work. I have looked at this several times. No matter what they claim it gives a refraction but doesn't assess other factors

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Evaluate each system carefully with large scale clinical trial it needs careful regulation

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/a

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think extended scope of practice for registered professionals will need looking at

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction. Eye Examination. Fitting and supply of contact lenses. Dispensing of glasses to children. Dispensing of safety glasses.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction. Eye examination, including interpretation of photographs, data etc.
Fitting and supply of contact lenses.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Online supply of contact lenses. Anyone can log onto a site and buy any contact lens they wish at the moment. There is no regulation at all. I am seeing people wearing lenses that they have simply guessed the power. People buying multifocal lenses without any fitting being done as they want to try them.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

There seems to be a gradual take over of Optometry by people who are frustrated doctors, and want to practice medicine without the appropriate medical school training. The skills of refraction are felt by these people to be below their interest. Look at the list of lectures at any large Optometry conference. hardly a mention of refraction.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

The idea of a random unannounced visit from the GOC is a sound policy.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction is what Optometrists do. It what we do best. It distinguishes us from anyone else.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Large multiples will use lower paid dispensing opticians, to refract, they will not increase wages. They will then push for use of refractometer readings to be used to dispense glasses.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

If a practice is not registered for a MECS type system, then one is obliged to refract a patient who has come in to have an ingrowing lash removed in order to claim an NHS fee. As an example.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It keeps refraction as the speciality of Optometrists. Those who want to go along the medical intervention road can do so, but they will need an Optometrist to do the refraction.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The number of Optometrists and CLO's who fit CL's seems to be adequate.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Fitting of contact lenses can be time consuming, the time is rarely charged for by the large multiples, who hope to make money from online orders.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Children. Adults with learning difficulties.

The supply of low vision aids to those registered as having a visual loss is open to interpretation. Is a camera based magnifier an optical aid?

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Vulnerable people would have a course of legal redress if they are taken advantage of. Much easier to detect and prosecute with a professional regulatory system.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

There is currently no effective regulation of online contact lens sales at all.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

There does not appear to be any enforceable restriction to online sales of contact lenses. It is a free for all. The contact lens manufactures seem to be happy with this arrangement.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

It should do, but it does not.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The current law is ignored. GOC have done nothing about this at all.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

A physical eye examination ,face to face. Using appropriate equipment including over refraction.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

A contact lens is a risk to the eye of the wearer, irrespective of whether it is zero power or +6.50. Tinted/coloured contact lenses are often harbours of infection due to poor hygiene.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

see above

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

see above

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There appears to be no currently enforced regulation.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Are people to simply guess their optical prescription? Use an auto refractor as the large multiples want to move to?

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It is not 100% ideal, but seems a reasonable compromise.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

People digging out old Rx and getting it made up to discover that is actually for their father, who has the same name (seen that done). Having an old pair of glasses focimetered to get a prescription, then realising they belong to someone else, (seen that as well).

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I am now tired of answering the same question over and over, please use a different form of wording.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Children wearing ill fitting goggles which can damage soft tissue.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protection of children is usually considered a good thing in a civilised society.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safety glasses need to continue to be regulated.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Online contact lens sales are unregulated. The supply of multifocal glasses by online suppliers is a real problem for an optometrist to sort out if the patient is not happy with the vision or appearance of the glasses.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Online supply of glasses should be restricted to single vision ,low powers only.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

[redacted] recently removed the His and Hers signs above the frame displays as they were worried about offending people who were unsure of their own sex.

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

- testing of sight - health check and refraction
- fitting contact lenses
- sale and supply of optical appliances

7 What activities do you think must be restricted to our registrants?

Please provide details.:

- testing of sight - health check and refraction
- fitting contact lenses
- sale and supply of optical appliances

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Glaucoma qualifications/ med ret cert

A changing landscape of care provided by optometrists - these need approval as will become more widespread as optometrists provide a greater range of care to the public

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Separating refraction and eye health check could be catastrophic.

In 20 years of practice I have diagnosed people with eye conditions when they did not know they had a problem almost on a daily basis. The effect on public health would be lots of people not being diagnosed with eye conditions until significant and irreversible sight loss has occurred - this would clearly not be in line with your primary directive of maintaining patient and public safety. It would also cause a greater burden on the health service.

We currently have (I believe) one of the most effective systems in the world for screening & diagnosing eye conditions - this is significantly linked to refraction being linked to eye health checks. Our system of linking the two encourages people in to a eye health screening service - it is notoriously difficult to get patients to attend health screening services - why separate refraction and health checks - it will cause the health checks to be an afterthought where it's very hard to get patients to attend - massive detrimental effect of public eye health!

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Please see prev answer.

The only advantage is lining the pockets of [redacted] directors. Please don't allow pressure from businesses who's main aim is to make money (not look after patients) influence your regulation of our industry.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantage would be that we could continue providing high levels of eye care to the public, and by continuing to link refraction and health checks we carry on encouraging the public into a valuable eye health screening service to detect early signs of eye disease.

The disadvantage would be none, we have a system which works well, no equality, diversity and inclusion issues as NHS eye exams are free to all. The only disadvantage would be (and this should NOT be one of your considerations!!) that this link can get in the way of some businesses money making ideas.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

In an average week I refer 8-10 patients

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Anecdotal (and common sense) data says that if those 8-10 patients were not referred by me their eye conditions would get worse and cause sight loss. They would also more than likely end up presenting either to their GP or the eye hospital with their conditions in a much worse state and require greater time and effort from the NHS to care for them, or have irreversible sight loss.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Contact lenses must be fitted with by a qualified person to ensure they can ensure the health of a patients eye is preserved.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If the regulations were relaxed you would have many people with poorly fitting contact lenses and the medical problems this can cause, and without all the correct advise and management patients are far more likely to get sight threatening diseases - a definite risk to public health.

Studies have shown that the single greatest contributing risk factor for catching microbial keratitis is buying contact lenses from the internet as these patients do not bother to attend regular aftercare appointments.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

I am not aware of the current regulations (if adhered to) causing any problems

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

none

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

The only problem I have with current regulations is that the way the [redacted] interpreted it is that we can only supply lenses which will last up until the patient needs to have their aftercare - this is too strict, and more leeway should be given for the clinician to exercise a little clinical judgement (as we used to be able to).

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

All the other regulations and necessary to protect the public, although I would like to see the GOC try to enforce the rules around supply of contact lenses [redacted] supplying to UK patients.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage - obviously more mistakes if a verification stage is removed. This results in more patients being given the incorrect lenses.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Aftercare should check acuity, prescription, fit, eye health and how the patient wears them (to make sure they wear them safely and avoid unnecessary risks to their eye health)

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Patients who buy zero powered contact lenses in non-clinical settings are often not educated in how to get them in and out and how to care for their eyes and the lenses - this results in more eye infections and visits to eye hospital casualty as they can't get their lenses out

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Patients who buy zero powered contact lenses in none clinical settings are often not educated in how to get them in and out and how to care for their eyes and the lenses - this results in more eye infections and visits to eye hospital casualty as they can't get their lenses out

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Patients who buy zero powered contact lenses in none clinical settings are often not educated in how to get them in and out and how to care for their eyes and the lenses - this results in more eye infections and visits to eye hospital casualty as they can't get their lenses out

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no disadvantage - the regulations are sensible to protect public health

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

NA

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

NA

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

poorly made (insufficient or poor quality measurements) can cause adverse ocular problems

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

2 years is a reasonable interval to check your prescription hasn't changed

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

disadvantage - more people walking around with an old prescription. this causes less clear vision / eye strain and nobody will have checked if they are legal to drive.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The only disadvantage is occasional minor inconvenience to the patient - small price to pay

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Not being able to send out contact lenses for under 16s from the supplier is a pain

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

U16s could receive their contact lenses through the post from the supplier

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

not too much of a problem

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

NA

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The glaucoma care schemes/ MECS/ CUES schemes are new and relevant to the GOC.

Some mention of how ophthalmologists and optoms can work together to reduce the burden on the NHS & the regulations around this would be useful

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Remote care for eyes does not work well. I have personal experience (and have spoken to many colleagues with the same experience) remote care did not work well in the pandemic - it involves too many assumptions and guesses - never good for clinical care.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

NA - at this stage no technology which would be of benefit to the patient, only tech which could save a business money - this should not be the a driver for the GOC especially when it compromises patient care and public health

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

remote care should only be used in pandemics

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

NA

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

NA

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

NA

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think you are right to look to the future and try to make sure regulations don't inhibit progression of technology and the use of it (I am a big fan of new tech) but remote consultations have no place in eye care unless there is a pandemic - it's just a shameful way to try to save money at the expenses of patient care and public health

Further information

56 Can we publish your response?

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Testing of Sight

Eye health assessment

Contact Lens fitting / prescribing / aftercare (plano or prescription)

Dispensing optical appliances to Children (U16)

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Testing of Sight

Eye health assessment

Contact Lens fitting / prescribing / aftercare (plano or prescription)

Dispensing optical appliances to Children (U16)

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Prescribing of plano prisms. Non registrants appear to be advertising this service to both adults AND CHILDREN. I wonder if they think they can get away with this because they are plano prisms? To my mind as an Optometrist a plano prism is most definitely an optical appliance, and one that used incorrectly can cause harm to a child's visual development.

Myopia management should in my view be under the supervision of an Optometrist not just a Dispensing Optician, as best practice dictates that the patient requires binocular vision assessment as well as refraction and probably cycloplegic refraction too.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Behavioural Optometry

In countries such as the USA & Canada, where this is a more established eye care practice, I believe registration is required for this enhanced eye care service. In the UK it seems that aside from voluntary registration with an organisation such as BABO anyone can claim a speciality without necessarily having the training, accreditation or expertise to back this up. As with dispensing plano prisms this exposes patients to risk of harm.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

I think unless the GOC can regulate online ordering / supply coming into the UK all you do is over burden the UK optical practices.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

There is the risk of adding financial burden to UK optometry practices when the bigger picture is that the risk to patients comes from online optical appliance sales.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

This depends on what additional powers the GOC would require, is seeking and the effect these would have. Adding further burden to UK registered businesses where the issue is not being able to regulate overseas or online businesses would be counter productive.

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

My feeling on this is that adding another layer of regulation will adversely impact, both in terms of financial costs and time pressures, the smaller optical practices and have minimal if any impact on the larger online retailers.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

No. Refraction is so much more than just checking the prescription for glasses (or contact lenses). I have worked with, and employed Dispensing Opticians for over 22 years, almost all of whom have been brilliant at what they do. Unless they are trained in binocular vision, ophthalmoscopy, ocular side effects of systemic medications, detecting signs of systemic and ocular diseases the risk to the public is that members of the public receive a lower standard of care than they currently receive from an Optometrist.

With the knowledge that the GOC has, and the mandate to uphold standards for the benefit of both the public and practitioners I cannot see how delivering a lower standard of care benefits anyone in the medium to long term.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

With the knowledge that the GOC has, and the mandate to uphold standards for the benefit of both the public and practitioners I cannot see how delivering a lower standard of care benefits anyone in the medium to long term.

Separating the refraction from the sight test is not in the public's interests. If a patient has mildly reduced vision, is it amblyopia, an early macula disease, cataract, corneal opacity/dystrophy, keratoconus or just the incorrect refraction? I don't believe it is fair to the patient or a Dispensing Optician to expect them to be able to know all of this.

As far as I can tell, it is now easier than ever before for a Dispensing Optician to re-train / upskill to an Optometrist. Surely this is a far better solution than potentially reducing the care and quality the patient receives.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I think the current legislation protects the patient's best interests, even if the patient may feel regulation is unnecessary, they are often not fully aware of the bigger picture and the benefits medium to long term from having a registered OO or CLO provide their contact lens care.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protection of the public.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Patients who lack capacity.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient's who lack capacity will benefit from the care provided by having their optical appliances dispensed by a suitable qualified and experienced registrant.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

As far as I can tell, anyone who wants to can buy contact lenses without needing a prescription can and does freely. I think the boat has sailed on this one. The online companies who want to circumvent any regulations on the sale or supply of contact lenses already do so.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

As far as I can tell, anyone who wants to can buy contact lenses without needing a prescription can and does freely. I think the boat has sailed on this one. The online companies who want to circumvent any regulations on the sale or supply of contact lenses already do so.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

As far as I can tell, anyone who wants to can buy contact lenses without needing a prescription can and does freely. I think the boat has sailed on this one. The online companies who want to circumvent any regulations on the sale or supply of contact lenses already do so.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As far as I can tell, anyone who wants to can buy contact lenses without needing a prescription can and does freely. I think the boat has sailed on this one. The online companies who want to circumvent any regulations on the sale or supply of contact lenses already do so.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Probably broadly in line with the requirements of testing of sight.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

As far as I can tell, anyone who wants to can buy contact lenses without needing a prescription can and does freely. I think the boat has sailed on this one. The online companies who want to circumvent any regulations on the sale or supply of contact lenses already do so.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

As far as I can tell, anyone who wants to can buy contact lenses without needing a prescription can and does freely. I think the boat has sailed on this one. The online companies who want to circumvent any regulations on the sale or supply of contact lenses already do so.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Patients who buy novelty / zero powered contacts in my experience tend to be the least likely to seek professional advice or support unless they experience a significant adverse event.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protecting the eye health of the public.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The market is free enough already. Patients have a wealth of choice, the recent drop in price of high street optical appliances surely give patients access to the lowest prices they have ever had.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

The number of ocular conditions such as glaucoma detected would surely increase over the years, not immediately, but over a decade or two the eye health of the general public would suffer.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

This is in a way a silent but significant health benefit to patients / the public at large, that they won't realise they need until it's too late if this is withdrawn.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

In my clinics the highest level of preventable sight loss is amongst adult patients who buy glasses without a prescription (and therefore eye care as well) and only seek professional advice by the time they have a significant loss of vision. Glaucoma is a common finding in this group, along with cataracts reducing vision below the legal standard for driving and also macula denegation once the second eye is affected.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Providing patients with an eye health check every two years, which they need but often don't appreciate the benefit of until they've had it.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Sports have a higher risk of injury to patients, which can be life changing, particularly for young people. The legislation protects young people from the risk of harm.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The potential cost savings need to be balanced against the risk of injury from incorrect optical appliances. The data likely to support this will only become available once a number of young people suffer sight loss from incorrect optical appliance provision.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The fact that you can buy a product online from an unregulated market and have this delivered to the UK is no doubt beyond the reasonable level of regulation the GOC can enforce.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

No. Most of us, if given the chance to save time or money will do. The risk is that most people don't understand the medium to long term risks when it comes to their eye health and vision. The best I can do is to try and educate the few who ask me to enable them to make an informed decision on this.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Testing sight, contact lens fitting/aftercare, dispensing of glasses to restricted groups

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Testing sight, contact lens fitting/aftercare, dispensing of glasses to restricted groups

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction is a major element of the sight test. In conjunction with the rest of the sight test, it can indicate the overall health of the eye. It is imperative that the optometrist is conducting this part of the test and can then interpret the results relative to the rest of the test,

Indeed many patients only come in if they want new glasses. There have been numerous instances over the years where I have picked up pathology for such patients. Separating the refraction from the health check, risks devaluing the rest of the sight test in the eyes of the patients.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Refraction is a major element of the sight test. In conjunction with the rest of the sight test, it can indicate the overall health of the eye. It is imperative that the optometrist is conducting this part of the test and can then interpret the results relative to the rest of the test,

Indeed many patients only come in if they want new glasses. There have been numerous instances over the years where I have picked up pathology for such patients. Separating the refraction from the health check, risks devaluing the rest of the sight test in the eyes of the patients.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better for the patient to have everything done together with one person responsible.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

-

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

-

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Ensuring proper aftercare of CL Patients

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Deal with any CL-related problems for Px

Provide ocular healthcare for CL Px

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

-

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

-

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

-

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

-

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

-

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

-

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

-

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

-

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

-

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted
]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Testing sight

Fitting contact lenses of any kind

Dispensing spectacles to children and partially sighted patients

Basic refraction tests

Giving advice about topics that they're are not sufficiently trained or knowledgeable

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sight testing

Children's dispensing

Dispensing to impaired patients of all types, physical and mental

Fitting ALL contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not Answered

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Dementia,
Mental illness
Learning difficulties

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients being cared for by a regulated person

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage of missed pathology

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Supply of contact lenses, that should include Plano CL too.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Supply of clear and colour contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

On line supply of CL, so many px are coming to us with issues after wearing on-line CL

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above
and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Refraction for glasses by CLO, as CLO already doing refraction/Over refraction.

Minor eye condition and glaucoma refinement referrals. ABDO started this service Mecs and GRR and so many CLO showed interest in it and passed all the necessary exams and achieved necessary skills and qualifications, however can't practice in a high street optician as a qualified CUES practitioner, because GOC doesn't allow us to. Unfortunately by not practicing in a day to day practice these skills are fading away.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

CLO doing refraction and involved in CUES services will take unnecessary pressure off on HES and optometrist colleagues.

More DO will be interested in CLO qualifications as they will be able to see progression after being a CLO will be able to work in hospital environment.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Any activity that can impact on a persons sight. Thus dispensing of glasses, particularly progressive lenses. If these are bought online without the correct measurements and fitting, they can lead to issues, some more that others.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Invasive surgery

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

There needs to be postgraduate qualifications that permit advanced techniques. These qualifications need to be agreed upon and recognised by other professional bodies such as the Royal College of Ophthalmologists as well as GPs to carry out advanced techniques such as intravitreal injections, SLT, Iridotomies etc in a community setting. However, at the present time, all these activities are restricted to those working in the hospital setting alone and the qualifications set out by the College of Optometrists such as in glaucoma and medical retina, are not fully understood by the average ophthalmologist in local HES. So many of these activities are restricted but there needs to be a method to allow optoms to carry them out with the right qualifications.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

I say no but what I mean is that postgraduate qualifications such as in glaucoma (levels 1,2 and 3) should be accepted by ophthalmologists so that local agreements can then be arrived at in which optometrists can carry out techniques such as SLT in the community.

In my experience of having spoken to ophthalmologists about the College of Optometrists qualifications, they have not even heard of them and do not have confidence in optometrists with these qualifications to get involved in extended roles in the community (ie outside of HES).

Therefore any qualification, whether they are registered by the GOC or not, must have the full backing of ophthalmologists so that optometrists can use these qualifications to carry out advanced techniques in the community (outside of HES) with a clear syetem of payments otherwise there is no benefit in these qualifications, regardless of who registers them.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

Refraction and the health of the eyes is one simple entity. It cannot be broken into two separate activities. How we see is determined by our refractive status as well as the health of our eyes. Many times people can see very well but only a full sight test will uncover problems such as diabetic retinopathy and these would be missed if we separate the two functions of refraction and eye health check.

However, a refraction carried out as a delegated function by an appropriately qualified dispenser and a eye health examination carried out by an optometrist including a review of the refraction results would be fine.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality,

diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

see above. Biggest disadvantage of separating the sight test into two separate functions is the missing of pathology in an otherwise normal looking eye.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

the opticians act states

"such additional examinations as appear to the doctor or optician to be clinically necessary"

This part of the act is seriously problematic as it means optometrists need to carry out an exhaustive list of test all within the same sight test fee.

This needs to be amended so that only refraction and an intraocular exam is required in the sight test. All additional tests such as fields tests, IOP measurements, repeat tests, dilation, cycloplegic examinations, gonioscopy, OCT, fundus imaging, keratometer measurements etc, all need to be classed as additional examinations and paid for separately.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

By keeping the statement

"such additional examinations as appear to the doctor or optician to be clinically necessary"

as it is as part of the definition of what a sight test is then more and more practices will stop providing NHS exams as it is simply not possible to provide all these additional examinations for free.

By taking this statement out and requiring optometrists to refer a patient that needs these additional examinations to themselves or another optometrist for further investigations for an additional fee, would be in the best interests of the patients. At the present time, optometrists will either simply not do these additional examinations but simply refer them to HES, which will increase pressure on HES, or they will just not engage in NHS work. In either case, this would be a bad result for the patient.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A qualified person must be the only one to fit contact lenses as the case presently

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not Answered

Please explain which group(s), give your reasons and provide any evidence to support these.:

Yes. We have so many patients turn up for a CUES appointment with red and painful eyes having bought their contact lenses from the internet. These patients cannot be seen under the CUES scheme and cannot go to the practice they bought them from as this was online. So all these patients are currently going to A&E clogging up the system and getting free treatment. This should be the responsibility of the internet suppliers. A charge should be built into the purchase price of these online lenses that covers their after care should they end up with a red eye which they most frequently will do. This charge should be paid as a tax to and directed to the HES to cover the cost of treating these patients who buy their contact lenses online.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

as explained above

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

If it became easier to buy online then there would be a surge in red eyes and patients with corneal ulcers visiting A&E. Who will cover the cost of this additional treatment for these people? Need an online tax for this

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Less people ending up in casualty

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Without an aftercare element, internet providers are not being held accountable for the sale of their lenses. They can sell them cheap as they have no responsibility for the care their patients. There is no way to enforce a system of aftercare provision for online retailers. The simplest solution is an online tax for the activity that must be paid for with each purchase.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

These are still devices that can cause serious harm to the eyes and should be regulated in the same way.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

see above.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Without enforceable legislation, patients will continue to block up A&E. Only solution as already mentioned is an online tax specifically for the after care or paid to optometrists to manage these online patients via a system such as CUES

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

More people ending up in casualty with red eyes

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

not sure

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

not sure

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

a prescription needs to be dispensed. This requires an understanding of the nature of the prescription and is not the same as simply "selling" glasses. If the prescription is not dispensed with the most appropriate lenses then this could lead to injury or harm to the patient

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

The health of a patients eyes could have changed in that time

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This would necessitate a regular eye health check just like a dental or other general health check which would ultimately benefit the patient.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Current system ensures patient safety

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

not sure

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

not sure

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

not sure

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

I think the sale of progressive lenses should not be allowed online as these require considerable skill and accuracy of measurements to dispense

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Without the correct measurements it could lead to increased falls and accidents

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I have read a research paper in which telemedicine carried out by optometrists over the lockdown period was examined and it the results were not positive.

The research paper was:

A prospective evaluation of the clinical safety and effectiveness of a COVID-19 Urgent Eyecare Service across five areas in England

Conclusion was:

The present study found that a virtual assessment service providing optometrist tele-consultations was not effective at resolving patients' acute-onset eye problems. The range and number of pathologies missed by tele-consultations suggests that the service model in the present study was detrimental to patient safety.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

More guidance is needed in managing various conditions remotely

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The above research paper outlines these gaps

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

The above research paper outlines these.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

progressive lenses and contact lens after care need more clearer rules

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

As mentioned before, progressive lenses should not be permitted for online sales.

There should be an online tax added to each sale of contact lens which can be used to pay for the inevitable contact lens related complications either by HES or by optometrists via a scheme such as CUES

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Clear rules that allow appropriately qualified optometrists to carry out advanced techniques within the community ie outside HES eg

1. Intravitreal injections
2. SLT
3. Iridotomies
4. Iridoplasty
5. Removal of chalazion

etc.

At the present time, the many ophthalmologists do not understand what the College of Optometrists postgraduate qualifications are and what competencies they develop. Ophthalmologists do not have confidence in these qualifications, even though some have been agreed upon by the Royal

College of Ophthalmologists.

Therefore legislation that clearly defines who can carry out these procedures within the community and what the appropriate qualifications should be would greatly help to increase confidence in optometrists trained with these skills.

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think there should be a doctor of optometry qualification that is similar to that of dentists. This title should be given to those optometrists who have achieved a number of postgraduate qualifications offered by the College of Optometrists, which incidentally requires extensive hospital experience, and this should be agreed upon by the Royal College of Ophthalmologists so that ophthalmologists have confidence in this.

At the present time there are 4 areas that have been agreed upon:

1. Glaucoma
2. Medical Retina
3. Cataracts
4. Acute and Emergency Eye Care

Each of these 4 have 3 levels.

The college of optometrists only has qualifications in 2 of these with glaucoma having all 3 levels that lead to a diploma and medical retina at 2 levels.

I think the College of Optometrists needs to set out the structure for all 4 of these at all 3 levels. We could then have any optometrist who has completed:

1. Independent Prescribing
2. Any 2 of the above 4 to a diploma level (ie level 3)
3. The remaining 2 at level 2

to be given the title Doctor of Optometry, a qualification that would be recognised nationally and not being specific to one university, as is the case at the present time and one for which there is full funding from the NHS for the procedures that would be carried out.

Having regulations for this standard of training would greatly help to improve patient care in the community as well as removing enormous pressure from HES and GPS. This would also standardise the training for optometrists to this level, much in the same way that the current professional qualifying exams for optometrists do, leading to a consistent and high level of community service that would be convenient for patients and save the NHS much funds

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Many points already mentioned.

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above
and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Not Answered

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Not Answered

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

over 13 being able to have online sunspecs

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

sight test recalls extended to three years

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

sight testing recalls extended

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not Answered

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Eye exam / refraction

Dispense under 16

Fit contact lenses

Mecs/cues

Supervision of students/pre reg

Supervision of delegated tasks

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye exam/refraction

Contact lens fitting

Contact lens aftercare

Supervision of students/pre reg

Supervision of delegated tasks

Dispense or supervision of u16

Mecs/cues

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dispensing to vulnerable groups
Myopia management

Both take more specialist knowledge

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not Answered

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Not Answered

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

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Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Not Answered

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

People with learning difficulties and dementia have different needs

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

To ensure everyone gets the care they deserve without the risk of being taken advantage off, financially and otherwise

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not Answered

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

People could purchase the wrong lenses, or not be given instructions on insertion and removal, or proper aftercare.
Risk of infection or serious damage increases

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

Poor fitting lenses,
No insertion and removal instructions
No wearing and caring guidelines given
No aftercare

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not Answered

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not Answered

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

As per now the testing of sight etc should all remain protected, one of the great things about optometry in the uk is that the testing of sight is done only by qualified optometrists which means the public benefit by having a thorough eye health check every time their sight is tested and in the UK without this many many eye conditions like glaucoma would go undetected as there is no other way that the public is screened for such conditions. Much of the pathology that is detected, referred and treated is through asymptomatic screening and regular checkups.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The uk has a well functioning, safe, accessible and efficient eye care service and all the activities that are currently restricted to registrants must continue to be so as this ensures that the public receives comprehensive eye examinations from the appropriately qualified individuals.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Inspections would be well received as some of the dangerous practices such as ghost clinics and other practices that can put the public at risk would be experienced first hand and it would give the GOC a better insight into the commercial influence/pressures that registrants face which would help scope better future policies and guidelines.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

No. It is the GOC's job to protect the public and such a move would be contrary to that function.

I and many of my colleagues refract patients first before examining eye health as the refraction, how patients respond to questions during the refraction can give strong cues as to the sorts of pathology that maybe present. For example a patient may complain of the words in the centre of their vision being blurred or missing which would direct us to put more emphasis on examining the macula & other patients may perceive a colour difference when viewing the chart between eyes & this could indicate presence of cataracts or optic nerve pathology. The way a patient responds to the questions asked during the subjective refraction, how much time they take to respond, the level of difficulty someone is having reading a line of acuity, ALL of these things build a picture in the Optometrists mind as to what sort of pathology could be present & what to look for. If the refraction had been delegated all of these safety critical cues could be overlooked by someone who is not also trained to examine and look for disease like the Optometrist is & this would be of huge detriment to the patient.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Separating the refraction from the health check is only of detriment to the safety of the public. As i outlined above the refraction, the responses a patient gives during this process & other observations that are made both by the patient and Optometrist during this process help shape the remainder of the eye examination and it is an integral part of the examination process and cannot be treated in isolation without huge risk to the public. A D.O carrying out the refraction and treating these results in isolation would lead to poorer prescribing, often what we prescribe will be influenced by the OMB status /history and eye health observations also and CANNOT be done safely in isolation

Apart from the possible benefits to the commercial corporations in training D.O's to refract as a cheaper form of labour I cannot see any benefits to anyone else. it certainly is not in the best interests of maintaining public safety or in the best interests of maintaining standards within the profession.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The main advantage would be that we would continue with what is a safe and efficient delivery of primary eye care services. The best part of optometry in the uk is that the testing of sight is linked directly to the checking of ocular health & for the huge benefit of the public this must remain linked. Separation of these 2 would create an unnecessary and avoidable significant risk.

I have seen patients who have previously only had refractions in countries like india and I have often gone onto find pathology which has been undetected previously as they simply opted to have a refraction to buy glasses whilst in india and " no one checked their eye health". If we were to change the sight testing legislation it would be a huge step in the wrong direction! Especially in such economic times, many patients may choose just to have a refraction which would in the long term have a hugely negative impact on the populations eye health if conditions like glaucoma go undetected for longer, get picked up later when they are harder to treat and have become established. We should be looking at ways to improve our service delivery, not move backwards to put the public at risk when there is no need and certainly no strong evidence for change.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

NO but my own opinion is that a significant portion are referred and more when the patient is seen by an optometrist who is more knowledgeable, the more conditions we know about and more of their signs the better we can look for early signs of disease and manage or refer on appropriately. Without having eye health and refraction linked together so much more pathology would go undetected. I can say for sure in my experience MOST of the referrals for conditions like glaucoma come out of routine exams where the patient is completely unaware that they have a problem and with such conditions they do not produce symptoms until is far too late and this is why the current model of a comprehensive eye test with refraction and eye health check done by the SAME optometrist is key to safe eyecare for the public.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We would continue to provide a safe fitting and aftercare procedure which is working well at present, no strong evidence for change in my experience

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

Current groups are sufficient

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

To do this would put millions in our population at risk as contacts are a medical device and often we see the detrimental impacts on eye health of patients who buy and are supplied with contacts from companies abroad who dont comply with uk legislation. I have seen many such patients who have ended up with scarring of corneas and other complications as they were supplied with contacts WITHOUT fitting or regular aftercare. Such a change in legislation would ONLY be harmful for patients and the wider public

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Apart from speeding up the supply of CL SPEC there is no benefit but the main benefit of keeping it as it is now is that EACH SPEC is checked, I for example will check all details are correct and ensure the spec/rx makes sense based on the checkups findings and all of this diligence BEFORE verifying means a much more safer process to protect the public.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Minimum checks such as history, asking about any problems, vision, CL fitting check, anterior eye health check and FLU assessment also

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

I have often seen patients, especially young girls who have bought such contacts in shops and been wearing unsupervised, these are often poor quality low dk contacts and such patients have been found to have corneal neovascularization and other complications. Such cases would become commonplace if the requirements changed

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Please see above, to protect the public's eye health, to ensure these medical devices are fit for the patient and do not damage their eye health

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Without this many of the patients who have their eye health checked as part of our current comprehensive eye care model would not have this done, this would lead to more undetected pathology and an ever more increasing burden of poor eye health on the NHS which is already struggling.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages would be NO regular eye health screening and MUCH MORE undetected eye disease which is only picked up often because the patient needs to have an eye test to purchase new spectacles

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A brilliant SAFE model which ensures eye health is checked on every sight test and the patient receives the best eyecare. Without the current model many more patients would lose their sight, it would be a move in the backward direction

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes - a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

An example is telemedicine and I have heard from friends that many conditions were missed by Gps during the pandemic as patients were NOT seen in practice. For triaging purposes or history taking doing such things over technology phones etc is fine but not for examining eye health etc or conducting sight tests

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Consultations
Contact lens fitting
Dispensing of any optical aids

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Any form of eye care consultations

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Selling optical appliances to adults should also be restricted

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

There is a noted increased need for low vision services linked to increasing access to these services as dictated by the IAPB; registers of low vision practitioners should be made so the visually impaired public that needs such practitioners can easily find them.

Same applies to specialist contact lens practitioners fitting hard lenses as these are not services readily available in every optometric practice.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Very important part of a sight test is the health check; just refraction will mean one can go a long time without the ocular health check which could be of negative consequences in the event pathology develops.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Negative-once refracted patients won't look for the ocular health check.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It's not unnecessary; it's important for safety

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Continued safe practice of contact lens use in the public; a lot can go wrong easily with contact lenses only trained professionals should be fitting and dispensing these

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Geriatric patients; they already have a lot going on and the last thing they should worry about in addition to other health problems is whether they are wearing a correct pair of glasses

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Equality-improved access to care

Inclusion-be it from an old people home or their own houses they can be guaranteed to be seen by appropriately trained professionals that dispense the correct spectacles or low vision devices to them.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Uncontrolled use of contact lenses can lead to blinding conditions.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

They are necessary

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing of devices to people without a health check-dangerous practice

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Routine care connected to the use of contact lenses for all contact lens users

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Mere fact that a foreign body will be repeatedly placed on the eye comes with increased risk/threat to good ocular health which should be monitored and the risks mitigated

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Good ocular health for all

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It guarantees an ocular exam happens routinely

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage-missed ocular health check opportunities and patients can't always tell when the prescription is now too strong/too weak for them.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Routine ocular health check opportunities and use of updated prescriptions for best visual performance

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It's important to ensure correct materials are used for different visual aids-some introduce more harm than offer the safety they should

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Continued safety for children using optical appliances in sport.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Telemedicine for emergencies increases access to crucial care in challenging times

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Increased access to care and inclusion of marginalised societies

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/a

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/a

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Some of the procedures and prescriptions coming under IP are widely taught in the undergrad programmes. It's important that the GOC acknowledges this shift to include diagnostics in undergrad programs and scope of practice is amended to reflect these changes

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

refraction, ophthalmoscopy, contact lens fitting/assessments and contact lens checks.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

refraction, ophthalmoscopy, contact lens fitting/assessments and contact lens checks.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Clinic Management, unfortunately the reality in most practices is that the clinic is managed to maximise revenue rather than patient care and staff well being. Walk-ins are often booked without checking with the optometrist whether it is feasible, clinics are often overbooked and include ghost clinics and testing times are often squeezed to the bare minimum. This results in poorer patient care and poor staff well being. It's unfortunate that the GOC pay no attention to this or do not seem to anyway.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Yes the GOC should inspect and scrutinise business owners to ensure they are providing the best patient care and are not cutting corners simply to drive profits. Basic things like having adequate equipment that works, sufficient clinic times, well trained staff and ensure lies and deceit are not used when selling to patients.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Dispensing opticians without knowing the individual's circumstances and the health of the patient's eyes will not be able to carry out the best possible refraction and advice that is needed for optimum patient care. Also this move would only benefit business owners and not the patient in any way. The business owners will be able to see more volume with less staff and that's all they're interested in. Why would a patient want to be seen by two separate staff members for refraction and then ophthalmoscopy. This is counterproductive and not in the patient's best interest. There are many occasions where a refraction needs to be tailored due to ocular health or patient history and this can only be done effectively if this is all done by one individual. It is unfortunate that the GOC are considering this change and only puts doubt into how the GOC is run and who they are trying to benefit.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

advantages: None for patients or staff - the only advantage would be for business owners and increasing their profits.

Disadvantages: Poorer quality patient care, less tailored service, less knowledgeable staff carrying out refraction.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The current legislation that allows only optometrists or RMP to carry out refractions is in the patient's best interest and provides the best care.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The current legislation works well. It ensures the refractions is done by a knowledgeable and well trained professional who understands the patients health of the eyes and can tailor the refraction to best suit the patient taking all this into account.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

The only data I have is my experience and I have seen optical assistants and dispensing opticians with terrible patient care. These types of individuals only care about selling and no care for the patient.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

An understanding of ocular health is very important for this. Allowing unqualified staff to fit contact lenses is unwise.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It allows knowledgeable professionals who understand ocular health to best assess and fit patients with contact lenses ultimately proving the best care to the patient.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

It works well to protect the patient

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

yes, allowing less knowledgeable staff to make key decisions will reduce patient care

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

it works well as it is

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

it works well to protect the patient

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

if sold without restrictions and proper advice/care, risks of CL related issues could increase

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

it will ensure patients are cared for in the best way possible and reduce the risk of avoidable CL related eye issues

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

patients could end up with incorrect lenses

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

it protects patients from being dispensed incorrect spectacles.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

they could be dispensed the wrong appliance with incorrect lenses/measurements and can easily be victim of overselling

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It protects patient's from the disadvantaged mentioned above

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

The sale of online spectacles and contact lenses needs to be regulated by the GOC to the same standard as practices are. Patients often come in with hypoxia and other issues related to low Dk/T lenses purchased online with no checks of advice from registered professionals. Also incorrectly dispensed spectacles are very common and this can create a big issue for example for drivers where incorrect measurements can lead to unwanted induced prism and aberrations. It's bizarre that on the high street patients are protected yet the online retailers are free to do as they please with no duty or responsibility. of patient care.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If online retailers are regulated just as high street practices are it ensures patients are protected no matter where they choose to purchase their spectacles.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Certain machines trialled by [redacted] called [redacted] where essentially an OA is doing refraction and the optometrist is asked to sign the prescription given by this machine. I have worked with this machine for a long time and have found the refractions if often far off what it should be and this risks patients being given incorrect spectacles. This needs to be regulated and addressed. I have done many remote care contact lenses end of trials and it is not at all in the best interest for patient care where vision, ocular health and contact lens fitting cannot be seen in person.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I have done many remote care contact lenses end of trials and it is not at all in the best interest for patient care where vision, ocular health and contact lens fitting cannot be seen in person.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Certain machines trialled by [redacted] called [redacted] where essentially an OA is doing refraction and the optometrist is asked to sign the prescription given by this machine. I have worked with this machine for a long time and have found the refractions if often far off what it should be and this risks patients being given incorrect spectacles. This needs to be regulated and addressed. I have done many remote care contact lenses end of trials and it is not at all in the best interest for patient care where vision, ocular health and contact lens fitting cannot be seen in person. I have done many remote care contact lenses end of trials and it is not at all in the best interest for patient care where vision, ocular health and contact lens fitting cannot be seen in person.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

ensure all technology is thoroughly tested to ensure it is providing better patient care rather than an excuse for practices to reduces testing time while compromising on patient care.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The sale of online spectacles and contact lenses needs to be regulated by the GOC to the same standard as practices are. Patients often come in with hypoxia and other issues related to low Dk/T lenses purchased online with no checks of advice from registered professionals. Also incorrectly dispensed spectacles are very common and this can create a big issue for drivers where incorrect measurements can lead to unwanted induced prism and aberrations. It's bizarre that on the high street patients are protected yet the online retailers are free to do as they please with no duty or responsibility. of patient care. If online retailers are regulated just as high street practices are it ensures patients are protected no matter where they choose to purchase their spectacles.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

regulate online retailers and high street retailers in the same way to ensure patient care is consistent and the best it can be wherever the patient chooses to purchase spectacles or contact lenses.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Regulations needs to be set for practices and not just registrants. Practices very often abuse patient's trust and compromise care simply to drive volume and profits.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Fitting and supply of spectacles to children .
Fitting and supply of contact lenses.
Refraction .

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Performing eye examinations, fitting and supply of contact lenses.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

The eye examination should not be broken down into further stages. We already have pre tests being done by unqualified staff. We should insist on the whole eye examination being conducted ONLY by a fully qualified optometrist.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

There is no advantage other than the big multiple high street opticians pocketing more profit.

The disadvantages are the eye examination. Will be broken up accordingly and there will be no link between possible pathology and refraction - only one person should be allowed to conduct all tests in order to fulfill complete analysis of the individual patient needs.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We should not be referring to health care as financial - it obviously makes an outcome for a lot of people but to allow dispensing opticians to conduct a refraction is purely for only financial gain and corporate greed.

The sight testing legislation must remain as it is in order to not tarnish the industry anymore than what it has due to the influence of the multiple high street opticians. Optometrists work hard to gain their qualifications in order to conduct eye examinations - to deregulate such a profession would be gross injustice to all the optometry students of past present and the future!

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would mean that the general public could rely on being fitted and supplied contact lenses by fully qualified professionals - what more could you ask for when it comes to health care!!!

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

It's not rocket science your opening up a ticking time bomb. Prescription contact lenses sales only to be supplied by a qualified professional forever!

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No they don't because it means the patient is receiving the correct lenses as it has gone through a fully qualified individual before being supplied. It's the only way of verification to a GOLD STANDARD!

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There would be more be a severe increase in the wrong possible information being released to the patient. This cannot be allowed to happen.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

To assess the current wearing schedule of a present contact lens wearer.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

More chance of severe corneal infections if this is allowed to happen!

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

The patient would know the full implications of the risks taken by wearing such contact lenses

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There's not a massive market for zero powered contact lenses as what there used to be so financially I don't think there's massive gains to be made of legislation changed.

The main advantage of legislation remains as it is that the patient is getting the full picture of all the potential scenarios if they chose to wear such contact lenses.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Of course it is as if it is not there we allow patients not consumers to possibly get certain ocular pathology that could have been easily avoided.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

No as it makes sure the patient is more likely to be wearing the most up to date prescription which is only for their benefit.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage would be that the prescription could have changed and they are not as aware of the change and could lead to possible legal cases for example in a road accident where the perpetrator was not seeing to the required dvlA regulations.

The advantage is obviously the opposite to what I have stated above!

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages are the general public can rest assured that every spectacle wearer is seeing to the most up to date prescription as possible. The ones who are not would only be of their own choice.

There's no disadvantages as far as I can see.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Parents have told me they would always want to make sure the supply of sportswear to their children was overseen by an optometrist!

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Only advantage is they can buy them straightaway. The disadvantage is they don't know if what they are buying is appropriate for their individual needs.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage is the profession would stand up a lot more professionally in they eyes of the general public.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

N/a

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

N/a

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

N/a

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

N/a

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/a

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The optical measurements for spectacles such as pupil distance and heights should only be performed by a fully qualified professional. I have had lots of patients come in to practice after purchasing online spectacles that were inadequate for their needs due to incorrect measurements taking place in the glazing of spectacles.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Not really sure.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

N/a

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

N/a

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

N/a

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

N/a

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Everything that is restricted at the moment

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Just as it is currently

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Aftercares
Teaches
Visual Fields
Pressure test

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

High risk of infection, prior eye conditions which may lead to more eye health problems.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Lead to more detrimental eye health conditions if not regulated properly and checked thoroughly by fully qualified optometrists

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Decline in quality of vision, could affect and cause serious problems i.e. with driving and safety etc

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financial impact should not be an issue within optics. The first port of call should be the patients well-being and health, especially of the eyes. The fact that financial is even a factor in changing regulations is ludicrous. To whom do we owe our allegiance too, the businesses or the public?

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

The consultation is too broad and risks deregulation due to the current governments ideology rather than patient safety

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

I do not believe anything should be deregulated. Clearly there was a lot of thought put into the 1989 act by a government hell bent on deregulation and even they wouldn't go further due to the risk to patient safety. I do not believe that the risk profile has altered since then. The only thing that should be done is to close any loopholes e.g. remote supervision of sight testing, supply of plano coloured contact lenses, contact lens supply from abroad without prescription etc. Also the body responsible for pursuing breaches shouldn't be the GOC, or at the very least the GOC shouldn't be prevented from pursuing individuals and companies through the courts due to finance concerns.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

the same as now. I do not see any need for more or less regulation apart from the closing of loopholes

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

None come to mind

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

The GOC should have the right to regulate new skills that may come into being due to advancements in technology

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

Most businesses are ethical but it is unethical to set commercial targets for optometrists that link to the sale of spectacles or how quickly a patient should be seen. Frankly its a black mark against the GOC that they do not properly prevent this.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Most businesses operate within regulations but some get away with breaches for years which gives an unfair and unethical advantage to those businesses and puts patients at risk.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

There are many subtle clues to pathology that can become apparent to an experienced optometrist while refracting that cannot be taught

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

see answer to 15

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I do not see any obvious disadvantages to keeping as is. Deregulation would make it easier to exploit those who may have financial issues or other hard to reach demographics

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

In fact loopholes in current regulation around plano coloured lenses and supply of contact lenses from overseas but with a UK fulfilment centre without a valid prescription but patients at risk

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

it does disadvantage poorer people BUT they would otherwise be at risk

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

There is definitely an argument for extending to vulnerable adults e.g. dementia but I can't think of a mechanism that doesn't result in complaints from those who think they aren't or complaints where someone is not identified.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

the advantage is that those vulnerable adults wouldn't be taken advantage of and would have optical appliances better suited to them

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

In fact loopholes put the public at risk of sight threatening eye disease

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

would put the public at risk of sight threatening eye disease

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

would put the public at risk of sight threatening eye disease

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

would put the public at risk of sight threatening eye disease

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Taking history necessary for a contact lens aftercare. Assessment of the acuity with contact lens. Assessment of any change needed to the prescription of the contact lens typically by over-refraction. Verification of suitability of the fit of contact lenses. Examination of the anterior eye including lids to determine any pathology, or adverse effects of contact lenses. Issuing advice regarding wear and contact lens care. Effecting any change in the parameters of the contact lenses as a result of examination.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

the barriers are necessary for patient eye health

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

The risk of harm is greater due to the fact these are delivered in a fashion environment with the same perceived risk as wearing different shoes

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

As well as legislation the GOC needs to be able to pursue suppliers without a financial risk to them, perhaps via criminal charges/Crown Prosecution Service

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

see answers above

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

n/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Contact lens sale and supply

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

I find it amazing that you need to ask this question. The whole point of requiring an internal and external examination when prescribing is to ensure there is no sight or even life threatening pathology. If you allow the supply of spectacles beyond 2 years you weaken the protection of the public potentially catastrophically

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

see above

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unregistered suppliers are in no position at all and have no professional responsibility or jeopardy when making a judgement about supply beyond 2 years. IT IS A CLINICAL JUDGEMENT not a commercial decision.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

The risks are greater with sportswear as the risk of poor fitting causing injury in higher risk environments

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

see above

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I do not consider the reduction in availability or increase in cost of appliances to be a reason to put young people in jeopardy

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Public protection is served by keeping as now

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

With suitable regulation that does not relax or reduce patient care. Optometrist must be on site, remote supervision is unacceptable. If it were why have has there ALWAYS been a requirement for supervisor to be present for pre-registration students? there must always be the possibility for the optometrist to intervene in person.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

There is a possible loophole relating to remote supervision of sight testing and this needs to be closed/there needs to be specific wording forbidding it

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

specific wording preventing remote supervision of refraction. The power to add restrictions where these close loopholes in the future

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

No verification of age of prescription, no verification or accountability for incorrectly manufactured spectacles e.g. PD/OCs. see previous answers

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

regulation

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Allow prosecution to be done by or funded by the crown prosecution service

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Clinical investigation. Contact lens removal. Low Vision and Paediatric Dispensing. Refraction. Recording Vision and Acuity.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Low vision and Paediatric Dispensing.

Eye Examination.

Refraction (spectacle and contact lens). Delegated clinical screening for correct interpretation.

Emergency triage.

Contact lens insertion.

Contact Lens removal.

Effectivity calculation for vertex distance. Writing of prescriptions.

Prescribing eye health treatments.

Protective eyewear and sports eyewear dispensing.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Emergency Triage.
Clinical advice and interpretation.
DVLA Assessment

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Refraction for dispensing opticians. Would free up valuable time for Optometrists to see clinical concerns that present in emergency without pressuring services. The refraction can be performed in order to troubleshoot refractive errors in the event of absence of pathology in order to correct distant and near vision requirements. The refraction can be performed to dispense the most up to date prescription. Further training will allow Dispensing Opticians to recognise any potential for pathological circumstance and involve optometrist for further investigation (example: myopic shift due to cataract , VA no improvement best possible 6/12 , refer to Optom for dilated examination and discuss surgical intervention). Models in other nations have proven success and ABDO students from Malaysia must pass the refraction exams whilst British students are unable to do so.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Don't think optometrists are scrutinised enough. Internal audits present no real change in behaviours. Many records are lacking and critical areas of expertise left incomplete when required for troubleshooting. External audits on a consistent basis would tighten compliance.

Online internet based companies must be held to higher standards of regulation. Businesses (not optical) must be prohibited from selling spectacles and contact lenses without prescription (ready readers and Halloween lenses). It is to the detriment of public perception of the community optician where people can purchase products which deteriorate their vision in the long term and can be a risk to their sight and overall ocular health.

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

Hopefully this model would allow optics to work similar to how pharmacy works. Qualifications for support staff and more emphasis placed on the skills of the Dispensing Optician (who operates more like a community pharmacist and supervises every aspect of the team) and allow the optometrists to run their clinics knowing support is optimised with the expertise of a registered Dispensing Optician being involved in all decisions made when patients emerge with ocular health concerns.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

Dispensing Opticians undertake special qualifications (already offered by a British institution, ABDO) and show proof of a number of refractions competently performed without the requirement for re-test within a defined period.

I believe no restrictions are required as Dispensing Opticians already have expertise at recognising when clinical intervention would be necessary when sight deterioration may be quickly encountered (cataract, AMD etc) and can competently refer on to an optometrist if VA is poor and cannot be improved.

Another reason for no restrictions with overview from an optometrist is that the expertise in the actual appliance is greater understood by the Dispensing Optician. Many optometrists have an extremely poor understanding of the consequences of refractive changes in lieu of spectacle lenses which results in remakes when the Dispensing Optician would have greater understanding of the consequences. From experience I've seen optometrists recommend varifocals to AMD and end stage RP patients. Reduce the plus power in the distance of a patient due to cataract and ignore that they were a +6.00 at near and now left a +3.00 with no compensation for the loss in spec mag and that the extra mag helps them see clearer at near due to the bigger image as technically you could consider low vision at near if VA is 6/15 and N14 is the best they can achieve with their Rx. Food for thought.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The only disadvantage is Optometrists possibly feeling demeaned and undoubtedly look to stop it from happening with no real basis other than "it's part of our remit".

What must be remembered is the advantages dispensing opticians bring and can help absorb a high workload and actually work with the dispensing optician and learn how they would adapt their refraction to the actual appliance in terms of spectacle lenses, the dispensing optician learns the consequence of pathology and where intervention is necessary and everyone is able to upskill within the profession.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

If a dispensing optician suspects a Rx is wrong and can see by a VA check that a customer gets better near vision with new glasses but poorer vision in the distance (which is better with old glasses) it should be fair to say that the Dispensing Optician should be able to modify the Rx without fear they are breaking refraction regulations.

Example:

New Rx +3.00 R&L Add +1.50 (VA 6/10) N5

Old Rx +2.00 R&L Add +2.00 (VA 6/6) N8

A Dispensing Optician shouldn't have to send this to an optometrist. The VA check has found adequate distance vision with the old Rx and can see by modifying the add to a +2.50 we would achieve the same near Rx as the new which gives N5.

At present the only intervention for distance Rx is an effectivity calculation for vertex distance.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing Opticians are left stagnant and cannot progress skills. Already it's depressing that the high skills taught have a "you can look ... but you can't touch" attitude. Learn refraction, but you aren't allowed to ever do it. Use a retinoscope during your learning years but you'll never use one.

There is already an attitude from non registrants that they are more or less on the same level as a dispensing optician and companies jump on the bandwagon and value their dispensing opticians similarly.

The salary in comparison is disgraceful in light of the pressures a dispensing optician currently works under and the expertise and stability they bring to a business.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantage is in view of public health. If the public pursue contact lenses without professional advice this will ultimately lead to misuse and poor compliance which will result in increased ocular health cases and cost the NHS more money. This cannot be allowed to happen and online companies must be regulated if they sell within the UK. Not find loopholes because they register their head office in a foreign country.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Absence of patient management means the patient cannot be educated on compliance. Poor compliance leads to ocular health problems.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The registrant is more likely to access the patient record and look at the spec and relevant advice that may be overlooked by non registrants can be delivered (wearing schedule, solution recommended due to allergy for example)

It would be more appropriate remaining a verifiable specification as too many factors for consideration are involved.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Patients find it an inconvenience and looking to find ways to avoid this and still obtain their lenses.

A strict definition of what must be undertaken at the aftercare should be outlined as it's too often practices find a contact lens aftercare should be a "10 mins" in and out appointment. It's hard to see how a valued service every 12-24 months can be properly delivered in 10 mins and businesses should be allowing time for a clearly defined regime of checks during an aftercare.

The aftercare should be valued rather than looked at as a quick check that is an inconvenience barrier to obtaining the next batch of lenses.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Must avoid the general public having access to poorly manufactured and cheap cosmetic lenses that would risk ocular health and increased costs for the NHS to treat.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Only registered optical business should be regulated to sell such appliance and online companies must be made to register with the GOC to comply and trade within the country.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Some patients will find it a barrier to purchasing spectacles removed and won't bother having routine eye examinations or refractions.

The patient with the 12 year old prescription and can't tolerate any change to their refraction is always a challenge and something we must discourage rather than encourage.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Inappropriate fitting appliances not fit for purpose.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protections that the appliances are safe , of good quality , and fit appropriately.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Remote care helped through the pandemic as a majority of presenting eye concerns are not emergencies and can be solved with topical treatment or a treatment regime and can be investigated further if symptoms persist or worsen.

Helps take the burden off practitioners as too many people can simply walk into an optical practice and all want seen there and then.

We must be more managed and take the approach of a GP surgery.

Community pharmacy are awful at managing patients with eye concerns and must stop stating walk in clinics are available when they aren't.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Online selling of contact lenses is far too loose. Specifications do not need verified to purchase.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Businesses must register with the GOC mandatory.

If opticians and optometrists must register be under scrutiny as professionals , all businesses selling optical appliances should be no different.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment,

pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight tests / refraction
Dispensing glasses to all

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

You need to follow what the new Zealand board does

Audit record card/ notes

Referral letter

Quality of referrals ie letters back from HES and the outcome of the referral

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

New Zealand optical board

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

I think all patients should only be dispensed by a qualified person

But i know you won't do that so restrict to the following

Children

Visually impaired

Those with a learning disability

Those with facial abnormalities needing specialist frames

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Regulation, you can regulate ensure standards and protect the patient.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Need to make it clearer regarding low vision aids

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

There should be some consideration for current optometry under graduates who have made an investment into their education and may be qualified into a profession that is significantly changing over the next few years.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction

Testing of sight

Prescribing of spectacles and contact lenses

Dispensing of optical appliances to children, learning disabled, sight impaired and other vulnerable members of society

Interpretation of any clinical results

Referral to secondary care

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction

testing of sight

prescribing of spectacles and contact lenses

dispensing of spectacles to children and learning disabled and sight impaired people

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Low vision assessments

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Registrants should have to have some accreditation to interpret OCT and [redacted] results.
All registrants should be DBS checked and complete safeguarding training in order to perform their sight testing duties

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

During a refraction completed by an optometrist there is much more than a refraction being performed. Many crucial clinical signs can be picked up by a fully trained optometrist which may be missed/disregarded by a dispensing optician. Eg, pupil abnormalities, binocular vision issues.

Over the past 20 years public awareness of the health benefits of a sight test have been growing, if the GOC were to amend its statement to allow the public to have a refraction to just but specs without the health check, pathology would be missed and sight loss would increase.

GOC should be protecting the public by ensuring that a qualified optometrist performs a full sight test in order to manage and prescribe.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantages - None

Disadvantages Increased sight loss
Public health significantly less protected
Disrespect for the optometry profession as a whole

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage Continued protection of the public by ensuring full complete sight test performed

Disadvantage - optometrists in England unable to do follow up monitoring checks eg. fields and pressures

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages Protecting public eye health

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Learning disabled

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protection of a vulnerable group

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Any one could write in any specifications and therefore contact lens associated pathology would increase, sight loss would increase and people may be wearing inappropriate prescriptions for driving etc leading to potential death

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Visual acuity checks

Full anterior eye examination including the use of fluorescein staining

Check of the fitting of the contact lens

Observe the patient compliance to hygiene and care of contact lens use.

History and symptoms should be taken and appropriately managed

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There needs to be regulation so that non registered business and internet businesses are not allowed to sell plano 'fun' contact lenses.

Advantages of legislation remaining is protection of public eye health

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

n/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages poor eye health, missed pathology, people wearing wrong prescriptions and being unsafe to drive etc

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protection of the public by ensuring correct prescription and eye health have been checked

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Ill fitting, dangerous and wrong prescriptions would be worn by children. Could be disastrous

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Keeping children protected

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Keep people safe

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

There should be rules as to when it is not appropriate for an optometrist to view clinical results remotely and act on them.

As a general rule the optometrist should always be on site to interpret clinical results and manage appropriately

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

unsure

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Online sales need to be regulated.

It is not safe for people to be able to purchase online with out a registrant who has examined the patient verifying the prescription and specifications

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Verification by registrant must be compulsory

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

regarding the testing and dispensing of the learning disabled

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight test

Health checks of eyes

Providing glasses to children, and vulnerable adults without supervision

Dispensing/providing contact lenses

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Above

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Things within scope of professional.
Further training for eg IP

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

YAG, glaucoma/macula

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction is part of sight test, it gives invaluable information and insight into the patient. Hence it needs to be part of the health check. It can't be separated

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Financial- rechecks, responsibility with optom/DO?
If something is missed- who does responsibility fall on- disagreement between colleagues.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Refraction is important part of sight test, part of history and sxs and general information regarding px habits and behaviour get picked up during refraction, also px if feel uneasy can feel more relaxed by the competency of optom.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Have seen increase in patients who get lenses online, then when they have issues return to us as professionals to fix issues which can be sight threatening.

The easier it is for them to buy their lenses online, the more px's we see with complications

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Need more strict rules in regulating and holding the online suppliers to account for supplying lenses without the checks

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Some high prescription and patients requiring prism

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Too many of these patients come back to practices to fix the problem created as measurement are not correct

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

This is needed for patients safety

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Already there is not enough to control the online sale of cl's

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

It is needed

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This is needed for patients safety

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Seen by professional CLO/optom

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It is required to keep the public safe

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

It is already difficult to regulate these. Especially young people are getting coloured lenses online and they have higher risk of damage to eyesight due to non compliance and not getting the check ups

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Yes to protect the public

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would cause catastrophic effects to health of young individuals who don't have the hindsight of the impact of infections

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Lots of people are not aware of consequences to their eyes

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It is required to protect the public

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If prescription changes? Or there are health issues, patients won't be aware of this and cause longterm issues

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is required to protect the public

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

It is required as more likely for injury and longterm effect of injury

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Longterm damage to sight will have effect on mental, financial and physical ability of child

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is required their safety

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is required to protect the public

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Ophthalmology

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction.

Ophthalmology

Independent prescribing of therapeutics

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Practice ownership

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safe clinical service for the patient

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage in that patients could go for many years avoiding an examination-particularly drivers

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Supply of inaccurate appliances to minors

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Supplier subject to GOC regulation and answerable for errors

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Response ID ANON-NHAK-M14Y-D

Submitted to Call for evidence on the Opticians Act and consultation on associated GOC policies
Submitted on 2022-06-21 12:12:38

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

I strongly feel that refraction and the health of the eye are connected and during a refraction the patient can say things which can give clues as to the state of the health of the eye. If these are separated that can be missed entirely.

In the past 2 weeks I have seen 3 cases of Wet AMD which started by the patient describing things happening in their vision during the refraction.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

refraction
examining the health of the eyes
fitting contact lenses, especially new fits.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction
Examining the health of the eyes
Fitting contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

None

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

I believe that the current recognition of post registration skills is adequate

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

I am not very familiar with this so can't comment.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

again I am not too familiar with this

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

I think regulation by visitation/inspection is always a good idea

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

I am not familiar with this so difficult to comment.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

I feel it would be a grave error to separate refraction and health examination. The refraction is a major part of the eye examination and should be undertaken by the same optometrist. There are too many things that can be missed during the refraction. Also I think that patients would find it strange to see more than one person for the whole sight test.

I saw a patient yesterday who went for her [redacted] Visual field test and was most pit out that she was seen by 4 people for this !!

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

As I have said previously the refraction is too closely linked to the health of the eye.

When this subject was raised some years ago I was working in a practice owned by 2 Dispensing Opticians. One of them tried a refraction on a patient with very high astigmatism and got it all wrong.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I see no disadvantage to this. I currently work in an independent practice and there are no issues.

I think this change is being pushed by the multiples, especially the [redacted] one to somehow further their profits.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

Only personal view and the majority of views on the [redacted] website

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

i think the current legislation protects the patient, mainly in terms of eye health

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There are no disadvantages.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

I think the current legislation is adequate as it is

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

I think that contact lens sale is good as it is. Unregistered sellers are not a good idea, as patients would carry on having no health checks, or buy contact lenses with no idea how to handle them correctly.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Un registered sellers would sell contact lenses with no regard to patient health or safety

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

the system works well as it is.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients can be unhappy with the system as it is, but can be unaware that the system at present exists for their health and safety

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Aftercare should specify what should be done at an aftercare visit.

ie. Checking VA with C/Ls, making any necessary adjustments to the RX, checking the fit of the lenses, checking patient handling and care of the lenses, checking the health of the eye once the lenses have been removed.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I think these should be treated the same way as powered contact lenses.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Patients could buy these anywhere with no regard to fit and/or handling, or how to look after the lenses. This could lead to all sorts of issues.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

The reasons are still as the last answer.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There are no disadvantages, only to those people who want to buy lenses for Halloween and the share them with their friends.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

There needs to be regulation to stop unscrupulous sellers selling poor quality frames and lenses.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

There needs to be a time scleras on the validity of a prescription otherwise patients will be sold specs which are not fit for purpose. In terms of frame fit and vision

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients could buy any specs to any prescription and so easily this could be a waste of money as th vision could be impaired.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I don's see and disadvantages to this current legislation.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

This is a vulnerable group and frames and lenses should fit properly

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These could be bought and there would be little regard to the proper fit and correction of vision

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I think there are no disadvantages

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

i can see no disadvantages

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

As patient safety is the primary objective for the regulator then it should not be described as being part of a 'non heirarchical' list of objectives. It should be placed as the primary and overriding objective.

I believe that all of the questions below should only be judged under the criteria of 'is there a compelling public/patient safety' benefit? If evidence or insight shows there'll be a demonstrable negative impact on patient and public safety from proposals, or no provable benefit then this would surely take precedence in ruling out any changes?

I also believe that as the GOC progresses with its thinking, it should undertake a literature review and present the evidence and data against the proposals that would illustrate if there is a public/patient safety benefit, particularly on those areas where there is a likelihood of fragmentation of or risk to patient care.

I also consider that no legislative proposals can be put forward without a consideration of the wider funding and policy context in terms of delivery of primary eye care and specifically the General Ophthalmic Services contract.

Some introductory context would also be helpful for the consultation, which recognises that some of the limitations in delivery of eye care arise from effectively a low fee for GOS and how it acts as a 'loss leader' cross subsidised through the sale of optical appliances, which then in turn leads to both a public perception that optical care is driven by business/retail needs, and from GOC's own surveys of registrants, leaves some registrants also under pressure on patient throughput and targets, while the GOS voucher system for glasses can also incentivise over prescribing. For patients who may be "less easy" to test such as very young children, people with a learning disability or much older patients, there may also be less inclination to see these patients given they are more 'time intensive' and there is also some evidence that the funding system also acts as a disincentive establish practices in areas which are socio-economically deprived.

The underfunding of the NHS sight test has led some contractors to hand their contracts back to the NHS, but in England it has also led to development of 'additional' pathways to supplement the NHS fee through local negotiations with commissioners for more comprehensive clinical care.

Some of this is arguably what should be part of the standard sight test but cannot be delivered within the constraints of the fee. This includes the community learning disability pathway in England where CCG's effectively 'top up' the fee with a locally negotiated supplement. NHS Scotland now has a GOS funding system where different levels of clinical input are funded appropriately, a higher fee can be claimed for additional or repeat tests/ patients with complex needs and a similar system is being planned for Wales.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

See Q 8

7 What activities do you think must be restricted to our registrants?

Please provide details.:

See Q8

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

I would like to see greater restrictions on the sale and fitting of glasses to people with learning disabilities so these can only be provided by registrants, in the same way as for children under 16 and those registered visually impaired. The GOC should also be actively considering which groups need to be given the added protection of restricted activities.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not Answered

Please give your reasons and provide any evidence to support these.:

I am supportive of the GOC holding more details of the training, skills and qualifications of registrants. A more 'searchable' patient focussed register that could identify if registrants had undertaken post registration training to see patients with additional needs. Currently these qualifications are Professional Certificates in paediatrics, glaucoma and medical retina, Independent Prescriber Qualifications and academic masters modules in specialist areas such as the WOPEC learning disability modules.

This would also be helpful in the absence of community funded services in all special schools or learning disability eye care pathways across the country, enabling a place for us to signpost enquiries to and for patients/carers to identify practitioners. It will need to be user friendly though in terms of enabling patients/carers to understand which registrant is linked to which business.

As the regulator the GOC needs to ensure public safety through adequate qualification of the professions it regulates. How it achieves this is a matter for open negotiation with the other stakeholders such as university providers and professional bodies.

The following paper detailed the minimum reevaluation levels for all health professionals in the UK.

It shows that under the now replaced peer regulated CET system optometrists were not required to validate skills and hence ongoing validation and training is likely to be needed. The current laxer system add no additional requirements.

Continuing professional development requirements for UK health professionals: a scoping review M. Karas, N. J. L. Sheen, R. V. North, B. Ryan and A. Bullock BMJ Open 2020 Vol. 10 Issue 3 Pages e032781 Accession Number: 32161156 PMID: PMC7066625 DOI: 10.1136/bmjopen-2019-032781 <https://www.ncbi.nlm.nih.gov/pubmed/32161156>

Another paper by the same team currently accepted by OPO and in process shows that core competency skills for glaucoma work are not universally present in the English work force.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

I support more consistency and oversight of optical businesses and regulation. The split between what the GOC is able to monitor in terms of a business practice – if registered - and the role of the Optical Consumer Complaints Council is confusing for patients and the public, and there is simply just very low awareness of the OCCC and its remit/what constitutes complaints.

For some businesses such as domiciliary eye care there is an even greater case for oversight as this patient group are arguably more vulnerable and this would also be an opportunity to introduce a more explicit set of standards for domiciliary care rather than a sector led code of conduct. The reputation of domiciliary providers is not good and the regulator should be looking actively into services provided to this vulnerable group.

Primary optical care is able to deliver more advanced clinical care than the GOS contract allows for, and this is needed particularly to ease pressure on secondary care services. As NHS contracts expand and clinical advances are made, patients will not necessarily even understand not all optical practices are inspected or regulated against standards that exist in other areas of healthcare.

At the same time – as noted in the introduction - there is also increasing commercial pressure on registrants, which can have an impact on patient care.

How regulatory standards and inspections will deal with these pressures given the hybrid nature of optical care will need thorough consideration.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

I would like to understand more from GOC on how it currently utilises the business standards and what casework exists on breaches of standards. I am not aware of any annual reporting on activity around business registrants. An issue for the GOC would also be whether it would need more fundamental reform eg a review of council membership to ensure it could regulate completely impartially, while providing a fair regulatory model and having the mechanisms to rightfully engage the sector.

A further issue is what will businesses be inspected on, how frequently and where will reports be held? It is important that inspections focus on how accessible practices are for people with disabilities, for example, and willingness to make reasonable adjustments.

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

There are many types of regulatory systems in place across health and social care in England and these should be critically appraised for relevance to the practice of optometry and dispensing optics.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

The proposal on delegation of refraction comes with little evidence or data to support the public benefit case for it. Without seeing the evidence for a clear patient benefit (which is how the proposal should be judged), I do not support delegation or de regulation of this function. There does not seem to be any evidence of a shortage of eye examination appointments nationally and/or long waiting times. The proposal may suit commercial considerations, but in respect of eye health it could lead to further fragmentation and confusion as to the different elements of the sight test being performed by different people.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

See answer above. In addition I would stress that it is for the regulator to ask for evidence for the case to change in the context of the impacts mentioned above from those suggesting this change. If there is not a overriding benefit for the patient then the status quo needs to be maintained.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Please see my answer to Q18 below in terms of the public health and patient safety case for retaining the sight test as it is in terms of clinical requirements. We have strong objections to the proposal.

There has been a positive move in England to support clinicians who are testing patients with complex needs allowing for flexibility not to have to complete every element of the sight test, if the patient cannot comply or tolerate with all the requirements. NHS England has made this clear in a letter to all contractors, and there was no need for regulatory change to help address the need for flexibility.

In my view a primary limitation on sight testing is not so much the regulatory constraints but how willing the NHS (at least in England) is to fund the services that provide that sight test and where they take place.

The funding variability affects patient experience, and the consultation in my view should be helping make a case for 'building up' the GOS system so it is better funded rather than breaking down further into different elements.

It is well recognised that the £22.14 standard 'GOS' fee paid to practices and for domiciliary visits to day centres is well below that of the 'actual' cost of providing the requirements of a sight test, for those with complex needs such as severe learning disability, that underfunding is compounded by the likelihood that the test will need to take much longer due to adjustments that patient will need, including potentially splitting up the test into different appointments.

To its credit Scotland has gone so far as to introduce a complex needs payment and framework for sight testing, that allows for flexibility of approach but also recognises the additional length of time and so funding needed to see patients with additional needs.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I strongly object to any suggestion that the eye health element of the sight test could be split out from the refraction element. Where is the evidence that this will benefit patients?

Inevitably given serious eye health issues are often 'silent' and only become obvious later in development that the patient self reports, the proposal would undermine active case finding, as for the most part it would lead most patients towards choosing refraction (likely to be cheaper than a full sight test, if the patient has to pay). Eye health needs could then go neglected and lead to much later presentation and unnecessary sight loss.

For patients with complex needs, eye health issues are far more prevalent than in the general population, not only will people need glasses but there are many heterogenous eye conditions that people will have. Some of these will be linked to genetic conditions or syndromes, some will be linked to a higher risk of comorbidities that also cause sight problems (eg. diabetes), some will relate to severity of learning disability which is strongly associated with an increased likelihood of sight problems. These are patients that are unlikely to self report any problems with their eyesight - refractive or otherwise.

This is why promoted and targeted services are so important that can provide as much of a one stop shop of eye care (either in special schools or community LOCSU pathway areas).

There may be misunderstanding by patients /parents/carers that a refraction is a full sight test, despite what is communicated to the patient. This is known to be the case in diabetic eye screening, even in vision screening in children, I often hear from patients and parents/carers that they have had a 'sight test'. For many people there is a perception that screening is an equivalent.

In a time when sight loss is rising, much more education and promotion of the importance of looking after your eyes and eye health is needed and the sight test provides that comprehensive check that people need.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

See below

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

For both Q19 and Q20.

Given the risks to patients it would be helpful if GOC commissioned its own literature review on this issue and considered what evidence has already emerged around eg. late presentation of glaucoma cases due to the introduction and availability of 'ready readers' in retail settings.

Data on referrals into secondary care for eye health issues should be available through an analysis of GOS data. However that is not a comprehensive report because there will be eye health issues that primary eye care can also treat and support without the need for referral. So for example, within new NHS data from special schools, 2.8% of children seen have needed a referral into secondary care, in the main because for most children it is refractive correction or support for cerebral vision impairment that can be practically managed through the schools service.

Some eye health data from work with adults with learning disabilities is given below:

In one pilot promoting sight tests with adults with learning disabilities, 30% of all patients were referred on to their GP or Hospital Eye Service for an eye health or other health issue and 33% of all patients had a new eye health issue identified. Overall in that patient group 52% of people had an eye health issue.

In 2019 data from a pathway being implemented in the London Borough of Sutton found of 391 patients seen, 154 eye conditions were present (either already identified or newly diagnosed). This shows the heterogeneity and prevalence of sight conditions – 12% of the caseload had cataracts, for example.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

I would like to see greater restrictions on the sale and fitting of glasses to people with learning disabilities and for people in a domiciliary setting so these can only be provided by registrants, in the same way as for children under 16 and those registered visually impaired. This was an agreed position statement by the Vision UK learning disability committee in 2018 and was based on both data and evidence that the vast majority of people with learning disabilities will need glasses – 6 in 10 adults and in our work in special schools over 4 in 10 of children.

The committee took on board anecdotal reports from people with learning disabilities and professional bodies of poorly fitting glasses or adherence to glasses wear. The expertise of an optometrist and in particular a dispensing optician is needed to help establish if there are adaptations or styles of glasses that can support individuals, and provide any follow up advice or support.

While I recognise that there may be some commentary that this restricts patient choice, this is not an issue that people with learning disabilities or parent/carers have raised with SeeAbility, conversely many report that they would appreciate more professional support and advice.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantage to the patient would be that a registered professional fits the appliance and this would hopefully act as some barrier to overselling, not a great one but at least some as professional integrity is assumed. It would be interest to compare the GOC own data in its recent work force survey that found 29% of registrants felt pressure to meet commercial targets at the expense of patient care with a similar survey of sales staff.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Again referring to the GOC own work showing a significant commercial pressure this is likely to get worse once professional responsibility is removed.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See answer to 26

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

A literature review should define evidence based guidelines which can then be agreed by the professional bodies. This would be a clinically lead set of guidelines defined by clinicals and researchers which would not be possible with deregulation.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Not my area but a zero powered contact lense is still a contact lens so I would be lead by clinical experts in this field that suggest professional fitting.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

No professional fitting and care.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The definition of sportswear would be flexible. If its an optical appliance its an optical appliance and so should be regulated unless there is evidence to suggest patient benefit.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

People with learning disability and domiciliary setting should be fitted by a registrant.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I work with low vision patients and people with learning disabilities and I have seen the use of telemedicine during the lock down be almost totally inaccessible to these groups with very little options offered. .

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

In the the GOC does not enforce the rules even as they stand.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Other - please specify

If 'other', please specify.:

A non-UK based business entity specialised in teleophthalmology

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I am a consultant ophthalmologist working on implementing and improving digital ("virtual") clinics in [redacted] Eye Hospital, [redacted] UK. I have more than two years of experience in serving NHS patients remotely. Likewise, I have been part of a few audits on patients' satisfaction and other virtual clinics related issues. Then, I established a non-UK but EU-based business company specializing in teleophthalmology. I have experience in the above topic and may share my opinion regarding the questions on providing remote care via non-UK-based companies. I believe there are pros and cons which should be considered.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I based my answer on my personal experience, internal [redacted] audits, and published manuscripts.

Some of the examples of published articles:

Hanumunthadu D, Adan K, Tinkler K, Balaskas K, Hamilton R, Nicholson L. Outcomes following implementation of a high-volume medical retina virtual clinic utilizing a diagnostic hub during COVID-19. Eye. 2022 Mar;36(3):627-33.

Kortuem K, Fasler K, Charnley A, Khambati H, Fasolo S, Katz M, Balaskas K, Rajendram R, Hamilton R, Keane PA, Sim DA. Implementation of medical retina virtual clinics in a tertiary eye care referral centre. British Journal of Ophthalmology. 2018 Oct 1;102(10):1391-5.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I am not aware of any regulatory barriers.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

I consider that both opticians and providers of remote care must satisfy GOC and GMC's good clinical practice criteria. Basically, everything that is mandatory to provide face-to-face service should be followed in remote work. That would be the best way to provide the best safety for patients.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

In addition to mentioned above, I consider that remote support provider should held a valid insurance and that all information should be kept protected using only software registered and approved in the UK.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

NA

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Testing of sight/eye examinations/prescription of optical appliances/provision of contact lenses

Dispensing to restricted groups which should be expanded to include vulnerable adults in their own/care homes

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye examinations

Dispensing to restricted groups including vulnerable adults in care/domiciliary settings

Supply of contact lenses

decision to substitute contact lens material or design-we are seeing research by Efron/Morgan et al regarding the potential risks posed by unregulated substitution.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Substitution of contact lens material. Current situation makes a mockery of the Act

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

As our roles evolves this will be a moving feast. legislation needs to give GOC the elbow room to evolve legislation in response to changign societal and technological forces

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

Business reguation needs to be completely updated. the regualtion of title is anchronistic GOC needs jurisdiction over all regualted ACTIVITY not tiles.

As a former registratnt director of a business the requirement for a maojority of registrant directors, though well intentioned, is not fit for purpose-a registratnt could be defined a director without being party to key strategic decison in a business.

I wonder if a system like pharamcy where ana ccountable registrant is identified witht he power to intervene if they are unhappy with business processes. We should at least consult with GPhC for +ve/-ve in their system

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Too many practices can obfuscate their resposibilities by not beign registred body corporates. My expereicne with the OCCS is very frustrating in this regard as soem businesses use protected titles but don't abide by GOC standards and systems. This misleads the public and erodes confidence in the profession IMHO .

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

worht discussion with GPhC about how this works for them

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

and ensure ALL business carrying out ANY restricted function must be regulated/under jurisdiction of the regulator. this is key to public confidence in the profession

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes - under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

Technology will enable increased delegation of refraction and elements of the eye examination but the point accountability for a prescription should rest with an optometrist

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

could be the thin edge of a wedge to split refraction from eye health which i feel risks eye health for consumers.

We have no evidence that patients are unable to access eye examinations or that costs of the examination are prohibitive. Again [redacted] has very little case work relation to cost of an eye exam. these two factors would be the catalyst for change but they are not yet there.

We may need flexibility in this area as demographic pull of increased eye health issues /increased prevalence of myopia globally combined with an emerging ophthalmology manpower pinchpoint will pull optoms into increasingly health related activity whereby the need for DOs to refract and fill that void may emerge but we are not there yet.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Old 1989 Act is just so badly worded now it needs a re think and re write

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We dont have a public health access to eyecare issue (as dentistry often reports) so not sure anything too detrimental in status quo. Not sure any scope for much cost benefit for consumers as cant see costs coming down significantly

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Current situation where a consumer can go to the internet with no prescription order lenses randomly a potentially wear them to drive makes a mockery of the Act. BMG Research 2016 is clear on the potential for this kind of behaviour and Generation Y and Z may be increasingly minded to follow such a libertarian approach.

Regs were drafted when most CI material were to same and the differences were the parameters of the lenses/size/base curve etc. Now the only real variable is the material itself and the decision to 'replicate' is completely different.

a 6 foot steel pole being replaced by a 6 foot aluminium pole is not a meaningful substitution. the dimensions may be the same but the performance will be different.

Substitution IMHO should only be safely enacted when either

a) the manufacturer of the originally prescribed material issues evidence based guidance that it is safe to move from a prescribed product A to a proven substitute B. This would facilitate product development and uptake by the public.

b) A registered ECP who takes accountability for the eye health of the patient having examined their eyes initiates substitution from A to B

The current reality of online substitution makes the Act meaningless.

See latest research from Efron/Morgan et al for the emerging consensus globally on the risks of substitution

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Changes as I have outlined may remove some low cost obsolete lens materials from the sector but I believe that is small price for better eye health of new modern materials

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Children

Adults in Domiciliary settings who may have restricted choice should also be better protected

I also think the limit for the sale of ready readers should be limited to +250/+2.75. Anything above this is probably correctign latent hypermetropia in addition to presbyopia.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Domiciliary

added clear protection to redress when concerns arise. I believe this will reduce risk of exploitation and over selling to vulnerable groups. [redacted] can share case studies as evidence in this regard.

people wearing ready readers of £D and above will have to get their specs prescribed. Increase cost but the right thing for their eyes IMHO

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

See previous answers

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not Answered

Please give your reasons and provide any evidence to support these.:

Change could improve protection

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

probably anachronistic now

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

law comes into alignment with current reality I suspect

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

with the development of better lens materials there is a risk of wearers being false about health risks of putting plastic onto to most sensitive and one of most physiologically complex structures in the body.

A period of aftercare-probably maximum bi yearly to check the eye health would be wise

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Yes if it is relaxed any

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Online & also some unwittingly wrong supply of cosmetic lenses is not insignificant

Physiological risk at lens /cornea interface is no less whether the lens has a refractive power or not

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It does provide level for public protection we just need better enforcement of transgressions

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Bespoke products

risk of harm if incorrect

as Myopia management evolves we need registrant control of the process

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Reasonable brak point that also stops people evadign routine eye health checks

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Risk that patients disconnect from routine eye health checks with subsequent risk of eye disease

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Encourages regualr eye ehealth cheacks to reduce risk of eye disease

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

restriction of ready mades to +250 or +2.75 power
anything above this is likely correcting some degree of latent hypermetropia

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Small group fo ready made wearers would need to have specs prescribed increase cost but better for their eyes

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Development or AI for OCT could enable new ways of analysing images

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

potential to be more accessible

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

simply the fact that the legislation is historical and doesn't accommodate new tech of this type

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

hamstrung by Act written before such technology existed. We need complete rethink

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Need flexible legislation to move with the evolution of technology

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

with modern tech there is no reason that online supply couldn't be subject to ensuring key dispensing measurements are taken and recorded by the provider to ensure fit for purpose-esp modern PAL design that is so contingent on accurate dispensing

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Tricky as not sure how UK regulator regulates supply from non-UK territory-need international trade legal expertise here

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are



3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight testing

Fitting prescription contact lenses

Supplying low vision aids to under 16s

Dispensing complex prescriptions to under 16s

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Same as above

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should not be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Interpreting OCT and referral refinement to reduce unnecessary referrals into secondary care. These add to an already overstretched service and can cause unnecessary anxiety to patients.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Who takes responsibility for non tol?

What happens in cases of poor vision due to refraction when there is other pathology, eg cataract?

If same individual is refracting and doing health check can be more confident of the full picture

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

When patients genuinely need a new refraction but are restricted due to GOS rules/confusion

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Same individual takes full responsibility of patient.
Is more time consuming but better to be thorough.
Can identify issues of non tol easily.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Doesn't devalue possible sight threatening complications with contact lenses
Can charge accordingly as they are seen as a medical device rather than cosmetic

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Under 16s
Registered visually impaired
Vulnerable patients, eg those lacking capacity

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Ensures these patients receive proper care

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Make supply easier as sometimes difficult to verify

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Power or not, they can cause sight threatening complications

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safer for patients

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Who would do their ocular health checks?

Who would be responsible if their vision had deteriorated after 2 years and they made a purchase they were happy with?

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Ensures timely ocular health checks.

Ensures vision is optimum for patients.

Gives opportunity to talk to those who have fallen below visual driving standard without them realising.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Will it provide adequate safety?

May be more costly to patient

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

refraction, cl fitting, internal and external examination, dispensing,

7 What activities do you think must be restricted to our registrants?

Please provide details.:

interpreting results from any 'pre-screen', issuing prescriptions, deciding on referrals, cl fitting and aftercare, internal and external eye exam, assessment on muscle balance, specs dispensing

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

see q7

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

making sure skills not used daily are skill up to date, eg, contact tomonetry

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

There are many times when a refraction is modified for the px needs.

For example, px with amblyopia some prefer a balance lens, some full rx and some modified.

What would happen if reduced VA was found?

Sometimes large refraction change is due to pathology - macula odema, which h=can therefore be missed in fundus exam not done

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

None to the patient willput eye healthy at risk. Due to reduced eye testing durng Covis pandemic i have seen

1. px with advanced cataracts not noticing their vision has reduced to below driving standards

2. Wet Amd left untreated

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

There should be a GOS MECS type option for examination

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Without proper advice and guidance,, there is more risk.. overwearing, not cleaning, wearing when swimming, and tight fitting - all which can lead to irreversible damage

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

No

Please give your reasons and provide any evidence to support these.:

zero powered lenses should have the same rules of supply as other contact lenses

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

There should be limits on the prescription, as many people guess there PD and can have problems with prismatic effects. For the same reasons bifocal and varifocal lenses that need very accurate measurements should not be allowed.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

relating to above issues

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

We need more control on standards for existing refraction standards. While there may be very competent dispensing opticians, it is problematic to remove the refraction element from the sight test. There is a risk that patients will attend for the sole purpose of refraction for new specs and miss out on the health care benefits of full examination.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Examination, refraction, prescribing spectacles, clinically necessary tests.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction, examination, clinically necessary tests.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Clinically necessary or indicated tests.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

Too many loopholes for the supply of contact lenses. I have encountered patients with problems arising from unregulated and inappropriate supply of lenses.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

Better control for patient safety.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

It currently has NO power to police the existing regulations.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

There are some very competent dos who could do better than optoms.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Better patient care.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

Too many unnecessary come from inexperienced, insecure, unsure optometrists from [redacted] .

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would be better if the existing regulations were applied effectively.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

All categories of patients should have an adequate level of professional oversight.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better patient care.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is not well policed at present. Further watering down will reduce payiecar3.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Are the lenses causing adverse results on the cornea.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Danger from poor cl hygiene

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Poor control at present. Relaxing standards worse.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Poor patient care, missed pathology, blindness

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None as long as it is appropriate

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Not policed.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight tests contact lens fittings

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sight test - whole

Cls checks/fit

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Not sure / no opinion

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Refraction is one of the most important aspects of being an optom and tells us SO much about the eye health.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Currently : no disadvantages from the optom pov. From the employers pov, more time with px so less money
Advantages: keep optoms doing the whole ST so they get full overview of eye health

If things were to change:

Disadvantages: further degradation of the profession

Advantage: multiples will push for more and more and will get more and more money. At what cost?

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It should stay the same

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

None registrants should be restricted from testing of sight, supply/ fitting of contact lenses, and dispensing of spectacles to children, vulnerable adults and hospital prescriptions

7 What activities do you think must be restricted to our registrants?

Please provide details.:

unless further certification is obtained, glaucoma referral refinement & monitoring, extended prescribing of some drugs, MECS schemes, AMD monitoring.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Supply of spectacles to adults with learning difficulties

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

MECS, Glaucoma and AMD Specialisations

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Separating the sight testing from health examination could result in missed pathology

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Dangers associated with missed pathology. There is often a connection between the testing of sight and detection of pathology

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

advantages are continuing high standard of care for the patient

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Anecdotally 5% and rising with an increasingly ageing population

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Plenty of anecdotal evidence for refraction results pointing to pathology concerns, which are then further confirmed by eye health checks

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Current arrangements are as safe as they can be, although it is possible for patients to purchase lenses from a foreign supplier over the internet without a certified prescription that is up to date

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Adults with learning difficulties

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages would be that the supply to this group, who are often more challenging, would be safer and more matched to the patient's needs, given the extra training and experience that a professional has. Very much the same as would be the case for children's supply

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Less supervision by a professional could mean an increase in pathological events

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

disadvantages would be a risk of inappropriate lenses being supplied, risking patient safety

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

there should be the same legislation for plano lenses as the risks are the same as for powered lenses

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

If the regulations are relaxed, there is a raised potential for patient harm caused by insufficient checking

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

safety for the patient would be maintained

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It is reasonable, and indeed a recommendation that adults have 2 yearly examination to both verify the prescription and check the health of the eyes

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Incorrect prescriptions being issued and pathology being missed

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safety of the patient being maintained

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Children require a professional input into the supply of any optical appliance as their vision is still developing, and they often have more specialised needs

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

inappropriate appliances being supplied, resulting in potential damage to the child, possibly permanently

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

maintaining safety for the child both in the short and long term

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

continuing safety and care of the patient

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

electronic referral of patients to other professionals is more effective, especially if accompanied by imaging (photos/OCT images).

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Dispensing without supervision of a dispensing optician. Reduced errors in practice.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Holding prescriptions in the opticians

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should not be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

N/a

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Refresher courses

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

Dispensing opticians in other parts of the world including parts of the EU allow dispensing opticians to refract. This takes responsibility of the optometrist who can focus solely on pathology and minor eye conditions instead.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantages

- equality

- As the dispensing opticians do the dispensing, its easier for them to deal with problems straight way and have to wait for an optometrist

- if dispensing opticians can refract, then optometrist can focus on minor eye conditions.

Disadvantages

- further training dispensing opticians will be required

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As above

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Na

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Patients with prisms at any age

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages

- less dispensing errors

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

No

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Na

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

If a auto refractor check can be done before dispensing that would help the judgement to use older than 2 year prescriptions

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Technology allow for mroe accurate diagnosis

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Na

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Na

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment,

pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight testing/refraction

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The complete eye test as it currently stands today.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

To enable a complete/thorough refraction, the full picture/understanding of the px's ocular health is required, in my opinion. The effect of pathology such as cataract or keratoconus would have on a refraction and expected va's and I feel only an optometrist would only be equipped and able to take all these factors into consideration and give the best care/outcome for the patient. The refraction should NOT be delegated.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Numerous rechecks, overplus, over minus, amblyopic eye given to much Rx leading to binocular issues, diplopia, dangerous drivers, accidents, extreme detriment to px's health. Mismanaging of prisms.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Keeping it as it is would be the safest option for the patient.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

Possibly to people with certain disabilities, dementia, reduced mobility.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Wrong contact lenses could and would be dispensed without complete verification of a contact lens specification.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Silly question!!

A lot can change in 2 years. Undetected pathology, refraction, va's, eligibility for driving.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Read the above

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

They should not be allowed to supply optical devices or use any professional term that the public could confuse as a qualified person or organisation

7 What activities do you think must be restricted to our registrants?

Please provide details.:

They must work within their scope of practice, but we should keep trying to expand our services, from therapeutics, Glaucoma treatment, including SLT, corrective laser treatment, YAG laser capsulotomy, wet and dry AMD management etc

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The selling of Optical appliances by non registered online companies

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

See answer above to Question 7

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

It's makes the professional "unprofessional " and clinically demoralised that someone can purchase glasses elsewhere from the practice and business they are tested at.It seems, particularly for an Independent practice, that we are having our livelihoods taken away from us to serve the needs of large commercial Optical companies, either online or on the High Street, where the bottom line is making money and pleasing shareholders.How can we take on extra eye health roles if our revenue goes elsewhere. I don't take my dog to the vet for a checkup and then go elsewhere for treatment .

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

See above answer for Q 11

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

Practices are already successfully inspected by local Health Boards

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

It is essential that who does the refraction has a fundamental understanding at degree level of all factors that can influence visual performance, otherwise pathology will be missed.

Without a knowledge of pathology , refraction is a risk to the public.There are many pathological factors that can affect refractive outcome, not just optical changes.i.e diabetic macula oedema, intra ocular tumour, retinal tear/ detachment, optic neuropathy, corneal dystrophy, to name but a few.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

See answer to Q 15,

ALSO

The only people who gains from DO's refracting are the large chains who will employ cheaper sight testers to improve their margins. Not every small community independent practice will be able to buy all the most up to date equipment ([redacted] . automated refraction, OCT etc) as proposed by [redacted] as a means to allow someone else to refract. Will there be grants available to allow us to update equipment?

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

See answers to Q15 and 16

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See answers to Q15 16 and 17

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I am an IP Optometrist, so I refer less patients than I used to.
Most are for cataract surgery, which are about 1 a week (I work 2 days a week)

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

No; but having worked as an Optometrist for 31 years, 11 as an IP Optometrist, I am aware of the potentially serious pitfalls for separation. Also, who is ultimately responsible if pathology is missed?

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

You wouldn't have a pacemaker fitted by someone not qualified, so why would you allow anyone to fit a medical device on your eye?

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

What would be the point in spending huge resources being trained to fit and CL's , and ongoing A/C, if any non qualified person could do it.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Learning disabilities, Alzheimers, Dementia, severely sight impaired.

How would another supplier know the patient's medical background and discussion on limitations on what the patient can see with the appliance, as well as positioning and lighting levels.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages for reasons stated

Advantages to qualified person is that effectively they are being paid (by staying with the original sight tester and organisation) for the extra time involved discussing with the patient and their carer the limitations and optimum requirements to use the appliance.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

See previous answers

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

It is a medical device, therefore the patient should remain under the care of the CL fitter for their protection should future infection or change in eye health occur.

Refer also to answer and reasons given earlier regarding the sale and supply of glasses should be by the prescriber .

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Non registrants should not be allowed to sell and supply glasses.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As stated above, non registrants should fundamentally not be allowed to sell and supply glasses.

If we want Optometry to evolve, unless there is another way of funding ourselves , we are giving away effectively part of our livelihood to anybody.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See my overall comments for the previous 2 questions

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As stated in previous answers, we are throwing our livelihood away if this is not restricted to the prescribing practice

Why waste 4 years gaining a degree; then another year as a pre-reg, sit further exams, go on to do post grad qualifications, when the main source of my income can be taken by anybody not qualified, setting up in business to sell and supply optical appliances for any age group.

Children's vision develops at different rates .The prescriber is in a unique position to monitor this; as well as growth, rx change; myopia management,adjustments to appliance size, CL fitting and aftercar

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See previous answers

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Telephone consultations including patients sending images of a red eye to secure NHS email address for remote assessment

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

We were an emergency eyecare centre during the pandemic. We used telephone and online consultations successfully.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Online sales should only be done as an additional part of appliance selling from the prescribing practice, not by an unqualified third party, for reasons stated in previous answers- mainly lost of livelihood and making a mockery of spending years gaining qualifications.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

See above

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

See above answers concerning patients taking prescriptions elsewhere , including online portals by non qualified .

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

See previous answers

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Any activity that could be interpreted as the testing of sight with the intent of supplying an optical appliance.
Dispensing activities should be supervised by a registrant according to experience and knowledge gained.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Dispensing to children and vulnerable adults and those sight impaired and severely sight impaired (whether registered or not).

Any activity that requires additional qualification ie contact lens work.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

Existing qualifications provide sufficient protection for the public. Too many demarcations can leave the public bewildered.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Even after 64 years of the Opticians Act, with amendments, it is my view that the public is largely unaware of the differences between a Dispensing Optician and an Optometrist. If dispensing opticians were allowed to refract it would create a two-tier system that would be even less understood. Members of the public are not in a position to know whether just a refraction, or a complete sight test is needed for their circumstances. They would probably be swayed by the costs involved. Financial and clinical aspects could become more clouded to the detriment of the public whose safety and protection are paramount.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Answered in 15

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Legislation provides the protection required. I do not see any undue disadvantages or barriers currently.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Current legislation on sight testing provides ample public protection. If a system works with reasonable efficiency why change it?

Registrants aspirations to work in diverse fields (often with enhanced so-called qualifications) can lead to confusion about a professional's abilities and limitations.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

A CL practitioner requires additional knowledge and the health of the eye is more directly implicated in this work.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As before, the current legislation appears fit for purpose.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

Vulnerable groups already protected.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Provides adequate safeguards and protection for public and practitioner.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Depends how they were changed. No point in relaxing a working system.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

A necessary check/balance.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The possibility of incorrect specifications being given to the patient and the inaccurate subsequent supply of an appliance or of advice on eye health.

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Public not in a position to be able to make proper technical decisions on optical appliances.
Buying ready-made readers to use while driving is an example.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

The time limit directs public towards an eye health check.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

They may purchase incorrect lenses, putting others at risk by wearing a defective and out-of-date prescription. No public protection as the implication is that no new eye examination is necessary.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Plainly it is in the public interest to be wearing the correct prescription.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

If it is felt desirable to offer sportswear optical appliances then the appliance should be accurately fitted by a registrant.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Open to financial inducement, special offers, other advertising ploys without adequate technical support.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Provides sufficient protection and therefore fit for purpose.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

From the public standpoint, differentiating between an un-registered optical assistant/consultant, a trainee dispensing optician and a registrant could be made clearer.

Also, the explanation of the extent and degree of supervision of a trainee dispensing optician and the ability to intervene could be strengthened.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Supply of spectacle to complex Rx

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

No, the refraction is more than just a set of numbers, it is indicative of health changes and is entwined with an assessment of eye health. 80% of px's do not want an eye health check, they want a prescription for new glasses. As an optometrist I think that it is my duty to refract and assess eye health as part of an eye examination and the px believes they have the best possible care. What happens if they have a simple refraction with a DO and the result is indicative of a problem, yet they have no follow up. If their vision is below par, should it be investigated there and then? Where is the optometrist in this scenario? Will the px return if they are required to be seen another day for the full ST? I strongly feel that by delegating the refraction there is a Pandora's box that cannot be closed again.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantages:

A business can save money by using "cheaper" professionals to complete 30% of the eye exam (very short term).

Disadvantages:

From a business point of view DO's would command a pay rise to be more profitable than it's their skills, would it make sense to pay two people (optom and DO) for one eye exam?

There is a conflict of message to the px, arguments over splitting the eye exam between 2 professionals.

Refraction is a part of a process, not a separate, stage. (How many times have we done a recheck to realise that it wasn't the prescription that was at fault, there was more to it... and as an optometrist I can explore that fully.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

Complex rx.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not Answered

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Surely you can't dissociate the supply of optical appliances to under 16's from the supply of sport optical appliances to under 16's???

If it is eyewear that contains a prescription then it should be regulated. Children cannot always tell you that the vision is not clear/ correct and more damage can be caused by the wrong Rx in that age group... equally as valid in sports eyewear

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not Answered

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

If it is sold in the UK then it must be regulate under the UK opticians act. Companies registered abroad that do not abide by the same rules should be prevented from supplying the Uk.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are they any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Selling all types of spectacles and contact lenses to all age groups

7 What activities do you think must be restricted to our registrants?

Please provide details.:

None

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

Contact lens Opticians already refract and look at ocular health when fitting contact lenses so why make up courses as they already carry out and have been trained in contact lens procedures. Its inly a money making gimmick.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

As in some business still unregistered staff carrying out registered personnel jobs

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

There is no need to have an Optometrist oversight the refraction as this would still be waisting time and especially contact lens Opticians who do this anyway, Why teach them to suck eggs!!

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It would stop Optometrists especially locums from over charging Practices and quite a few people only require a refraction not a full eye exam, so let the public choose what they require and what they want to pay for. Stop over inflated Optoms wages.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Its well out if date due to new modern equipment that can do most of the refraction without a human bring and be more accurate

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Holding back the profession, staying in the dark ages.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

My Optometrist refers nearly 50 percent of my Patients due to lack of confidence in her abilities and worried about if she misses something she will be held accountable and face GOC proceedings. Therefore covering herself but causing Patients worry for mainly no reason and causing extensive waiting times in the hospital eye service. I see the results when the hospital write back with the results and 9 out of 10 times Patient fine.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Most of the Public only require new specs and therefore only require an up dated prescription.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Its too lacks as allows anyone to prescribe contacts

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Free for all anyone is allowed

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes - please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Every one should only be fitted by Qualified personal.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There would be no financial problem as let the correct qualified Optical Practice receive the remuneration not on line unqualified receive the money for doing nothing. Perhaps also there would be less RTC s on the roads as public would be wearing correctly fitted spectacles and contact lenses

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Too free

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

It would improve their protection make them have contact lens checks more regularly and use the correct cls and solutions

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Keep Patients going to a Qualified Optician not buying in line

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Qualified persons only

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Qualified persons only

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Qualified persons only

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Qualified only

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Qualified only

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Make stricter

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Triage through online advise

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Give the go ahead

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Not allowing this

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Move forward and try it

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

They allow it

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Stop it all together Opticians do Optical things grocery people feed people they don't test eyes. Each to their own.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Too much reliance on NHS when alot of people are Private

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Come away from depending on the NHS for guidance

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

As above

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment,

pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Student dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Providing low vision devices, ready reading spectacles, Rx sports devices, paediatric spectacles or correction, higher-powered spectacles (over +/-8.00)

7 What activities do you think must be restricted to our registrants?

Please provide details.:

All of the above

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

n/a

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes - with no restrictions

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

n/a

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

<16 year old
patients with diminished mental capacity (dementia, autism, post-stroke etc)
high power spectacles
special facial characteristics
low vision/sight impaired

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

na

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

na

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

na

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

na

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

na

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

na

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

na

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

na

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

na

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

na

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

na

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

na

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

na

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

online spectacle and contact lens sale, especially for those under 16 or over +/-5.00

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

online spectacle and contact lens sale, especially for those under 16 or over +/-5.00

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

test the eye
sales of specs under 16
fitting contact lenses
dealing with venerable ptients

7 What activities do you think must be restricted to our registrants?

Please provide details.:

depend on their qualification
ie a dispensing optician should not perform an eye test or do a contact lens check

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

to improve the clinical performance of optom's
Optometrist will be more clinical than retailers

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I don't think it will impact. I believe it will improve the primary care and help the NHS. Pharmacists are taking courses to prescribe and dental hygienists can do health checks.

So moving optometrists to a more valuable area will help diagnosis.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

From where I work referrals are done daily.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

For the purpose of safety contact lenses need to be regulated.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

For the safety of patients and education.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Children's and children with disability.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Get better personal care by qualified opticians.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

restricting the sales of contact lenses would help the user understanding the benifite of contact lens care

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

to prevent eye problems

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

the impact is to do with eye health, having a contact lens check when the prescription is expired will help the patient informed about the changes and rectify any mis use of lenses

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

for health and safety

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

to make sure the supply of sport rx is correct and the fitting as well

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

health and safety

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

health and safety

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

[redacted] is program that enable to help remote health check

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

all I would like to say tech is getting better and GOC need to look into it with an open eye

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

sales on contact lenses online

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Selling of contact lenses

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction and contact lens fitting

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

I was very fortunate to undertake the AOP delegated function course in 1999 at City college London. It was a yearly intensive course one day per week run by [redacted]. It proved very beneficial to us as at that time I was working with 2 optometrists and the smoothness of the practice worked very well and no issues ever arose. I believe the [redacted] still use my course notes to train [redacted] examiners who use the prefix [redacted].

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

As stated above

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

We found it most beneficial until 2013

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Over the years we undertook delegation there were numerous referrals and follow ups

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Should only be fitted by registered personnel

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Again should be fitted by registered personnel

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Allowing unregistered personnel to fit or sell plano lenses is a certain risk to the public

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Many times patients can buy contact lenses over the Internet without a prescription

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

A harder line on Internet sales without prescription

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Selling contact lenses and glasses without a supervising Dispensing Optician or optometrist. All ages.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Selling contact lenses and glasses without a supervising Dispensing Optician or optometrist. All ages.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Optometrists would have more time to focus on the health of the eyes, including processing referrals.

A likely negative is that optometrists may feel unhappy at other professions carrying out tasks that have previously been exclusive to them.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

An ageing population means more demands on optometrists time, so doing nothing now will only increase pressure on optometrists, especially as further training for refraction will take time, so waiting until it's "needed" is a bad idea.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As it is, people can purchase contact lenses online in the UK without a valid prescription and lens fitting. Legislation forbids this, but there is zero apparent enforcement in the field.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

This question doesn't say what those changes could be, so of course there's a risk, for example if zero-powered lenses became sellable without a professional involved, many more people would risk their eyesight.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Many more people will be putting lenses into their eyes that are poorly fitting, the wrong prescription, and will have never been told things such as “don’t use tap water”. It would be a catastrophe.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Minimum standards would be helpful.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

The risks of contact lenses aren’t the prescription, it’s the fact that it’s a physical item being placed on the eye. Differentiating zero-powered lenses is folly, designed to remove work from the GOC and remove safety from the public.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

It is constantly astonishing that there appears to be almost zero enforcement in this field.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The public will continue to be encouraged to speak with professionals that can help them mitigate the risks of contact lens wear.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

We have minimum tolerances for checking prescriptions and measurements for a reason. Telling the general public that they can sell glasses to anyone over 16 is madness when they haven’t had the training to get it right.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients would skip their sight tests, resulting in (a) glasses that are no longer their current prescription and (b) their eye health issues will go unnoticed until it significantly impacts their vision, rather than catching it early enough to do something about it.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A major advantage is that those with prescriptions get the health of their eye checked every two years. It is a great shame that those without prescriptions are much less likely to get their eyes examined, as issues will go unnoticed.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients will get glasses that are made up incorrectly, completely ignorant of the various considerations that are required for dispensing under 16s, including phorias and tropias, the Critical Period, and the implications of various materials.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The public will be less likely to get glasses that are damaging to their refractive health.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

The ability to sell glasses that the owner can change the prescription in (eg, bifocals that are activated by an electric current) should be made legal through dispensing opticians.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Technologies that can help patients are restricted.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Bifocals that can be activated with an electric current.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The restriction on lenses that can have their prescription “changed” by the user.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Unregistered people that sell spectacles should be held accountable for the cost of further sight tests if their product does not meet the patients needs. They took their money, they should be on the hook for fixing problems, just like registered professionals are when they make up glasses to an outside rx.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Make it a specific clause that anyone selling optical appliances is liable for the future costs associated with the product they sold, such as paying for a private refraction if they aren't able to carry it out themselves.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Anything related to eye examinations, without direct supervision of a registered Optometrist.

No involvement in the dispensing of spectacles, visual aids or contact lenses. Any advising on; spectacle frame choice or fitting of finished spectacles or handing over of optical goods (e.g. Contact lenses, solutions or visual aids), must be done with direct supervision of a DO, CLO or Optometrist.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye examination, contact lens fitting and supply, dispensing of spectacles and visual aids.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

LVA supply and any dispensing of spectacles other than basic single vision to over 18s.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

To be able to modify a Rx in cases of intolerance or check an Rx from elsewhere before making up spectacles. This though should only be in cases of no underlying conditions existing, e.g. AMD and retinal detachment.

This should leave Optometrist chair time for full EEs and more clinical needs.

Unsure of any direct evidence of this in actual practice.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Disadvantages;

Eye conditions missed

Liability for Rx resting with Optom or DO

Advantages;

Reduction in wasted Optom chair time

DO having better idea of client's needs
Better equality of status between DO, CLO and Optom

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Protects clients from entrusting their eye health to unqualified practitioners.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage

Continued professional barriers between Optoms amd DOs
Wasted chair time
Reduction in intolerance cases

Advantage

The status quo works

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Contact lens compliance needs correct management by a fully qualified and registered professional to protect long-term eye health.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I can think of no disadvantages, if anything it should be further enhanced to restrict online suppliers.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Depends on changes!

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Any reduction in verification could lead to client welfare problems.

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

Gold standard aftercare methods should be in place, but left to professional interpretation.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Any c/lens should still be considered as a medical device and regulated accordingly.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

See above

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Only an advantage

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage

Clinical conditions missed
Changes in Rx missed
No check on legality to drive
Reduction in Optom employment

Advantages

Convenience for client if happy with Rx
Less unnecessary EEs showing stable Rxs

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Status quo works.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Incorrect advice could lead to poor fitting and sight threatening eye protection.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

- testing sight
- fitting contact lenses
- selling optical appliances to children under 16, including sports eyewear
- selling optical appliances to people registered as visually impaired
- selling zero-powered contact lenses
- dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:
 - highly-developed communication skills,
 - expert dispensing skills, taking into account factors such as facial characteristics and posture
 - an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
 - an ability to judge the decision-making capacity of a patient
- giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:
 - is long-term and potentially expensive
 - has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia may be of value to patients who are over 16, as well as to children.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

- testing sight
- fitting contact lenses
- selling optical appliances to children under 16, including sports eyewear
- selling optical appliances to people registered as visually impaired
- selling zero-powered contact lenses

- dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia
- giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

- dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:
 - highly-developed communication skills,
 - expert dispensing skills, taking into account factors such as facial characteristics and posture
 - an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
 - an ability to judge the decision-making capacity of a patient
- giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:
 - is long-term and potentially expensive
 - has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia may be of value to patients who are over 16, as well as to children.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not Answered

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

To support the optometrist in practice and allow them to concentrate on the inner eye health of the patient.

the full exam will be done in tandem so no risk to the patient of missed pathology

The DO is best placed to perform the refraction bearing in mind the visual task analysis required in order to properly serve the visual needs of the patient in their work, hobbies and lifestyle.

DO's refract (and prescribe) in many other countries of the world with no issues reported whatsoever. It would be a small extension of their scope of practice since the Refractive Management unit currently covers the entire refraction routine as a 'knows how'

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

see above

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Yes, the sale and supply of optical appliances to certain groups of vulnerable patients should be further restricted so that it must be carried out by a registrant. Such patient groups should include people with learning disabilities or dementia because dispensing optical appliances to such patients requires enhanced skills and knowledge.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing optical appliances to people with learning disabilities or dementia requires enhanced skills and knowledge, including:

- highly-developed communication skills,
- expert dispensing skills, taking into account factors such as facial characteristics and posture
- an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
- an ability to judge the decision-making capacity of a patient
- understanding of medical conditions

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not Answered

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not Answered

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not Answered

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not Answered

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not Answered

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These restrictions are necessary to protect the public and should be maintained. We do not agree that the fitting process for such sportswear is 'not as complex' as for spectacles or contact lenses. Sports eyewear is fitted not only to ensure optimum vision but to afford protection to the wearer. Therefore, it is more rather than less complex to fit, requiring detailed questioning about usage and enhanced dispensing skills to ensure a safe, optimum fit. The call for evidence also suggests that the restrictions might be unnecessary because sportswear is 'usually only worn for short periods'. While diving masks, swimming goggles or sport goggles can be worn for short periods, they can also be worn over an extended length of time. In any case, if such optical appliances have not been fitted correctly and/or appropriate advice has not been given, there is clearly an increased risk of harm if a child is unable to see clearly under water or is wearing a poorly fitting pair of rugby goggles. This could also result in harm to team members or competitors.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not Answered

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Business registrant/employer

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Diagnosing eye disease
issuing spectacle prescriptions
issuing contact lens prescriptions

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Activities should not be restricted. Anyone charging money for services should be suitably trained and competent but any restriction should not inhibit a practice team approach to eyecare.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dispensing of spectacles to;
Vulnerable adults
Drivers - of any vehicle, HGV, trains, Taxi's etc
Train drivers
Anyone with Rx over +/- 5.00D
Safety eyewear
Bifocals
PPL's
Monocular patients
People with visual acuities lower than 6/12
People with facial disfigurements

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Refraction - should be supported to train other team members, registered and unregistered to do subjective refraction. Optometrists are doing more and more and a hurried subjective refraction is easily inaccurate, let other team members with more time and less pressure support them by taking this tedious function away from the sole supplier.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Extending regulation of spectacle supply to more restricted groups would better protect the public, HGV drivers wearing specs bought online and unchecked quite honestly makes me wonder if anyone ever thought about the worst case scenario.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes - with no restrictions

Please give your reasons and provide any evidence to support these.:

Refraction is time consuming and in an area where more and more is asked of optometrists let the professions support each other, this is an easy learned skillset that DO's and OA's are well placed to help out with.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It supports the optometrist and gives them more time to deliver other services.

Saves expensive chair time especially in the event of a re test.

If a patient presents with a prescription that turns out to have been done in a hurry and is inaccurate it would allow a dispensing optician to deliver a retest and change the prescription without going back to original optometrist thus saving the patient time and embarrassment.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Allowing other team members to be involved with sight testing is already evident, OA's do visual field tests, none contact tonometry, auto refraction, etc etc. The analysis of the results is still left with the optometrist, I don't see why any part of the process cannot be done by the team to feed into the optom.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We currently don't have enough optometrists, the ones we have want to further their scope of practice and get involved in more advanced techniques so there is a skills gap which could be easily filled without endangering any member of the public

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

I do not support the separation of the eye examination and the refraction, I just think refraction could be done for the optometrist same as fields, pressures, OCT and fundus photo's.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantage would be maintaining the status quo but the fact that overseas supply is unregulated and unregulatable the legislation only impacts UK based business and leaves them vulnerable to predatory overseas suppliers.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Drivers - safety
Vulnerable adults - avoid exploitation
Safety eyewear - need to be correctly fitted to work
Any prescription over +/-5.00D as Rx may need to be compensated for back vertex distance
Those with Downs syndrome - special fitting characteristics
PPL's - badly fitted can be dangerous - falls risk
Bifocals- badly fitted can be dangerous - falls risk
Monocular patients - they only have one eye, need to look after it
Pilots - need to see well
Over 70's - need visual task analysis and consideration of other morbidities
Low VA's - under 6/12 need good patient management

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

All operators of people transport, planes, trains automobiles and HGV's all pose massive threat to public, if they are not optimally corrected there could be collision risk.

Multifocal lenses need to be correctly fitted to mitigate risk of falls. Any Rx over +/- 5.00D needs to have a VD stated according to british standards because the VD could impact on the effective power of the lens at the cornea and may need to be compensated accordingly - you need to be trained to take those critical measurements and how to do subsequent calculation.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

The oversea supply cannot be regulated and this causes confusion with our patients and stops true regulation

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

If we deregulate the supply of contact lenses they will be bought in supermarkets without any appropriate fitting or ongoing health complications being monitored.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

The mass production of contact lenses and massive supply means lenses cannot be individually verified so much verification is left to the manufacturers and registrants check what is written on the packet not whats inside.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

In truth each lens is not verified so very little impact

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

We see horror stories every haloween of people buying gimmick contact lenses without supervision and things going wrong

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

In theory this means all lenses are supplied by someone who understands the risks and knows what to look for when things go wrong

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Making registrants take responsibility for the health of someone's eye if you sell them a pair of ready readers means that this market is given to the supermarkets etc. I think this is unfair and draconian.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

As far as I can see the biggest risk is they may get the chance to talk to an optician and learn about the benefits of having an eye exam and buying specs prescribed to them rather than guessing.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Contact lenses - as above

Some consumer groups as I mentioned above would be better served by legislation protecting them.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

A registrant can better judge what is in the patients best interest and behave accordingly so long as they can justify their action, a non-registrant unbound by a professional code of practice may err on the side of profiteering!

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

They may waste their money. Un detected pathology may go undetected even longer.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

People are restricted in such a way that is in their best interest and a qualified registrant can make the decision to do other if such an action can be justified and it is documented accordingly.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financial benefit would be present because without having to fund a professional salary the retail price could be reduced. Appliances may not be fitted correctly or prescription may be mounted incorrectly and lead to developmental problems.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Children in their formative years need eyewear to be well fitted and appropriately supplied for intended purpose

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I don't think there are any

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Tele optometry is going to be a thing, there is little you can do to stop it and it will be delivered from abroad and thus not impacted by GOC regulation.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes - a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

It's not as holistic as face to face and those on the side lines may slip through the net. By the same token it has been demonstrated that learning machines can perform visual screening etc better than humans without growing tired, needing to be paid, taking breaks or limited working hours.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Currently remote care is not endorsed and all care delivered is by registrants with qualifications.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Not being able to regulate overseas remote delivery will allow this to progress

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Enforce the existing rules and block or close down those that seek to ignore our regulations

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Allowing the supply of "Equivalent" contact lenses is not acceptable

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

prosecution

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The freedom to take your prescription elsewhere to buy specs is a minefield, if people who sold specs could refract the patient again a lot of heartache could be avoided - of course this would also mean the supplier could use their own prescription to give to the patient

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

prevented from Sight testing

Dispensing in accordance with currently restricted categories, but also including those who are vulnerable such as learning disabilities, cognitive impairment including dementia and facial deformities or limb disabilities that make spectacle wear difficult.

Dispense children who are susceptible to myopia and may benefit from myopia management.

Should not be able to sell contact lenses of any power without a GOC registered person providing supervision on the premises.

Unable to sell ready readers of any power without being able to offer appropriate advice and guidance on their use.

Online sales of prescription spectacles

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sight testing

Dispensing and the sale of optical appliances to currently restricted categories and include those who are vulnerable and individuals who have facial characteristics that require consideration for frame fitting and myopia management for children.

Contact lens provision and fitting including zero powered lenses.

Online sale of prescription spectacles.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dispensing optical appliances to vulnerable patients, such as people with learning disabilities or dementia or who require additional considerations due to facial anatomy or disability.

Myopia management, including fitting and supplying spectacles and contact lenses.

Sale of zero powered contact lenses.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

This role should not be given to Dispensing Opticians, it is not a good use of their skills nor does it provide value to patients or Optical practices.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

In my opinion the only advantage is towards corporate optical chains to reduce their costs.

It is a disadvantage to ALL patients and all professional staff for Dispensing Opticians to provide refraction.

There is no advantage to an independent optical business and I see no advantage to an Dispensing Optician to provide a refraction, surely it allows for new pathology to go undiagnosed and missed.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Children under 16 including those who would benefit from myopia management.

Patients with a complex prescription and those who are registered as sight impaired or severely sight impaired.

ALL vulnerable patients, learning disabilities, physical disabilities, dementia and cognitive disabilities, and unusual facial characteristics.

All contact lenses including zero powered.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Providing the most up-to-date and relevant care to those groups of patients that require professional services.

Communication skills and understanding the pathological impacts of their health and having a much broader knowledge and understanding of how their health impacts their vision or cognitive processes.

Children and parents may not understand myopia, the long-term effects ocular health risks or the reasons why myopia management is important.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Contact lenses are a medical device and should only be fitted, prescribed and purchased from GOC registered companies or Individuals. This ensures that patients' health is not put at unnecessary harm.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

All contact lenses sold should be checked against an in date sighttest and contact lens specification that is signed by the Optometrist who prescribed.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Open market free for all and ultimately patient health is put at risk.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Contact lenses of any power should only be fitted by GOC registered individuals. This reduces risk of harm to patients. Patients should not be able to buy zero powered lenses without a copy of a contact lens specification that is in date and signed by an Optometrist.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Yes, to reduce harm to patients.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This age group is restricted, so ALL optical devices for this age group should also be restricted. There should be NO grey area as this causes loop holes.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Bring back restrictions on the sale of ready readers.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Stops individuals wearing them for driving or wearing full time in place of prescribed optical appliances.
This is for the health and safety of all patients and individuals.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Online sales should only be allowed by registered GOC companies or individuals, this reduces risk to patients in purchasing a product that does not meet their needs, falls below standards or not fit for purpose as inaccurately measured.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Yes, close them down and only allow GOC registered companies and individuals to provide this service.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight testing and aftercares

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sale and supply of under 16 / visually impaired
Sight test and contact lens fittings and aftercares

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

N/a

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

There is a high risk of missed pathology and severe consequences for a patient
This could range from a tumour to early indicators for glaucoma

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It would be detrimental for our profession and patients
Many patients we see every week that come for an update of spectacles , once performed the sight test we can pick of pathology and even advise on general health issues
Only recently I spotted an emboli that would have been missed during just a refraction
This patient had a serious of investigations all as an emergency
That is to name one example

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would seriously undervalue our profession and the hard working optometrist who provide a great service to both private and nhs patients

Splitting the sight test would have financial implications to the patients and further the nhs

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Anterior eye health is just as important as posterior

This can be missed by the unqualified eye

You may see cataracts at an aftercare appointment which patient may believe just needs a stronger powered contact lens

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Yes we can't issue contact lenses without performing necessary checks

There are serious implications for contact lens patients that may not follow compliance or who may have serious eye infections that can risk scarring and hence a loss of vision

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

That would be detrimental

We should be educating our patients on the various contact lenses available and fit and supply what is best for the patient based on our findings and their wearing schedules

Most patients are under the impression that all contacts ie dailies are the same

It is our duty to educate them

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

All contact lenses carry a risk of infection or complications whether it be a high plus or Plano

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It is a fair regulatory requirement

Many people could have pathology at an earlier stage however we need to draw the line at something and this seems fair for both patients and optometrists

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Missed pathology would be a high risk

Diagnosis of health conditions could also be missed

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Optometrists should retain the domain of refraction.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Non registrants restricted but perhaps prohibited from cosmetic or otherwise contact lenses. Am tired of seeing these things being sold at chemists and other outlets.

No testing and not supplying spectacles to the usual vulnerable groups.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Our registrants meaning ABDO restricted to measurement and supply of all patients. Also contact lenses if so qualified. Not refraction. Optometrists to refract and perform a full sight test with contacts if applicable. Referring if necessary.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Eye test, eye exam, sight test. Low vision aids, contact lens fit and supply. All the domain of Optometrists.
Fitting and supply of spectacles to patients including vulnerable groups and low visual aids if so qualified.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

First aid. Essential.

If Dispensing Opticians wish to refract, they should use the conversion course.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

On line contact lens suppliers supply lenses often making changes unilaterally. It's not their remit to do this. It should be with a suitably qualified person who's regulated and motivated to assist the patient.

On line specs also produce glasses to an Rx that cannot guarantee accuracy nor trained to check all specifications ie. heights, pd, prismatic effects, tolerances etc. we are trained for this.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

As detailed in the prior question, these on line suppliers should be regulated.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Absolutely. The GOC need to step up and protect the public's sight.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

There's a conversion course for DO's to do if they wish to refract. It is a reduced course of 2 years I understand and not the 4 prior.

This is the domain of the Optometrist, OMP or Ophthalmologist. Having done both the DO and Optom courses, I can say with authority the idea to have DO's testing is unwise in my opinion. Are we protecting the public or not?

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The only advantage (oxymoron) I see to remove the clause would be for the large corporates. The fees for the testing would be lowered.

The catastrophic effects would be many.

The body has not protected our profession very well in terms of non prescription contacts being sold on the net and in shops. The sale of spectacles on the net and these are a medical device, are they not? The owner of [redacted] was a keynote speaker at Optrafair one year! It's about time our livelihoods we're protected by our paid for association.

Step up please. Our profession has been eroded over the years.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

At present, legislation includes Optoms, OMP's et al for the role of refraction. With the event of an on line eye test recently introduced, I think this is the only tech that should be mentioned in addition. The sight test or testing of sight should be carried out by an Optom, OMP or Ophthalmologist be it digitally or not. We need our governing body to recognise our profession and our jobs are under threat and help protect us. At the day end, if the public can get spectacles from the equivalent of a vending machine, there will be no one choosing Optometry and no fees to the body.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Leave Optoms OMP's and Ophthalmologists to do the reflection and do what they're trained for. Impact will be that public get a thoroughly trained practitioner doing what they have been trained for and looking out for any further potential problems that they have been trained to look out for. These in all likelihood would be missed, which would be a travesty.

As previously mentioned, unregistered selling of contact lenses and spectacles must be included. This, in addition to halting the on line presence of auto testing that's just been advertised.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

However, it may be a prudent move to ask all registrants to take note in a named week, say first week in August to diarise how many referrals are made. You could ask for subsections ie check bp, diabetes reports, cataract referrals etc. then our case for retaining the refraction would be secured. Erosion of our profession should not be tolerated.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

See reply to 19.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

This needs to have a section on cosmetic or Plano lenses. Has there been and prosecutions for any supplier? If so, I've not seen any.

Perhaps it may be prudent to bring a case.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As detailed, on line and shop sellers are still selling these lenses. Are these not a medical device? If not, why not? The body should be bringing these suppliers to task. Also on line contact lens suppliers also sell directly to the public. This is unacceptable also. It's another example of the profession being eroded.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

How can this be regulated?

How do we know if these on line places aren't already supplying these groups. Are they monitored and regulated?

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The body would have to regulate these on line places. Are they checking that they are only supplying over 18's with no pathology?

More should have been done to regulate this.

Pd's are asked for and high Rx's are regularly being dispensed.

On receipt of the frames and lenses, where do you think the Px's go to get them adjusted?

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Never mind Rx contacts. These are occasionally supplied with a different lens to what's specified. Who makes that decision. We are trained in these things. The body should restrict all supply if not by a qualified practitioner. This would include Plano cosmetic lenses.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

I think the regulations should keep it at the professions domain. These outfits are just about capitalising on the sales. Of course there's a small print saying see your eye care practitioner if you have any problems. Just typical. Passing the buck.

We already are having to write down specifications of lenses.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

As detailed on the last poser. The Rx for the contacts on a prescription enables on line purchasing. A gateway to problems that we have to deal with. Suppliers giving lenses near not exact to the Rx and we are made to write down the specifications. Unbelievable. Of course it's for the Patient's records, not for any other reason. ...

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I think this would be a good move. It would mitigate our involvement of patients getting the wrong/potentially harmful incorrect lenses supplied. We should go further to prosecute any independent or body corporate that supplies any Plano lenses.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Too many px's get on line lenses easily and perhaps don't attend for aftercare. It's all too easy for these on line suppliers to say in small print we advise you to visit your eye care practitioner (for which a fee MAY be charged).
I think the px has to have been for an aftercare within the last 6 months in order for a contact lens to be supplied. The specification given maybe to only last for a period of 3 months. Or not have to be supplied at all. Even better.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

These lenses are supplied easily on line. In my opinion this should be outlawed. Public need to be protected. They are, after all a medical device, are they not?

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

All problems associated with contact lens unregulated wear. The danger to the public can be catastrophic.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Yes it should be regulated to qualified persons only. Perhaps a high profile case would highlight this. The body needs to make an example of a supplier. We are, after all required to protect the public, even if it is from themselves.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A section in the legislation about these Plano/cosmetic lenses outlawing their supply if not qualified to do so.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The regulation is too soft. On line spectacles particularly with no PD varifocals for goodness sake with average heights and pd's. We are a body that is supposed to protect the public. I cannot understand why these companies have not been prosecuted.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Risks are with higher Rx's and multifocals of any kind. The sited give videos on how to measure centres etc. our profession is not respected and minimal has been done to enhance the public on our profession either. This must change.

The slogan "if you can read this, thank a teacher" was good. Maybe we can use this too. "If you can see this through your specs, thank an Optometrist". Just a thought.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Absolutely essential. We check the powers and look after the Px. They are our priority. There's a world of a difference between a Patient and a customer.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

I would go further and say if the Rx is over a year old, the Rx should not be supplied. Powers can change overnight. We are protecting the public, are we not?

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

What's to stop a person using a 10 year old prescription to get outdated spectacles? The regulations should be altered to say and Rx that's more than a year out of date should not be done. Maybe even 6 months.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It should be changed to say a year not 2 years for the Rx.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Like any other optical Device, an under 16 has the protections that are necessary.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

For goodness sake. This is for under 16's. They are a vulnerable group and as such shouldn't be supplied from outside the profession.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We supply and check the specifications that we are trained to do. These are under 16's and should be afforded the protections we facilitate.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Plano/cosmetic contacts.
Diving/sun specs/on line ordering.

We are trained to do these things. These companies are not regulated. This may lead to incorrect devices. The public should be protected.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As detailed in the last question. Wrongly powered/centred/heighted lenses.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Remote testing. [redacted] have released an on line test for myopes up to presbyopia. I watched their introduction. It uses on line facility to produce a refraction which claimed accuracy. So again, the profession is being eroded. It was a refraction but not called one. Surely the association knows about this?

I urge something to be done to halt this from unregistered people.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

How can this possibly be better or more accurate than a trained person? I'm not a Luddite but have, over the years seen our profession being eroded. This is just another example of this. What's the point in doing all our training, exams and pay for a body that does not do it's utmost to protect the public and our profession?

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Maybe there should be.

[redacted] needs looking in to. Re the refraction of pre presbyopia myopes.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The [redacted] refraction as previously detailed.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

The profession should scrutinise this company and make sure the public are protected from such endeavours.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Make sure no supply of any vulnerable groups, Rx is within 6-12 months and make sure all measurements are accurate. This I know is impossible. Prismatic effect alone would likely not fall in to tolerances from the Inaccurate pd and heights from the varifocals dispensed.

That is not to say that the pd would have to be supplied. This is not something that we should have to specify either. It's bad enough we have to record the contact lens specifications. That would be a particular nail in the optometric coffin.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Rx 6 months old or less.

Guarantee the Rx is accurate.

Guarantee the heights are accurate.

Guarantee the centres are accurate.

Guarantee the frame fits.

None of these of course can be guaranteed.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

To include saying refraction to be performed by Optometrists, Ophthalmic Medical Practitioners or Ophthalmologists only. No such on line tests to be authorised and unless the accuracy can be guaranteed No on line spectacles should be sold.

The provision contact lens (Plano/cosmetic or otherwise) should also not be sold, unless by a registered and suitably qualified Optician.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Look in to the on line [redacted] refraction for young and pre presbyopic myopes.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not Answered

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

testing sight

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear

selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:

highly-developed communication skills,

expert dispensing skills, taking into account factors such as facial characteristics and posture

an understanding of medical conditions, such as dementia, and the impact they can have on vision and a patient's behavior

an ability to judge the decision-making capacity of a patient

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

is long-term and potentially expensive

has the potential to reduce the risk of eye disease later in life, as well as slow the development of myopia

maybe of value to patients who are over 16, as well as to children.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

testing sight

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear

selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:
highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:
is long-term and potentially expensive
has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia
may be of value to patients who are over 16, as well as to children.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not Answered

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

there should be a consistent approach to business regulation, recognising that some activities are within the control of businesses as opposed to individual registrants, such as ensuring that:

there is the right balance between clinical and commercial incentives
there are appropriate standard operating procedures
equipment is maintained correctly and staff are properly trained to use it
All businesses carrying out restricted activities should be required to register with the GOC and comply with its business standards.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

No, when the GOC considered this question in 2013 it concluded that the risks associated with business practices did not warrant an inspection regime. Since then, the GOC has strengthened the system of business regulation by introducing more comprehensive business standards that make clearer its expectations.

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

Urgent - act now to respond to the
GOC consultation on the Opticians Act
Respond by 18 July

Last week we let you know about some of the key issues for dispensing opticians and contact lens opticians within the GOC consultation on their 2013 statement and the Opticians Act.

Thank you to all who have responded. If you have not yet completed the online form, we strongly encourage you to do so by 18 July when the consultation closes.

While [redacted] is responding to all 55 questions, you don't have to answer every one. The ones that we recommend focusing on are listed below with the points we will be making in the [redacted] response.

We hope you find this guidance helpful and if you have any specific questions please email [redacted] :

Restriction of activities
Refraction
Restrcting the sale of optical appliances
Supply of sports eyewear to under 16s
Regulating businesses

Restriction of activities
Consultation question 6. What activities should non-registrants be restricted/ prevented from doing?

[redacted] view is that the overarching need to protect the public makes it necessary to continue to prevent non-registrants:

testing sight
fitting contact lenses
selling optical appliances to children under 16, including sports eyewear
selling optical appliances to people registered as visually impaired
selling zero-powered contact lenses

In addition, the GOC should take account of developments in practice that have occurred since the legislation was last reviewed and prevent non-registrants from carrying out the following activities either directly or under supervision:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:

highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:
is long-term and potentially expensive
has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia
may be of value to patients who are over 16, as well as to children.

Recognising that legislative change could take some time, the GOC should review its standards of practice and standards for registered businesses to make clear what constitutes good practice for the benefit of patients.

Consultation question 7. What activities do you think must be restricted to our registrants?

In order to protect the public, the following activities must be restricted to registrants:

testing sight
fitting contact lenses
selling optical appliances to children under 16, including sports eyewear
selling optical appliances to people registered as visually impaired
selling zero-powered contact lenses
dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia
giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses
For more details, see answer to question 6.

Consultation question 8. What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

All the following activities should continue to be restricted:

testing sight
fitting contact lenses
selling optical appliances to children under 16, including sports eyewear
selling optical appliances to people registered as visually impaired
selling zero-powered contact lenses

Consultation question 9. Are there any additional activities that you think should be restricted to registrants?

The GOC should take account of developments in practice that have occurred since the legislation was last reviewed and restrict the following activities to GOC registrants only:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:
highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:
is long-term and potentially expensive
has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia
may be of value to patients who are over 16, as well as to children.
Find out more and respond here

Refraction

Consultation question 15. Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

The GOC states in the call for evidence that, "dispensing opticians could undertake refraction for the purposes of the sight test if they are appropriately trained, competent, overseen and indemnified." They go on to say that this would be possible only if they were to amend or remove its 2013 policy statement on refraction.

[redacted] supports the GOC's view that dispensing opticians should be able to undertake refraction for the purposes of the sight test, subject to the stated conditions. Therefore, the GOC should amend its 2013 statement on sight-testing to enable this to happen.

We also recognise that refraction by dispensing opticians for the purposes of the sight test should be under the oversight of an optometrist or medical practitioner so that patients will continue to benefit from an eye health examination in conjunction with a refraction. This is a major strength of the UK's system of eye care and enables eye and wider health issues to be identified and addressed at an early stage in line with the wider health policy focus on prevention.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Enabling dispensing opticians to refract as part of the sight test under the oversight of an optometrist or medical practitioner would be a limited change to the GOC's 2013 statement on sight-testing. What is often overlooked is that this statement already allows dispensing opticians to refract outside of the sight test, e.g. to check a prescription.

The training needed to enable dispensing opticians to carry out refraction as part of the sight test would also be limited. They already learn about refraction as part of their initial education and [redacted] would provide additional training so members' skills and knowledge are up-to-date. The GOC's new outcomes for registration will ensure that future DOs are fully versed in refraction from the outset.

Enabling dispensing opticians to support optometrists and medical practitioners in carrying out sight tests would enable patient care to be provided in a more flexible way while upholding the principle that a sight test should involve both a refraction and an eye health examination.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

the sale and supply of optical appliances to certain groups of vulnerable patients should be further restricted so that it must be carried out by a registrant. Such patient groups should include people with learning disabilities or dementia because dispensing optical appliances to such patients requires enhanced skills and knowledge.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing optical appliances to people with learning disabilities or dementia requires enhanced skills and knowledge, including:

highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
understanding of medical conditions

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not Answered

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not Answered

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not Answered

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not Answered

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not Answered

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 does not create any unnecessary regulatory barriers.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These restrictions are necessary to protect the public and should be maintained. We do not agree that the fitting process for such sportswear is 'not as complex' as for spectacles or contact lenses. Sports eyewear is fitted not only to ensure optimum vision but to afford protection to the wearer. Therefore, it is more rather than less complex to fit, requiring detailed questioning about usage and enhanced dispensing skills to ensure a safe, optimum fit.

The call for evidence also suggests that the restrictions might be unnecessary because sportswear is 'usually only worn for short periods'. While diving masks, swimming goggles or sport goggles can be worn for short periods, they can also be worn over an extended length of time. In any case, if such optical appliances have not been fitted correctly and/or appropriate advice has not been given, there is clearly an increased risk of harm if a child is unable to see clearly under water or is wearing a poorly fitting pair of rugby goggles. This could also result in harm to team members or competitors.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not Answered

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Submitted to Call for evidence on the Opticians Act and consultation on associated GOC policies
Submitted on 2022-04-25 19:56:44

Tell us who you are

1 What is your name?

[redacted]

3 Which category best describes you?

Other - please specify

If 'other', please specify.:

Ophthalmologist & Medical Advisor

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

The challenge of a new Opticians Act will be to find an equilibrium between affordable/accessible care vs. safety for the general public.

The more risks a particular optical activity entails, the more important it becomes to regulate it. In my opinion, there are several activities restricted to GOC registrants:

1. assessing the refractive error in minors (<12yo)
2. fitting and selling of new contact lenses (soft/RGPs)
3. supplying low vision aids
4. manage low-complex non-urgent eye diseases, such as dry eye, blepharitis, dry macular degeneration, diabetic retinopathy screening, or ocular hypertension.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

I interpret this question as the need to give a listing of activities that surpass the basic competence/knowledge of a typical registrant:

1. establish new diagnoses other than refractive or orthoptic errors
2. prescribe drugs or eyedrops containing pharmacological active agents
3. perform (laser)surgeries to the eye or peri-ocular tissues.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Not sure / no opinion

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should not be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

See 7.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

I think the surge in healthcare demands will prove an opportunity for opticians and optometrist to play a vital role in eye care. Transferring low-complex non-urgent eyecare to registrars requires post-registration qualification/training, and a register informing the public on the competences of the registrant.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

The 2013 review lacks the digital transformation that eyecare is currently experiencing, and the possibility to deliver remote optical care should be added. Here, the GOC should again find equilibrium between accessibility/affordability of care, and safety to the public.

Deregulation of care provision in location (i.e. enabling remote measurements & prescriptions) will greatly increase the accessibility of care. To maintain safety and quality, the GOC should impose standards on the safety of medical devices (i.e. UKCA, comparable to the EU Medical Device Regulation)

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Deregulation of care provision in location (i.e. enabling remote measurements & prescriptions) will greatly increase the accessibility of care.

Self-assessments of visual function and checking of prescription glasses democratizes eyecare and will have a positive effect on health equality, since less means and less time needs to be devoted to check one's visual acuity online rather than in-office/in-store.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

I am not familiar enough with the framework of other entities that perform health inspections. One entity with the right to inspect and enforce should suffice.

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

The GOC is a complex entity, and a separation between rule-making, rule-enforcing, and appealing could strengthen the regulatory framework for opticians/optometrist.

And interesting example is the Dutch model. Optometrists & orthoptists are associated, issue quality guidelines, and have an official quality register. Opticians and optician stores are associated, with their own quality guidelines. Ophthalmologist also have an official quality register and are regularly & obligatory inspected by their peers.

The eye-care associations collaborate quite effectively in bringing safe and effective care to the public.

The Health Inspection (ministry of health) can inspect & enforce registered health providers, as does the Authority for Consumers & Market for optician stores.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

The relative safety of refractions allow dispensing opticians to issue prescription glasses.

No lasting or serious harm is expected in an extent that offsets the benefit of increasing access to care. Wrong prescriptions can be replaced, and the (remote) oversight of an optometrist in the process aids in maintaining a standard of quality.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

First and foremost, allowing dispensing opticians to refract will greatly improve access to eyecare, and potentially reduces the costs of refraction. This is good for health equality and for the general public, who pay less for a comparable service.

The major downside is that an optometrist refraction entails a more comprehensive examination of the eye and vision related complaints, leading to a higher quality, at a presumed higher price-level.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Access to vision testing is essential to create awareness of poor eyesight and reduce its societal impact. The best way to do so is by making vision testing easier available. This can be achieved by deregulation, effectively allowing web-based/remote self-assessment of visual function.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Current restrictions in vision testing puts an unnecessary barrier in the eyecare process. These restrictions lead to less vision testing, less awareness, and a bigger impact of poor sightedness in the general public.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

In the Dutch situation, opticians are allowed to issue prescriptions, but not to establish diagnoses other than refractive errors. Since the majority of vision loss is due to uncorrected refractive errors, and the optician can follow-up after a sale, there is little lost value by skipping the eye health check. Self

reported complaints (pain, red eye, acute vision loss) trigger the need for an eye health check, and here the optometrist plays a vital role (either on location in the store, remotely in the clinic, or digitally).

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The fitting of new contact lenses should always be done by an eye care professional (i.e. a contact lens specialist), as are replacements of RGP-lenses.

Soft-contact lens renewals are less complex and entail less risks. I consider that this can safely be done by dispensing opticians, or remotely.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Again, access to care and lower anticipated costs are possible, lest judicious management of this process is overseen by the GOC.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

I consider that dispensing glasses are safely possible by dispensing opticians from 12 year onwards.

For dispensing low vision aids, I'd advise to have additional training, or restrict this to specialized optometrists.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Lowering the age to 12 (in stead of 16), liberalizing the issuing of prescriptions to opticians, and the ability to perform remote digital assessments, will all contribute to better access of eyecare and a lower price. There are no solid arguments why the assessment of visual acuity or refractive assessments is fundamentally different for a 12yo compared to a 16yo. Both need a form of parental consent of course, but medically, the cases are identical.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n.a.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

as mentioned before, a liberalization of the optical care, will increase the access to care. This is a good thing, particularly for screening purposes, as neglected porsightedness/blindness is treatable in 80% of the cases, also in Western Europe. The major drivers for poor sightedness are uncorrected refractive errors and cataract, both diagnoses that a optician can establish, or at least screen for.

Digital remote screening of elderly (for instance by a home care nurse) has a proven effect on the identification of porsightedness in a home care population. These patients can be referred for visual aids or optical appliances. A lower entry to the identification of these cases, will improve general wellbeing.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I suppose upselling of optical appliances by commercial entities is a relevant threat to the budget. This could be curbed by either additional training/registration and by a separation from sale and reimbursement.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

As mentioned above, I think it is wise to implement a strict evidence-based reimbursement system for optical appliances to ascertain health equality whilst curbing the societal expenditures.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

This can be argued in several ways, but predominantly, one could question whether a prescription should be renewed every two years by an optometrist.

If a patient/client rates the quality of vision with is prescription as good/excellent, and a vision screener identifies that the visual acuity is on par/unchanged, why should one than be referred to an optometrist to redo the measurement. The chances that this investigation will create added value is small, while the costs are almost the same for a new prescription, or a complex prescription.

Liberization of dispensing by imposing vision checks (either in store, or remotely at home) rather than by imposing costly optometrist refractions, can reduce the costs of optical care, whilst maintaining its quality.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n.a.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n.a.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n.a.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n.a.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n.a.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

We develop and clinically validate technology for the remote assessment of visual acuity, reading acuity, and refractive errors. We are the world first certified online eyetest, and have an ongoing research program. please see [redacted]

The scientific results are published open-access by Wisse et al. JMIR 2019.

The recent 2022 London 100% Optical trade event underlined the acceptance of digital tools for remote screening and issuing of prescriptions in the UK.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

increasing access to care improves the democratizing of care: self-measurements are related to self-awareness, and can reduce the burden of blindness and poor eyesight by identifying cases with preventable vision problems.

In addition, digital tools have the power of scaling and cost-reduction. Visual acuity screeners can be self-performed with automated outcomes directly available to the user. Refractive assessment can be levied out of the office/shop, and transferred to the comfort of one's home.

Reducing the amount of visits to the hospital/clinic have proven the highest impact on cost-effectiveness for eHealth solutions in general: the societal costs for travelling, unproductive time etc are seldom accounted for, but do add to the societal costs of eyecare. These are greatly reduced with valid home-testing.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

It is unclear how the GOC manages/enforces business development of a digital transition. It should be made possible to deliver eyecare remotely, either automated or under the supervision of an optometrist. It is unclear whether this is/will be allowed, whether supervision is mandatory, whether supervision should be done by an optometrist, whether this optometrist should be UK based and/or GOC registered, whether the GOC will play a role in appeal cases, whether the GOC has any voice in the market entry of new digital players. etc. etc.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

There is virtually no framework on how to handle the GOC guidelines for remote eyecare, nor is it predictable how the GOC will rule when cases are taken for appeal.

After Brexit, the UK now has its own certification system for Medical Devices, but is unclear whether the GOC will enforce that digital/remote vision testing should always be done with a certified Medical Devices (either CE or UKCA). I believe it should, since certification puts high standards on quality management and clinical validation.

Another issue is that it is unclear whether the GOC will propose additional labels/checks to prevent risks to patients. I consider that 'augmented intelligence', where a remote digital procedure is supervised by a UK-registered optometrist should be the best equilibrium between quality and accessibility of care.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Yes, open discussions with stakeholders, patients, digital health developers, legislators, and regulators, preferably also from other countries as to have an open mindset to possible solutions.

(I'd be happy to come over to the UK..)

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

making eyewear more generally available to the public will increase competition and lower consumer prices. online sales have the potential to cut costs, and it's an industry fact that prescription glasses have a fair retail margin currently. this is not in the interest for consumers.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

I'd advise to deregulate. In the UK, the prescription is already decoupled from the dispensing. Both process could be offered online, and both would increase the access to prescription eyewear at lower costs than currently.

Importantly, with a shrinking work force, and increase eye care demands, we all need to look for solutions to keep our care delivery sustainable. This is the major challenge of our time, and the Opticians Act should play a pivotal role in addressing and enabling the needed digital transition in eye care.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Other - please specify

If 'other', please specify.:

Optical manager

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Dispensing restricted category's
Interpretation of clinical exam data

7 What activities do you think must be restricted to our registrants?

Please provide details.:

See previous answer

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

With no or little refraction taking place, the optometrist could spend more time discussing eye health with the patient and also in a potentially shorter test slot time, which for routine patients, would help reduce the post covid back logs

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient safety and quality of care

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Patients can buy online without a prescription regardless

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Mental disability, conditions where are unable to provide consent

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Greater patient care where a optical assistant may miss an aspect of the dispense that could effect optical quality.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Customers would buy online and not from practices who could intervene where needed to prevent eye conditions.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

These products are not quality checked

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

They could get glasses at short notice however this could put off regular health checks

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

OTC devices such as rx swim goggles are not permanent corrections so should be able to be sold as an accessory.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Working in an nhs EECT during covid

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Increased access to healthcare

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Reliable platforms, patient expectations

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Not enough enforcement of restricted category's, no responsibility for prescription non tol issues, taking PDs etc.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

More awareness of the proper routes for recourse in the event of a non tolerance issue

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Finalising/communicating decisions on patient management without oversight by a registrant.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Confirming management plan for patients, signing off prescriptions of medications

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should not be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Regular auditing & feedback would be beneficial to businesses

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes - under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

Sight testing as a delegated tasks to help with resource issues with optometrists, especially in hard to recruit/remote areas, also to allow optometrists to focus on ocular health rather than refraction

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantages - optometrists can spend more time on ocular health, helps any resource or recruitment issues

Disadvantages - financial investment in DOs additional training, likely increased salary cost of DOs

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Time pressure on optometrists to carry out more tasks during appointment rather than focussing on ocular health.
Potential of technology like [redacted] may be able to do this task

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

Approx 5% in my practice

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Sometimes if aftercare is in date but sight test has expired

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Potentially greater number of complications if non registrants are not trained to appropriate standard

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Under 10 year old
High prescriptions over 10D
Visually impaired

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Further restrictions may make it harder for vulnerable patients to access optical appliances

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Potentially great complications if training is not up to standard

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

More patients going online to access contact lenses meaning they could buy any type/spec and potentially increase complications

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

As it is still a piece of material going in the patient's eye there is a still a risk

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Eye health not being checked and potential ocular issues going undetected.
Patients wearing wrong prescription, especially if a driver/operating machinery

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Restricted access means less likely to buy/more difficult and expensive - if more accessible then more likely parents will buy and therefore more children will have protection

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Potential remote eye testing where an optometrist does a virtual consultation with a delegated registrant operating equipment

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

More delegated functions, more focus on ocular health, ability to provide eye care in hard to recruit areas

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

If only optometrists are able to carry out sight tests then the issue of resource is not solved

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Potentially people buying poor quality/faulty products that are not up to standard

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

No, you will find specific details in the answers I have provided throughout. The objective should be to tighten regulation in the interest of protecting the general public.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

All those activities I have listed in question 7 as each may pose a risk to the health of the general public and specifically those receiving the service.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Testing of sight (all aspects including but not limited to health assessment, BV and refraction)

Fitting and aftercare of contact lenses

Selling optical appliances to children under 16 and those registered visually impaired

Selling zero powered contact lenses

Selling/dispensing optical appliances to those with prescriptions of +/-5.00D and above due to the potential need for vertex distance compensation, that can otherwise risk being overlooked or miscalculated.

Selling/dispensing/fitting safety eyewear in the interest of public health protection.

Selling/dispensing optical appliances to those with severe learning difficulties, disability or special facial characteristics where more consideration is required in determining appropriate lens and frame choice as opposed to an "off the shelf" solution.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Selling/dispensing optical appliances to those with prescriptions of +/-5.00D and above due to the potential need for vertex distance compensation, that can otherwise risk being overlooked or miscalculated.

Selling/dispensing/fitting safety eyewear in the interest of public health protection.

Selling/dispensing optical appliances to those with severe learning difficulties, disability or special facial characteristics where more consideration is required in determining appropriate lens and frame choice as opposed to an "off the shelf" solution.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Undoubtedly we should work for the improvement of the industry and improved standards of care for the general public. I do not have specific information on additional qualifications/training but I support further accreditation in relative fields which should be promoted as in the context of glaucoma and medical retina certification and the IP specialty. It is important these qualifications/accreditations are well considered and I do not support the idea of dispensing opticians refracting through such accreditation as it is too intrinsically linked with the binocular and health status of the patient to become a separate function.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

In my view it is important that any businesses providing optical services and/or appliances to the general public are registered with the GOC and meet the appropriate requirements that allow them to do so. Route to registration and regulation for business should be uniformed but robust and with strict criteria around compliance with current GOC regulation.

Regulation should tighter as opposed to being relaxed, in the interest of maintaining high standards within the profession and protecting the healthy and safety of the general public. Criteria should prevent rogue companies operating in ways that are illegal, unethical and unsafe e.g. preventing unregistered businesses from selling contact lenses that the general public can obtain without a valid prescription, specification, fitting or even any general point of intervention that could protect them.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

What must be understood is exactly what is implied by "simpler and more effective" business regulation. If in simplifying regulation the result is simply diluting the standards of the industry, resulting in lower quality across the board, then this is simply unacceptable. Easier is not always better, particularly when dealing with peoples health and wellbeing. Compromising on quality is not and never will be the answer, it would simply be negligence.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Yes however these powers would need to be used with the right intention and not abused. The primary agenda should be to protect the public whom we serve as registrants and equally to protect our registrants and the profession as a whole. Tighter standards are necessary to achieve all three of these. Powers of inspection, in my opinion, would grant the GOC greater power to intervene in the interest of public safety but should be used to maintain tight regulation of not only individual registrations but the function of the whole optical sector in the UK.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

The GPhC is a sensible model however the responsibility for regulation and standards should not fall on one individual. Many optical practices employ numerous Optometrists, DOs, CLOs and are owned/directed by registrants. The business owner/board/directorship should be regulated, as should the individual registrants working within these companies.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

As a dispensing optician (CLO) and now student optometrist I do not believe it is in the best interest of the general public for refraction to be performed by dispensing opticians, either with or without "oversight" or supervision.

As any Optometrist will know that a thorough and accurate refraction requires underpinning knowledge of (among other things) accommodation, binocular vision and ocular motility. These areas are themselves then linked to other factors such as the ocular health status. Reduced visual acuity can of course also indicate underlying pathology. Therefore the separation of refraction from the rest of the eye examination (namely the BV status and health assessment) is completely unacceptable and likely only to encourage negligence. The appropriate tests all need to be conducted by the suitably qualified optometrist.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I believe that the only motive for deregulating refraction/enabling DOs to refract is monetary and driven by both profit and greed and is not at all in the interest of the profession as a whole or the general public. Some companies will use this as a way to churn out dispenses with the sole goal being profit, this does not align with the high standards to which we hold ourselves in the industry as is akin to bringing the profession into disrepute through the encouragement of negligence.

The negative impacts include (as previously mentioned) the separation of eye health assessment, binocular vision assessment and the refraction which are all very much interlinked. Whilst a DO may be able to understand the steps of refraction they are not trained in BV, anatomy or pathology to the extent of the Optometrist and therefore cannot truly perform an accurate and comprehensive refraction with all the necessary considerations. The Optometrist is already trained and qualified to perform these functions safely and to make the necessary links. I say this as a DO/CLO now studying Optometry, who has become acutely aware of the difference between learning the steps of refraction and actively refracting as part of a thorough vision and health assessment through my university clinics.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The legislation as it currently stands serves to protect the general public and ensure high standards are maintained across the profession. If anything, arguably elements of the legislation should in fact be stricter to enable more adequate protection e.g. preventing sale and supply of contact lenses by rogue companies, the dispensing of spectacles to vulnerable groups etc. The legislation should certainly not be changed in any way that lessens current regulations, this will only put the general public at risk and cause the destruction of the profession.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantages are that the general public is safer (full and comprehensive eye exams), less confused (simpler structure of services - less fractured and convoluted), refraction will be performed to an appropriate standard (considering BV, motility, accommodative issues, pathological/anatomical factors) resulting in better long-term outcomes. Generally higher standards will be maintained across the industry which is something we should continue to pride ourselves on.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

I do not have information on this but it is easily researched and I do not feel it is in anyway relevant to the line of questioning. If the implication that DOs refracting will free the Optometrist up for a purely "health led" consultation and ultimately reduce referrals to secondary care, I think this is a gross misjudgement. With DOs refracting I think the chance for overlooked BV anomalies and pathologies will increase exponentially and the outcome will be worse for patients who fall victim to the negligence this proposal creates. As a result secondary care will eventually be under further strain.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

You need only look at the syllabus for a DO course at any of the current establishments to realise that the current training and knowledge level of a DO is not sufficient to undertake such activity proficiently.

Even with additional training I do not believe it appropriate to consider this separation of activity, as unless the DO is converting into Optometry they will not truly have the understanding required (as discussed in an earlier answers) to ensure the refraction is accurate and appropriate when they are unable to make other assessments in regards to BV status, accommodative status and ocular health.

This is not a criticism of the DO, I am a DO/CLO myself (now studying optometry), but the type of registrant sufficiently trained to undertake refraction is evidently the Optometrist and there is no need make the industry more convoluted. A DO would need to undertake extensive training to the point they may as well undertake an Optometry program. This proposal serves no purpose.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It is important that the fitting, sale, supply etc of contact lenses remains tightly regulated in the interest of public safety. Incorrect/inappropriate fitting and/or supply has the potential to negatively impact the vision and/or eye health of the patient (potentially permanently). This could also impact the wider public if the affected individual whom has a reduced VA from inappropriate lens fitting, for example, operates heavy machinery, drives privately or commercially (taxi, school bus, lorry), handles medication or is in any other position that could cause harm to themselves or others resulting from substandard acuity.

Time and time again in practice the consequences of poor contact lens instruction, tuition, fitting and supply are seen when patients purchase lenses online and neglect to ensure regular aftercare. They do so without understanding the risk to their eye health and vision, often as a result of neglect from online suppliers. It should not be possible for the general public to purchase contact lenses like sweets, they are a medical and optical appliance and it is important therefore that they are only fitted and supplied by those who are registered and adequately qualified.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantages are evident from my response to the former question (Q21), where I state the consequence of relaxing this legislation. Tighter regulation should be sought to deal with neglectful online suppliers operating with the sole purpose of profiteering, often at the expense of the general public whom we as registrants seek to protect. As contact lens products continue to advance it is even more important that supply is only via qualified and registered practitioners as the complexity of a myopia management, multifocals, torics, orthok, sclerals etc. required specialist knowledge and expertise to achieve the correct results.

Also, when considering any form of refractive correction we must consider BV. A contact lens specialist or optometrist will understand the impact of a refraction/cl over-refraction on BV. These consequences of poor correction cannot be understood by an unskilled business or individual.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

As stated, sale and supply to under 16s and the visually impaired should remain restricted. In addition sale and supply should also be restricted to those patients with a prescription exceeding +/-5.00 due to the impact of vertex distance and possible compensation (as well as increased prismatic effect from incorrect centration). Certainly, prescriptions of +/10.00 should be restricted as these impacts are even greater.

I feel it is also important to restrict the sale and supply of safety glasses as there is generally very inadequate training of optical assistants or other non-registrants. They should not be in a position to determine appropriate lens/frame choices for a patient where the patient's company have not specified via their H&S officer.

Furthermore, clinically vulnerable patients including those with severe learning difficulties or disability (including those with Visio-spatial or auditory-phonetic SLD) should also be restricted as registrants with prior learning will be in a better position to provide appropriate care and solutions.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The main advantage is that the public whom we seek to protect are better protected, supplied with more appropriate optical appliances/solutions for their needs and lead a better quality of life as a result.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No, they do not create any unnecessary barriers, contact lenses are an optical/medical appliance and should be regulated as such. It should not be possible for people to buy them like sweets and put their eye health/vision at risk. Furthermore, the general public should not be able to acquire contact lenses without a comprehensive fitting as they can pose a risk not only to themselves but others e.g. if their visual acuity is subpar. It's not unusual to see patients in practice who have self prescribed and fall below driving standards despite operating heavy machinery or driving commercially. If it is made any easier for unregulated sellers to operate then these sorts of problems will only increase.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Without a shadow of a doubt these requirements should be stricter to better protect the general public. There should be no further relaxation/deregulation of these activities.

There is an FTP case I am aware of at the moment where a registrant is being investigated for issuing a new brand of contact lenses to a patient without appropriate fitting. That they have done this is of course wrong but it makes a mockery of the current system that they can be chastised for this action as an individual yet online businesses can sell contact lenses freely without any verification.

Similarly to the issues I've already outlined, the relaxing or removal of supervision/general direction requirements will increase the risk of inexperienced and untrained colleagues issuing contact lenses to patients without appropriate fitting, instruction and care. This should not be possible.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No as these requirements are there for the wellbeing of the general public/patients. Any lesser requirements create greater risk would be akin to negligence.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Most businesses who claim to verify such specifications evidently do not as working as a CLO in a busy multiple practice I am yet to receive a single phone call to the department from any online suppliers of lenses for such validation. I believe if these companies were sufficiently audited they would not be able to produce evidence that verification is routinely performed.

Supply of contact lenses without verification/validation puts the consumer at risk and perpetuates this damaging notion that you can stick anything in your eye without ramification. As a CLO I too often see patients who have fallen victim to companies such as [redacted] and [redacted] who have been lured in by a cheap deal and a marketing ploy and end up with corneal events, poor VA, poor comfort/lens tolerance all due to lack of proper fitting and aftercare. Not the mention that many who fall victim to this only attend for AC every 3-4 years as the casual nature of the purchase leads them to believe regular AC is unnecessary.

A contact lens is considered an optical appliance/medical device and should be regulated as such. They have the potential to cause irreparable damage the eyes/eyesight through incorrect use and it is in the interest of the general public that they are dispensed only with the appropriate care and advice.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

It would not hurt for aftercare to have a definition, providing that definition is appropriate and incorporates all important aspects of the aftercare and is not used to dilute requirements.

Undoubtedly an aftercare should at the least include:

Reason for visit/chief complaint

History and symptoms including POH/FOH/PGH/FGH

Wear and care compliance (cleaning, care, hours per day, days per week, I&R etc)

VA assessment and over-refraction

Fit assessment

K readings and VA with current specs/spec rx

Anterior eye health assessment

Anterior eye health assessment with fluorescein

Any further assessment as deemed appropriate e.g. topography, dry eye (tearoscope, schirmer, phenol red thread etc)

Advice and recall

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The only perceived barrier would be that for non-registered businesses who wish to sell CLs with their primary concern being to turn a profit as opposed to the protection of the general public. We should not be considering making the sale and supply of zero powered contact lenses easier as all this days is help irresponsible businesses and result in increased risk to the general public. The general public should not be able to acquire lenses without appropriate instruction, tuition, information on risks vs. benefits/pros and cons and thorough assessment of compatibility and fitting.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

If the regulation is lessened as the sale and supply of zero powered contact lenses is relaxed the general public will be put an increased risk. This common misconception will be that obtaining CLs without appropriate assessment and fitting means that it is safe and risk free to do so and will result in misuse. The general public have a right to be suitably cared for and informed whether being supplied powered of non-powered CLs.

Additional risks of lax standards include increased incidence of MK, acanthamoeba keratitis, CLPU, corneal abrasions and subsequent infection, other associated eye damage. As we know some of these conditions could lead to permanent and life altering effects.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Yes. Risk can only be mitigated if standards remain high and legislation exists to protect the general public from harm, as I have outlined in previous quesitons.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantage would be that the public remains better protected vs. "lessened" legislation enabling the irresponsible provision of CLs (for reasons previously outlined). However, legislation could still be more tightly controlled to reduce risk to the general public even further e.g. preventing unregistered businesses from operating online due to loopholes in the current legislation.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No I do not believe that there are any regulatory barriers that are restrictive of future development, rather that regulation could be stricter to ensure that future developments align with the standards to which registrants are currently expected to conduct themselves. We should be thinking of how to provide uncompromised care efficiently and I would suggest most of the assumed proposals of this consultation will actually compromise care in favour of profiteering.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I have answered no but I will stress, as above: We should be thinking of how to provide uncompromised care efficiently and I would suggest most of the assumed proposals of this consultation will actually compromise care in favour of profiteering.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Yes, as I have outlined in others answers the current legislation is weak and is already bypassed by the online market and "non-registrants" hence making a mockery of the system.

Legislation should in fact not only protect the currently restricted categories but should also serve to protect the most vulnerable from harm and from being taken advantage of. In addition to u16's, SI and SSI, complex rx's (and even those exceeding 4.00D due to BVD and fitting considerations) should be protected as it should not be possible for these patients to receive subpar care and appliances. In addition to complex rxs those with SLDs, those who drive commercially and all sports and safety dispenses should be protected by legislation.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

No, this is essential for protecting the individual themselves but also the wider general public. Failure to ensure an up-to-date prescription can result in substandard vision correction and if we relax these rules we put people at risk.

As we know from studies around falls, vision is an important factor, particularly in the elderly. Aside from that example, consider the taxi driver, school bus driver, paramedic, electrician, construction worker, pharmacist etc. People may not only endanger themselves and others by casually dispensing an old prescription and failing to have regular examination but could easily pose significant risk to others.

At present, registrants are in a position to make an informed decision taking in to account all manner of factors before determining the suitability of dispensing an old prescription. It is the years of training that helps a registrant come to an appropriate decision and it is their professional responsibility that makes them suited to this decision. For many optical assistants or businesses that are non-registrants the occupation is a stop gap or something to "pay the bills", whilst this is not a criticism they should not be expected (or put in the position) to make decisions that directly impact the wellbeing of an individual or group of people.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I do not perceive any advantages. The uninformed patient may perceive this to be convenient but this will stem from a lack of understanding. A well informed patient, I believe, will see the value in an up-to-date examination and prescription. In exceptional circumstances the registrant is currently in a position to make a considered and appropriate decision with the patients best interest in mind.

The disadvantages I have outlined in the former question (Q37).

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantages, as previously outlined, are improved protection of the individual and the wider general public.

I do not perceive any disadvantages as I believe it is important to act in the patients best interest and not in the interest of simple convenience.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No, it should not be possible for children (u16) to acquire sportswear that is substandard and hence it is important to regulate these dispenses. Many children opting for sports eyewear only do so because they of moderate-high ametropia as often those with low ametropia will attempt to cope with out. With moderate-high ametropia is of course more imperative that the frames and lenses are dispensed appropriately so as provide adequate vision. In addition, poorly fitted sports eyewear could lead to injury and so it only makes sense that a qualified registrant with both the capacity and enthusiasm determine suitability should dispense such an appliance. This decisions should not be bypassed in favour of unregulated online sales or put in the hands of employees who may unfortunately only choose to be in this occupation to pay the bills. Passion, care and experience are what the registrant is trained to deliver.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As alluded to above there is a risk to the health of the patient and these patients are young and vulnerable, they can't necessarily make these choices for themselves and nor can lay parents/guardians who may fall victim to cheap marketing ploys.

As registrants we are in a position to use the benefit of our education and experience to determine the most suitable choices for all of our patients and it should be with pride that take care of those most vulnerable.

It is important to consider factors such as durability, impact resistance, filters, style suitability (cycling, squash, football etc) to ensure an effective appliance is dispensed. A patient is unlikely to be aware of the appropriate standards for the sport they play (or may play multiple and use one generically for all) which will affect performance and again potentially put them at great risk. It should not fall to uneducated retailers to guide patients into these purchases and that is the risk with deregulation.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I feel my answer to this has been outlined by my previous answers on this topic. It is better for legislation to remain as it currently does to ensure high standards of care are maintained and to reduce risk to TBC

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

I do not think there are any unnecessary regulatory barriers in the sale/supply of optical appliances, to the contrary I think that the sale and supply of optical appliances is currently poorly regulated, bordering on negligent and any further deregulation would be unacceptable.

Current regulation does not have the general public's best interest in mind and should be strengthened to ensure that they receive only the best care

from suitably experienced (qualified and registered) professionals. At present, unless the patient is registered SI/SSI or is a minor (<16) dispensing is a free-for-all.

There are many more groups of patients who are vulnerable, including but not limited to:

- SLD
- Elderly (significant risk of falls from poorly fitted/inadequate optical appliances)
- Special facial characteristics
- Moderate-high ametropia $\neq >4.00D$ (BVD considerations)
- Anisometropes
- Aphakes
- Monoculars
- High risk occupations (requiring safety specs/safety eyewear)
- Commercial drivers (public transport, private hire, plant operators)

...and the list goes on.

It should not be possible for people who are at risk of harming themselves or others due to inadequate optical correction to obtain substandard optical appliances (spectacles or contact lenses) either through incompetence, neglect, dispassion, inadequate training or education of the provider. This includes through the negligence of online retailers to ensure accuracy/validity of a prescription, fitting of an appliance etc etc.

We have a duty of care and currently the regulations allow too many to make their own interpretation or bypass these in the interest of profit. We should not encourage the ethos that "profits>patient care" and so our regulations should be tighter, not relaxed.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I feel I have addressed this in my previous answer, however to confirm the advantages of regulations staying the same as at present, are simply that we still retain a level of care and ability to protect the general public. Greater advantage comes from tightening these regulations.

The advantages of tightening the regulations, as I have outlined previously, include:

- Greater protection of the general public
- Greater protection of the most vulnerable patient groups
- Increased patient education and awareness
- Less risk of profit driven abuse/neglect
- Greater trust from the general public and increased interest in their eye care

In contrast, the disadvantages of relaxing regulations are:

- General public is at increased risk of harm to themselves and/or others due to lax standards
- General public is at increased risk of being taken advantage of by rogue retailers (inexperienced, dispassionate, profit driven, using marketing ploys to mislead)
- A general slip in standards across the industry will lead to less interest of gaining employment in what is essentially a primary care sector that needs continued interest of employment to serve future generations
- A general slip in standards will also lead the general public to have a negative view of the industry and is akin to bringing the profession into disrepute.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I only have experience of working for a large multiple where recent leniency towards remote care seems to promote a casual attitude toward patient care. I foresee that any promotion of remote care, under the guise of convenience, will merely result in slipping standards as with my prior points patient care should come first and not be compromised such activity.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

You only need to look at the statistics on the vast amount of people who have missed out on essential care during the covid-19 pandemic and ultimately become very ill or lost their lives to realise that remote care is not a suitable replacement for a face-to-face consultation. Remote care is better than no care but it is not at all a substitute for thorough examination. In addition, you must consider how many people still struggle with technology be it due to age, capacity, ability etc. These groups are at an immediate disadvantage if we propose to make remote care common place. The general public deserve

more and we can provide more.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Remote care has been pushed, particularly by multiples, for CL consultations over the course of the pandemic and I feel is now being used as a way to minimise chair time in the interest of profits but not in the interest of patients. These activities should better regulated and discouraged with face-to-face consultations remaining the norm.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

At the moment it appears legislation/regulation is only applicable to registered opticians/optical businesses. Therefore, any busy operating in this sector should be regulated - it should not be possible for companies to bypass rules/regulations simply by not being registered. Ideally, all companies in the sector should be run by registrants to maintain high standards or those business that aren't should at least be regulated regardless of their registration status.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

At the moment it seems anybody who wants to turn a quick profit can start selling contact lenses and spectacles online without demonstrating appropriate knowledge, responsibility or concern for public welfare. We should not find ourselves in a position where skilled and qualified registrants are competing with unqualified businesses to provide similar products when evidently only the registrants are truly skilled and correctly motivated to do so.

Work should be done to clamp down on online sales as they create more harm than good. Online businesses should not be claiming it's ok to buy glasses online and to simply "pop along to your local optician for an adjustment", they shouldn't be selling/supplying contact lenses without any evidence of a valid specification and they shouldn't be villainising the optician as a marketing ploy.

We have all had the experience of a patient buying random contact lenses online, only to end up with terrible vision, ulcers, a lens "stuck" in their eye etc since they've had no appropriate instruction or care provided. We've also all encountered the spectacle wearer who has diplopia induced by their specs bought online with a OCs/PDs plucked out of thin air I dare say we have also all encountered the parent who has purchased specs to their child's (u16) prescription online despite the fact this supply should be regulated.

The general public should be educated and protected, not taken advantage of by misleading sales tactics by unregulated companies.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

We should be seeking further regulation of rogue businesses, as outlined in my former answers.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The primary questions that seem to be raised by the consultation are of main concern at this current time. Currently regulation is weak and already has flaws, as I have outlined in my previous answers and should not need to reiterate our regulation should protect the general public. Until we have fixed what is wrong here, further considerations should be on hold.

Primarily, everything we do should have the welfare of the general public in mind and current questions (which read more as proposals) do not seek to

do this.

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Again, I have outlined these and do not believe I need to reiterate them here but in brief we should be making regulation more robust to protect the most vulnerable - is that not our professional duty? We should seek to prevent unqualified, inexperienced or simply rogue retailers from taking advantage of the general public's naivety surrounding optical care and provision and instead promote professional care and services and educate the public in the process.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

If you fail to regulate the sale and supply of optical appliances for the most vulnerable then you put them at unnecessary risk and disadvantage. There should be an element of safeguarding in respect of the standard of services we provide.

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Student optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

I do not believe that the current form an eye test takes should be changed. I am a dispensing optician who has just finished my optometry degree and about to start pre-reg, I don't feel I had the necessary knowledge or skills to undertake refraction as a dispensing optician. I also feel that separation of sight testing elements undermines the profession and the professional qualification.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

All elements of the current eye examination.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction, eye health examination, clinical questioning, dispensing to children and low vision patients. Prescribing contact lenses.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The selling of contact lenses and spectacles online without having to undertake the same duty of care to patients.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

I am a dispensing optician who is about to start pre-reg. I did not have the necessary skills as a dispensing optician to fully understand the complexity of the refraction process and do not believe I would have been capable. Even with further training you would confuse the matter with effectively different levels of dispensing optician. It is also unfair to expect optometrists to oversee the process and put their signature to refraction if they themselves haven't completed it.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I can see no positive benefits. Optometrists would have their position undermined, some employers may take advantage of the can in regulation in the pursuit of financial gain and risk patient safety.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient safety would be maintained. The professional qualifications wouldn't be undermined.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages, that I can see and patient safety is maintained.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

No

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient safety.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Patients, being supplied incorrect or inferior products, with difficulty in returning the product or rectify the situation.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Damage to eye health, risks to patients sight. Possible driving standards not being met. The public devaluing the importance of eye examination and unknowingly risking their own eye health.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protect of eye health.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient safety

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient safety.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight testing
Contact lens fitting

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sight testing
Contact lens fitting

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

no

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Further qualifications such as Contact lens (for optometrists) or Glaucoma specialties should be registered with the GOC.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

No, although if they are a DO with a CL qualification, they should be able to refract in order to check their contact lens specifications are correct.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

DOs refracting does not impact equality, diversity and inclusion. A DO with a CL qualification should be able to refract but not carry out a sight test.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

In a hospital setting, orthoptists can refract under supervision.

A lot of refracting is done using an auto-refractor. The optometrist checks the refraction. Perhaps there needs to be legal differentiation between sight testing and refraction.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Optometrists are moving into areas traditionally covered by ophthalmologists (extended roles, independent prescribing etc), and other professions (such as orthoptists) are moving into roles previously done by optometrists. It would make sense for the legislation keeps up with current trends.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

As above Optometrists are moving into areas traditionally covered by ophthalmologists (extended roles, independent prescribing etc), and other professions (such as orthoptists) are moving into roles previously done by optometrists.

This is not data as such but can be found in numerous hospital eye departments.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Contact lens fitting can cause immeasurable harm if done badly. Regulation should continue.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages - see above. It protects the public to have regulation in place.

Disadvantages - Difficult to regulate online sales. This does not seem to stop unregistered online selling.

Impact - risk of unregistered sales leading to eye infection and other problems.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Children

Patients with learning disability

High prescriptions (e.g. > +/-8.00)

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The above groups of people are more vulnerable and care is needed to fit them with an appropriate and comfortable optical appliance.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

See previous answers about contact lenses.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Generally, patients who have been given a copy of their own prescription, are able to work out if the lenses they have are correct or not.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

They may not notice if the wrong lens prescription was substituted.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Specific follow up after contact lenses have been fitted and issued to ensure the lenses are still fitting correctly and the health of the eyes is not compromised by ongoing lens wear.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Unregistered zero powered lenses sold to the public can be poorly manufactured, delivered in unsafe solutions and fit badly leading to varying degrees of eye health issues. These issues can range from irritation to blindness.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

See above

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

See above

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It does not cause unnecessary difficulty at the moment. The risks outweigh the benefits of stopping regulation. However, there will always be those who flout the law and ways to buy illegal and unsafe products.

Just because unregistered products are available, it should not stop regulation in order to discourage most people from buying them.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

This helps to ensure reasonable quality control.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Out of date prescriptions would be made up and sight tests not carried out. The latter could lead to disease being missed.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

More chance of regular sight tests being carried out.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

As long as the generally worn optical appliances are fitted by a qualified individual, the problems of sports wear are not as great as they are not worn as much of the time and accurate measurements are generally not as important.

However, sports appliances still need to be regulated so that dangerous products are not fitted. This applies to all age groups.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See above

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not Answered

If yes, please give your reasons and provide any evidence to support these.:

The prescribing of low visual aids should have some regulation.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

- 1) Low visual aids - a lot of new technology has become available to help the visually impaired. It does not appear to be regulated.
- 2) Telephone appointments - some remote appointments could be helpful, for example a contact lens follow up or an appointment to discuss history and symptoms prior to the sight test.
- 3) Being able to discuss e.g. retinal photos with an ophthalmologist or optometric colleague. The issues around data protection need to be considered.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes - a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Increased use of technology can have both positive and negative impacts:

Positive - ability to send patients their own records, discuss pathology with colleagues, carry out remote appointments.

Negative - the scope of which parts of a sight test can be carried out need to be considered. A full sight test cannot be carried out safely without seeing the patient. Some people are not able to deal with technology.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Spitting up the sight test into its different components would need to be allowed.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

All the legislation is aimed towards the patients and consideration is not always given to the registrants. The GOC register is out of date in various aspect and does not consider the data protection of the members.

For example:

- 1) Part of the rules of registration 2005, para 21, talks about "his or its". This is very dated and should be changed.
- 2) By having the date of the registrants' most recent registration, for most, it gives users the approximate age of the registrant since most register a year after university. This date should be removed from the public view of the register.
- 3) Some of the language used in the register is difficult to understand. Clear English should be used throughout.

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

See above

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Data protection of the members.

For example:

- 1) Part of the rules of registration 2005, para 21, talks about "his or its". This is very dated and should be changed.
- 2) By having the date of the registrants' most recent registration, for most, it gives users the approximate age of the registrant since most register a year after university. This date should be removed from the public view of the register.

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight tests and unsupervised dispensing or spectacle device manufacturing. Contact lens assessment.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

As 6.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Signing off current spectacle or contact lens prescriptions.

Giving unqualified advice

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Cataract, Diabetic, Glaucoma, Low Vision, Minor eye Conditions (CUES), IP, Learning Difficulties. All should have GOC accreditation.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

All aspects of refraction especially including Binocular vision assessment needs a fuller accreditation which at present is only acquired by a qualified Optometrist.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Maintaining a level of Professional responsibility to the patient by a qualified Optometrist.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The equivalent of asking an Optometrist to perform local anaesthetic cataract surgery. Optometrists should perform full and safe sight tests. Dispensing opticians should perform all professional aspects of Dispensing safely to the public.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I believe that the fitting of contact lenses should be done by a qualified contact lens accredited optician.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Performed by accountable safe to practice registered opticians

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

To u16 and visually impaired.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Maintains the duty of care by registered accountable opticians

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Qualified professional registered Opticians

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Contact lens professional practice needs to be done by a qualified trained practitioner.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Needs to be accurate and accountable for safe practice.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unsafe practice

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Again by qualified practitioners that can be accountable and give a professional qualified service of care.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Apart from bandage contact lenses and unregulated coloured contact lenses there is no reason that a qualified practitioner should sell Plano lenses

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Yes if the Px abused or misused the product

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

The practitioner cannot be held responsible for Px error or abuse

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

To make sure that the practitioner is protected as well as the Px.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Checking for pathology and diagnosing conditions, refraction and prescription of spectacles. Fitting and supply of contact lenses. Supplying spectacles to certain categories of patients.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction and prescription of glasses

Fitting and aftercare of contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Supply of ready made glasses should be under a form of supervision.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Some further qualifications for optometrists participating in shared care schemes such as glaucoma, to offer a level of protection for those registrants.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

The supply of plano cosmetic contact lenses is rife across party shops, etc, and there appears to be very little that the GOC can do in these circumstances, which puts patients at risk.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

This could allow better service and better use of qualified staff in practice in situations such as re-checks and dispensing issues. But I do not feel that refraction should in any way be separated from the health check element of the eye examination, so there should always be a requirement for the health to be checked recently by an optometrist if any refraction is performed by another registrant.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Has potential to allow for better use of qualified professionals in store, so optometrists could perform more health screenings and checks on behalf of the hospital, while still allowing the stores to provide the refraction element.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There is a likelihood that patients can continue to wear inappropriate correction for many years, without checks for any pathology. Patients could be driving with glasses that are not suitable to meet the vision requirements, which is a safety concern. Also, patients could have conditions such as glaucoma that would remain undetected for a long time, and have financial and social implications.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A risk of children wearing inappropriate devices with either poor fit, or poor refractive correction.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

In my opinion, remote care can be useful to provide care to patients at their own convenience, so they may be more likely to attend regular appointments. However, without a full remote set up, there is very limited care that can be provided from an eyecare point of view, as a lot of care requires some physical examination, so I feel care is needed when it comes to patient selection and suitability for this service.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/a

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The Act seems powerless to deal with sale of optical appliances outside of the UK, and I feel with increasingly a global market there should be tighter regulations on suppliers outside of the UK for patient safety.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

No.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Prevented:

Fundoscopy/ophthalmoscopy, indirect/direct

Refraction

Slit lamp biomicroscopy

Emergency appointments

Prescribing prisms

Dispensing contact lenses

Contact lens aftercare

Restricted:

Performing with correct training : visual fields, OCT, Optomap, non contact tonometry, contact lens teaches

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Fundoscopy/ophthalmoscopy, indirect/direct

Refraction

Slit lamp biomicroscopy

Emergency appointments

Prescribing prisms

Dispensing contact lenses

Contact lens aftercare

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Assessing findings of:
Visual fields, OCT, Optomap

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

Shared care of
macular changes
Glaucoma/suspect glaucoma
Diabetic retina

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Visual acuity following a refraction is dependent on the health of the eye and both should be considered together during an eye examination by one practitioner- the optometrist

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Vulnerable people may have disabilities with abnormal head posture and require a professional to dispense

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Vulnerable people may have disabilities with abnormal head posture and require a professional to dispense

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Vital advice may not be passed on to the px.
Record keeping of advice may not be as precise

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A prescription may be written incorrectly
Last chance for optometrist to confirm it is correct

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Loophole allowing them to be sold in the uk without being fitted by a professional

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Not sure

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

No mention of ch as mgrs in technology

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

NA

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Business registrant/employer

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

We don't agree with the description of the objectives as non-hierarchical as this suggests that all objectives carry the same weight. the GOCs overriding statutory objective is to protect the public and this should be reflected in the GOCs approach. listing "maintaining public and patient safety" as one of the 8 non-hierarchical objectives suggests there could be a trade off between public protection and other considerations.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Testing of sight

Fitting contact lenses

Selling optical appliances to children under 16 and people registered as visually impaired

Selling all contact lenses including zero powered lenses

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The dispensing and selling of optical appliances to people with learning disabilities, dementia and domiciliary care. Enhanced skills are required to supply to these patients

The treatment of myopia management and the supply of the specialised spectacle and contact lenses. the supply and treatment can go beyond the age of 16. hence not currently protected.

The supply of optical appliances to drivers. The incorrect fitting of spectacles especially in higher prescriptions will reduce vision which could cause harm to the wearer and others on the road.

The supply of safety spectacles, The incorrect fitting of spectacles especially in higher prescriptions will reduce vision which could cause harm to the wearer and others in the work place.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Optometrists should be restricted in dispensing Children under 16, unless they have undergone specialised training to the same level as DOs . An Optometrists training is insufficient.

Optometrists should be restricted to fit only soft contact lenses.

Gas permeable (hard) contact lenses and other specialised lenses, should only be allowed to be supplied following additional training. This is because the training was removed from an optometrist training syllabus.

Contact lens opticians have this training included in post-registration qualification.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

We agree that its important to have proportionate and consistent regulation for optical businesses

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

We believe that all businesses who provide sight testing and supply optical appliances should be registered with the GOC. the public should have the same level of protection wherever they choose to be tested and purchase spectacles.

This registration should include online sellers of optical appliances

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

Optical practices have GOS / NHS contracts which they adhere to. There is ongoing practice inspection by the NHS team.

The GOC also suggesting it should inspect is a duplication.

It is important to remember that the cost burden of any additional work undertaken by the GOC will fall on registrants and hence the public/patient

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

What we have in place works

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

The sight test function should not be split into 2 parts ie refraction and eye health check. Many patients come for new specs and only perceive that they need refraction, but the sight test discovers pathology that would go undetected.

Parts of the eye test are already delegated ie field tests, fundus photography, interocular pressures, OCT and auto refraction. This saves the optometrist much time.

DOs performing refraction is no different than any of these other delegated functions.

Also having a DO performing refraction is better than an auto refractor, because the DO is able to ask pre test questions and interpret the results, having an in-depth knowledge of eye health and pathology they can interact and not prescribe but refer to the optometrist for further investigation. Auto refractors cannot do this!

However it would be helpful to be able to refract a patient when they want new spectacles ie 6 months after the last eye test, just to confirm that if the specs are made up to the latest prescription, nothing has changed in the short time period. But the NHS won't fund early sight tests unless the patient is having problems. Stand alone refraction would be helpful to patients in between regular eye tests. Only if provided by a registrant who has the skills to understand if the patient indicates any concerns or the refraction is a poor result ie a sudden reduction in vision. A DO has the skill to understand if these factors are of concern and would be able to refer to an optometrist for further investigation.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

With secondary care wanting to transfer 33% of eye patients into primary care, these patients can only be seen by an optometrist in most cases. Primary care cannot cope or survive with this high level of patients which in most cases need eye care and not eyewear

GOS and NHS services are very poorly paid

Just over £22 for a sight test as one example. A car MOT cost £54. Unfortunately optical practices need to sell Specs and contact lenses to survive.

Hence we need all the practice team to be able to support the optometrist.

With the level of training and skills that DOs have and they are registered, the DO is best placed to perform refraction and other delegated functions

Also DOs refracting would free up valuable optometrist time enabling them to see considerably more urgent eye health issues referred from secondary care or walk through our doors. This model would provide a faster service for patients which will reduce the number of avoidable sight loss

This would be a similar model to hospital eye care, where a patient goes through a process of screening, ie fields and OCT with an appropriately trained technician, an optometrist who refracts the patient and finally they see the ophthalmologist

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Enabling DOs to support optometrists in carrying out a sight test would enable patients care to be provided in a more flexible way, while upholding the principle that a sight test should involve both refraction and eye health examination.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We see no disadvantages

The big advantage is that the patient is able to see the suitably qualified ECP for each part of the eye test

The current restrictions produces waiting lists for all types of patients including those with sight threatening conditions. The delegation of refraction, frees up the optometrists time to see these urgent patients, reducing preventable sight loss

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

estimate 15% in our practices

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

We don't know that there is such data available

Would need to look outside the UK for this information

In many countries the term Optometrist is used for a person with a qualification similar to a DO

Also the term Optician is commonly used for both DOs and Optometrists

In many counties including Europe the Optometrist or Optician provides refraction only in practice and the eye health check is provided by an Ophthalmologist.

ABDO teaches refraction in several overseas countries including Malaysia where DOs have an additional qualification in refraction and provide refraction in practice.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Zero power lenses need to be fitted like all other lenses. hence the supply of zero power lenses should not only be restricted but it should state that they needed to be fitted by a CLO, Optometrist or OMP

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

i see no disadvantages leaving legislation as it is

If legislation was removed and people could buy contact lenses without fitting and regular eyecare/aftercare there is an increased risk of eye conditions and preventable sight loss. Along with self selection of the contact lens power, which could increase harm to the wearer and others especially in the work place and driving.

Online retailers should be ensuring all who order from them are receiving regular aftercare and routine eye tests along with providing a route for this service

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

The dispensing and selling of optical appliances to people with learning disabilities, dementia and domiciliary care. Enhanced skills are required to supply to these patients

The treatment of myopia management and the supply of the specialised spectacle and contact lenses. the supply and treatment can go beyond the age of 16. hence not currently protected (Contact lenses are protected)

The supply of optical appliances to drivers. The incorrect fitting of spectacles especially in higher prescriptions will reduce vision which could cause harm to the wearer and others on the road.

The supply of safety spectacles, The incorrect fitting of spectacles especially in higher prescriptions will reduce vision which could cause harm to the wearer and others in the work place.

Sports eyewear, including swimming goggles, sports goggles and diving masks, the visual performance of these appliances is greatly compromised if the prescription is not modified to take into account that many of these appliance fit in a different position to spectacles or the prescribers trial frame. Sports wear is often used for a variety of very dangerous sports and the consequences of poor vision could be life threatening

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protecting people with learning disabilities, dementia and those needing domiciliary care.

Protecting young adults

Preventing injury and saving lives of drivers and those needing safety spectacles and the public who are affected by those who wear inappropriate and poorly fitting optical appliances

Preventing injury and saving lives of patient engaged in sport, along with improving their performance,
Its not public protection but the UK could win more sporting events if our sports people had well corrected vision!

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

The current Legislation is required to protect the public

BUT it should be acceptable for a patient to provide an electronic copy of their in date contact lens specification without the need for this to be verified, provided this can be read clearly and written in a format recognised in the UK.

However we don't agree with the GOCs view that the requirement to verify the particulars of a specification should be removed as this would potentially enable contact lenses to be sold without the patient having an in date specification and therefore without receiving appropriate aftercare

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

without current restrictions, eye health and vision would be at risk
while overseas there is no protection, this is only a small number of patients.
millions more would be put at risk

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Its a function registrants have always performed. It is not an issue to retain

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Removal would be harmful to eye health and vision.
Increases risk of the wrong prescription, fit and material being supplied

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

It should be left to the professional judgment of the eye care professional and registrant. to decide what aftercare is appropriate for each individual patient.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The current legislation is necessary to protect the public

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Removing the legislation would increase the risk of eye health problem along with undetected visual impairment. putting a zero powered contact lens onto the surface of the eye can have an optical effect and reduce vision.

The incorrect fitting lens and wrong material can result in damage to the eye health including blindness.

Without the correct instruction in insertion, removal and care of contact lenses can result in eye health issues including blindness.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Putting a zero powered contact lens onto the surface of the eye can have an optical effect and reduce vision.

The incorrect fitting lens and wrong material can result in damage to the eye health including blindness.

Without the correct instruction in insertion, removal and care of contact lenses can result in eye health issues including blindness.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage, public protection, good eye health and vision

Disadvantage, no public protection, poor vision, potential blindness

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Patients already have have massive choice where they can purchase optical appliances.

Further relaxing of regulation can only lead to less public protection

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Less public protection. poor vision

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

inappropriate optical appliances causes poor vision, in the case of children this can cause impaired vision for life!

Poor vision causes harm to the wearer and other

Registered ECPs understand when something is wrong when providing optical appliances that requires further investigation

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Much can change in eye health and vision in 2 years
regular eye tests are essential to maintain good vision healthy eyes

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage, poor public protection, poor vision and harm to wearer and others, poor eye health, blindness
Advantages None

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage, good eye health and vision
Disadvantage none

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

inappropriately fitted sports eye wear can cause poor vision and can harm eye development causing reduced vision for life.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage none
Disadvantage, poor vision and harm to eye health development causing reduced vision for life

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage, good vision, good eye health development, well fitting appliances, better performance in sport
Disadvantage, None

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

protection of the vulnerable patients needs to be included

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage Public protection, good vision and eye health
Disadvantage, No protection of Vulnerable patient

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

none

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

technology can be used to enhance and increase efficiency of patient care.

BUT it is essential that the technology is used appropriately by only registered dispensing opticians and optometrists or optical businesses. To ensure public health standards are maintained.

If diagnoses is made outside the UK this should be done only by a UK qualified and regulated eye care professional

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Future concerns are online refraction.

current regulations need to be in place with further appropriate restrictions to maintain public protection

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Don't Know

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

no

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

It is impossible to supply spectacles on line that are accurately made and fit for purpose.

You need a face to measure and a face to fit the spectacles to.

Its the same as trying to obtain a made for measure item of clothing without having the body to fit to.

Concerningly improper measured spectacles an incorrectly fitting spectacles produce uncomfortable vision and reduced vision.

These factors could be harmful to the patient and others. I.E vision falling below driving standards

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Ensure the on line seller uses an registered ECP to measure and fit spectacles at a registered practice. and provides realistic fees for the service

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

The GOC is underestimating the knowledge of optometrists and how that knowledge is used in a seemingly unimportant part of an eye exam

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Eye exam - of all classes of patient

Refraction

Contact lens fitting

Contact lens review

Monitoring of eye conditions

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye exam - of all classes of patient

Refraction

Contact lens fitting

Contact lens review

Monitoring of eye conditions

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Some places may employ registered opticians but do not have appropriate equipment for adequate sight testing or state that an optometrist oversees various functions when in fact there is no such person on the premises

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

A change in refraction could indicate pathology - if a DO is refracting alone in a practice then there is a reasonable danger that the px is not referred properly or seen by an optometrist in a timely manner. Also pxs may go years and years having a refraction only and no full eye examination and pathology could be missed - pxs don't understand what optometrists do at the best of times - this just adds another complicated layer we can do without - only financially motivated

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

If DOs can refraction practices will want only to employ income generating DOs with a token optometrist who will be paid badly and be poorly motivated Services to pxs will be downgraded rather than improved

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Pxs get a full eye examination which encompasses all they need for good eye care.

There are no disadvantages

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

My role as an optometrist is to preserve sight - current regulations enable this

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Pxs eye health should be protected

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Risk of harm if pxs are supplied with incorrect lenses

Risk of harm if pxs not given the correct information on safe wear and care

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Risk of harm if incorrect lenses given

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Px eye health needs to be protected

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There is a real danger of people doing tasks that they are not properly corrected to do
Eg driving, using computer (where input errors have serious consequences)

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Maintaining health & safety of the population at large

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

I am not aware that the goc does any inspections on companies that claim an optometrist oversees online contact lens sales or whether online spectacle sales are actually dispensed to children

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Inspection by the goc in person- online companies should have a licence to allow them to operate specifically as online which they have to pay for

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction

Medical diagnosis

Treatment

Selling optical products such as contact lenses or spectacles to prescription both online and in premises

7 What activities do you think must be restricted to our registrants?

Please provide details.:

As above

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Strict control of online supplies

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Financial

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Prescribing behaviour both in terms of clinicians and practice. E.g over prescribing of optical appliances and pressure on optometrists to prescribe where not clinically necessary.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Optometrists could extend their roles in managing disease

Could be financial loss to optometrists - particularly independent practices.

Public would need to be required to have a medical eye exam by an optometrist as part of a 2 tier system every 1-2 yrs. Refraction would be separated but would require an optometrist's 'supervision'.

Risk of abuse where corporates would pressure refractionists to over prescribe.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protects public from retail opticians over prescribing

Protects public health as public understanding of a sight test is inclusive of a health check. Separating will lead to rise in missed medical eye appointments.

Disadvantage is that a sight test is too broad a definition. It is restrictive professionally in extending roles of specialist services in the community.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Would have to extract this from our database but in our practices it is likely significant as we are a community practice.

Some has reduced due to MECS and IP

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I would advise looking at other countries where refraction is delegated but under the supervision of an optometrist. Eg USA where opticians can refract under optometric supervision.

Refraction should be within the supervision of an optometrist, however optometrists should be able to delegate to a dispensing optician.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Contact lenses is a broad term. Speciality lenses for Keratoconus, dry eye and post operative Ely require a different skill set. These should only be specific to optometrists.

Regular soft contact lenses require a lower skill set but require professional assessment for suitability and compliance. There is research that shows non supervised care results in higher microbial keratitis.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

those with VA below 6/6

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and

equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If sale and supply is not restricted there is a health risk of not investigating vision loss.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Rarely is this rule implemented or even enforced.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Assessment of vision

Assessment of anterior ocular health

Assessment of fit of lens

Communicating options

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

No contact lenses should be supplied without registration

They are a health risk if not supervised. It is ridiculous that a non prescription product is not regulated. The prescription is irrelevant.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Zero powered lenses must be regulated

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

They cause infections, encourage poor compliance

Imports from unregulated suppliers.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Infection

More hospital admissions

Permanent Vision loss

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Reduction in eye exams

Delayed diagnosis of asymptomatic conditions eg glaucoma, cataract

Financial loss to practices

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Poor compliance

Proper fitting and measurement could affect muscle balance

Increase in myopia is a global problem, interaction with an eye care professional for advice is important

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Continued protection of the public

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

NHSX referral system

Cloud based image applications - various providers

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Main issue enforcement. The GOC must enforce illegal suppliers particularly off shore

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Requires a longer discussion

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Student optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

The dispensing optician should carry out a refraction.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

All optical skills.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The optometrists should do what they have always been doing, such as the refraction.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

no

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Dispensing opticians should not refract.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

h

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

g

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

g

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

g

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

g

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

f

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

f

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

g

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

g

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

f

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

g

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

f

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above
and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The GOC I'm sure is aware of the ^[redacted] business model which uses remote overseas 'opticians' to perform a sight test. Despite the fact that a UK optometrist 'verifies' an already purchased prescription, without doubt the initial 'sight test' gives the patient the impression that they have had an eye examination. Clearly this is not to a GOC/ college of optometrists standard and likely discourages such patients from seeking a full eye health check as they wrongly assume they have had an 'eye test'

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

There needs to be clear clarification as to what can be done remotely

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

With changes to the NHS contract in Wales imminent, there is an agenda to push the scope of practice of Optometrists in Wales. Is the GOC set up for such national variations eg fitness to practice procedures?

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

With changes to the NHS contract in Wales imminent, there is an agenda to push the scope of practice of Optometrists in Wales. Is the GOC set up for such national variations eg fitness to practice procedures?

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Selling specs to the below groups

Safety specs

Complex prescription

U 16

Sight impaired and several sight impaired

Selling contact lenses

Fitting all contact lenses includes zero powered lenses

Performing eye examinations

Provide eye care advise such as triage without supervision

7 What activities do you think must be restricted to our registrants?

Please provide details.:

All the above

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Safety specs
Complex prescription over + or - 5D in any meridian

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Online suppliers regardless of base location if supply to UK should be forced to obey UK law

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

But DO would need to have done the refraction top up qualification any only if ophthalmology has been performed in the last 2 years

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Free up time for optometrist to perform EOS services
Reduce the risk of non tolerance to prescription
Allow more frequently vision checks without the need for a full eye examination

Allow the public to see the relation of spectacle prescription to the ocular appliance

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

With more eye care coming to the local optometrist this could lead to longer waiting times for patients to be seen and potential sight threatening conditions like glaucoma not being detected due to wait times for a current eye exam and refraction test
Having DO being able to do refraction will allow more clinical time to be free

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None as it currently works the need for an in-date eye exam and have lenses fitted by a qualified practitioner work and keep the patients safe

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Safety specs - need to have understand of importance of lens materials etc
Complex prescription this needs to go back to relay later dispensing as these patients can have reduced vision and poorly fitting frames and optical centres can reduce the vision further

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages would be to provide better eye care to those groups
Disadvantage the patient would need to be seen in an optical practice not purchase online

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Corneal abrasion corneal ulcers would be seen more due to poor handling and teaching methods
The arterial eye health would not be as valued as it is currently

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Online suppliers currently don't ask for verification and swap branded lenses at will saying their lens is the same as xx lens
This has potential visual issues and ocular health implications

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

An maximum time of 12 months between appointments with a qualified practitioner to assess the vision, fit and condition of the contact lens and anterior eye health

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

More people will be attending practices and HES with lenses stuck in eyes no guarantee of materials standards to be used

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Action can be taken against those whom break the law

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Spectacles need to be manufactured and verified to a prescription dispensed and checked by a qualified person

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

How would you feel if your child was killed by a driver whom punched specs from a refraction over two years old

This is why only qualified professional DO or OO, CLO should be able to author this and under exception with justifiable reasons such as patient has been in HES lost specs unable to come for eye examination due to being bedbound needs specs for watching tv and reading while recovering

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Children eyes are developing still so must be seen by qualified only

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

How can you check ocular health on a video call simple answer you can't

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/a

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

All suppliers must have a signed copy of the specifications and only supply when they have this also not be able to subtitle contact lenses for a different brand.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

More requirements to get all not just uk based supplier if they sell to the uk they must abide by the uk law and conviction to those that don't. Run random checks for compliance. Make all online suppliers register with the GOC as well

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction. As this is definitely going to be exploited by the franchises and multiples who only care about cheap labour, sales targets and converting sight tests to selling glasses in order to increase their dividends. Also the splitting of the refraction from the eye health check leaves the public unchecked/vulnerable to undiagnosed eye conditions.

At present having this tied together is in the public's best interest.

Eye health checks.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction and advice on glasses prescriptions and contact lenses and on any change in prescription. This is open to exploitation by businesses and one wonders if that's where this whole consultation has grown from.

Eye health checks, diagnoses and monitoring.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Yes all as currently. There is no reason to take these activities away from registrants.

The only reason this is being pushed and suggested is so cheaper labour, easier to manipulate labour can be used to sell glasses and exploit the public.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

100% if the GOC truly cares about the public.

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

The only call for change and deregulation is from big business to increase profits. This and the apprenticeship.

Deregulation, cheap labour, exploit public, increase profits.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Absolutely not. This would be exploited and not adhered to. The sight examination is also used to detect changes in health of the eye.

As an Optometrist the nuances of refraction, history, and eye health past and future go together.

This would not be in the public's interest.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality,

diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Dispensing opticians are not trained to refract or to tie this in with eye health.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The public remain protected by having the sight test by a competently qualified and registered optometrist who is able to tie this in with eye health.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

Is this a sick joke?

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Examination difficult. Many patients have to be seen anyway

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

I feel this is completely the wrong direction for the profession

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Optometrist should be the only ones to refract also the online market place is killing Optical practices. The GOC should be looking to regulate online.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Prescribing and dispensing glasses.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Selling glasses online, patients are not coming in for checks as they get the glasses online. This leads to conditions being missed.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The only advantage would be to businesses who would get rid of optometrists as it will be cheaper to have DOs

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It protects the public however I feel the GOC are not protecting the profession.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Via [redacted] clinical outcome report

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

By keeping it to professionals it allows a safety for patients although this is a barrier it helps prevent issues for patients.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It will vulnerable groups to be treated properly

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It helps make sure patients get the right lenses.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Making it illegal to stop unqualified organisations performing this.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The regulations are not fit for purpose.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

People can buy online without a test

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Good for businesses bad for patients as they won't get a health check

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Makes sure patients get health check however patients will more likely buy online rather than get test.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Regulate the online market place

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Online market place

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Eye examinations which include eye health and refraction.
Supplying optical appliances to under 16.
Supplying and fitting of contact lenses.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Optometrist:- eye health examination , refraction, fit and supply both spectacles and contact lenses.
Contact lens dispensing option:- fit and supply contact lenses and spectacles.
Dispensing Optician :- fit and supply spectacles

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:

Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

The refraction is part and parcel of the whole eye examination and is taken into account once the health has been established. It is bad enough that many Optometrists don't routinely perform Retinoscopy on children and rely upon the Auto refractor and tend to under plus or over minus. I have recorded many instances in my diaries over the past few years.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

See question 15

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

See question 15

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantage is that there is one person held accountable for health and refraction and that is the Optometrist.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As with Optometrists, a qualified contact lens fitter has been examined on both the health aspect and the correct fitting and supply of lenses.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Health aspect , you are placing an alien object onto the cornea of someone's eyes.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

A health examination of the eye on a regular basis

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Eye conditions

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Technology yes but remote care a definite no, just ask your patients who needed to be seen by a GP during COVID and could only get a phone consultation with a guess to diagnosis.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Answers to question 8 below

7 What activities do you think must be restricted to our registrants?

Please provide details.:

See answers to q8 below

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Sight testing should remain the responsibility of the Optometrist. Allowing dispensers to refract will lead to inconsistent care with ultimately poor patient outcomes and satisfaction.

The nature of certain ocular diseases affecting refraction (cataracts,diabetes, AMD, etc) mean the optometrist is best placed to detect , refer and monitor this whilst undertaking refraction themselves- delegating this would lead to inaccuracies, undetected pathology and ultimately complaints.

The testing of refraction requires intense training which spans different aspects - ocular systemic disease, binocular vision status, etc, which require optometry training.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantages are not many at all, if any.

Disadvantages are many, some listed in answer 15. Clinical care should remain the responsibility of the qualified Optometrist, not the DO. A result of amending refraction is the inconsistent care provided to patients, ultimately leading to time delays, inaccuracies and complaints. Refraction is part of the sight test and should remain so.

Timewastage is another disadvantage whereby optometrists will be checking and rechecking the refraction errors of the DO. This will be an added financial burden on the practice and patient.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantages of the current sight test legislation outweigh its disadvantages.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

When speaking with colleagues we agree that to separate the refraction of the sight test would be problematic for us as practitioners but also the patient. It is best to leave the two aspects together in the sight test for the qualified optometrist to undertake.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Fitting of contact lenses requires a deeper knowledge of refraction especially in presbyopes and myopia changing children. Thus the optometrist is well placed to do this since they have a better knowledge and training regarding the pathological aspects of this. Hence the advantages of leaving the legislation as it is overrides the disadvantages.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No, it is in the patients best interests to keep this under current legislation.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Patients would not be seen in a timely manner, especially if having pathology which was being monitored by an optometrist, especially an independent optometrist. Perhaps the IP optometrist was monitoring an eye condition they were treating. Also if the optometrist was undertaking myopia control using contact lenses then this would be compromised if this legislation was changed especially since the optometrist would be responsible for the overarching management of this refractive treatment.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Removing this legislation would downgrade the professional standards of the profession. This would lead to haphazard prescribing and ultimately risk to patient safety.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

There should be greater consistency in defining an aftercare, especially the time intervals of these checks.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Zero powered legislation should be the same as prescription contact lenses.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Inconsistencies, errors and ocular health risks since patients would go beyond the two Yr gap thereby delaying detection, referral and treatment of pathology,

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This should remain under a registered optometrist or dispensing optician.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Coloured and coloured contact lenses.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction, CI work. Dispensing restricted groups

7 What activities do you think must be restricted to our registrants?

Please provide details.:

CI fitting. Fundoscopy, interpretation of Oct fields etc

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes - under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Risk of inadequate supervision. Pressure from corporate sector to allow as cheaper staff

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction, clinical examination of eyes, dispensing of spectacles without supervision by a qualified and registered practitioner, fitting and supply of contact lenses.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction, clinical examination of eyes, dispensing of spectacles, fitting and supply of contact lenses.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

not sure

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction, alongside the clinical examination of the eye to check for signs of disease must remain connected as there are aspects of both which are vital to fully informing the outcome of the "sight test".

Patients are frequently unaware of clinical issues or pathology - a refraction only sight test would miss these cases leading to damage, blame, legal cases etc.

Optometrists are trained and qualified to consider all the information as a whole and take responsibility for the decision made.

Separating the 2 elements would lead to failings, misdiagnosis and missed opportunities to detect signs of disease.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantages - None

Disadvantages -

Separating refraction from clinical examination would lead to failings, misdiagnosis and missed opportunities to detect signs of disease.

Misdiagnosis could lead to damage, negligence claims etc.

The current GOS funding, whilst inadequate for the current sight test would be rendered inappropriate for a split / delegated eye examination

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is well regulated at present, protecting the patient and ensuring a high quality of eye care is delivered

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

data exists: ie: the number of GOS sight tests performed is available from PCSE and the number of optometrist referrals is available from individual NHS trusts.

Unavailable data will be the number of private sight tests performed and the number of referrals made to private medical practitioners outside of the NHS.

My personal view is that between 5 and 10% of my clientele require referral via various routes and that I spend upto 20% of my working day dealing with referrals and associated correspondence.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Fitting of contact lenses must remain the sole domain of qualified and registered Opticians / practitioners.

Significant harm can occur to individuals if contact lens fitting and supply is not regulated and supervised.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

sale and supply of Rx contact lenses should remain a regulated and controlled activity

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Contact lens supply should be regulated to ensure suitability, compliance and supply of authentic and quality products. Unregulated supply allows problems to go unnoticed and diminishes the importance of eye health care in the public.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Legislative requirements ??

Most online contact lens suppliers completely ignore the need for verification of contact lens specifications when supplying direct to the public.

There are countless times in my practice where patients have received on-line contact supply with no information whatsoever from a qualified contact lens practitioner

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This requirement is completely flouted by many on-line suppliers of contact lenses. The regulation needs to be enforced - lack of compliance should result in suspending that organisations ability to supply.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Aftercare should entail the annual verification by a Qualified and registered Optical professional of the fit and suitability of the lens in situ, an assessment of the health of the front of the eye in relation to the wearing of contact lenses and a signed, dated copy of the specifications which effectively authorises the user to continue in this way for a maximum of 12 months.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

There is a mass of information about types and suitability of optical appliances which can cause harm if inappropriately supplied. Qualified suppliers are trained, regulated and conduct CPD to ensure that correct and appropriate advice is given and responsibility taken where mistakes are made.

This is entirely in the best interest of the public

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Patients do not always realise when their eyes are not functioning correctly. Any regulation to encourage a regular refraction / eye health check should be encouraged and removal of this restriction would lead to harm in some cases.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unregulated suppliers do not take any clinical responsibility for their customers and would welcome the removal of the 2 year restriction for commercial gain. Non-enforcement of a 2 year prescription would lead to harm in some cases.

Registered eyecare practitioners take responsibility for their actions and do care for their patients. The 2 year restriction helps to ensure appropriate, safe, continuity of care.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

it should be appropriately regulated

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Potential for eye injury, damage, harm.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Ensuring that contact lens suppliers comply with the regulation to see evidence of a contact lens aftercare would be a good start.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

There needs to be more insight into the poor and variable quality of optometrists in England. There needs to be a more standardised practice (like Scotland) as English optometry delivery is so variable from CCG to CCG.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

The should NOT be

Providing contact lenses

Providing any type of optical appliance

Providing any type of eye care/sight testing

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Any kind of action involving the eye, correction of sight or eye health assessment

Contact lens and spectacle dispensing should be limited to those with a qualification and registration.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Vision screening for drivers.

All drivers should have to have a sight test to learn to drive and at regular intervals to maintain their driving license

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

Businesses play fast and loose with the regulations knowing that they can get away with things!

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Having done practice visits during my job and spoken to other optometrists it's concerning how non optical manager and regional teams dictate on professional matters they have no understanding of.

An opticians is no different to a shop that sells handbags ...I was informed by one regional manager at [redacted] I left soon after!

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It's impossible to know if your refraction end point is complete without understanding eye health.

Patients would consider that their glasses are ok as a sign of good eye health meaning eye diseases were more progressed when diagnosed and then cause a massive cost implication to the NHS when these advanced problems need sorting

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

OMP shouldn't be allowed unless they show training. They're generally hopeless
There should be more needs led examination and less sight testing similar to the Scottish primary and supplementary examinations

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Ensure a full service for the patient /
So that all their eye health requirements are dealt with in one appointment.
There should be tiered and different types of appointment so that a needs led assessment is encouraged

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I work in a triage clinic where we see any routine referral coming from primary care instead of them going to HEs.
We generally discharge 75% of those referrals as they don't need secondary care they just need a competent optom with enough time to fully investigate the issue rather than referring because they don't want to get sued

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It needs to be stricter regarded supply

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Everyone

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients need to ensure they can see if their prescription to ensure they don't cause harm to others

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A patients son was provided with -6DS swimming goggle instead of +6DS when purchased on [redacted] ...the child is 6 and there was nothing about patient age or how the order would be verified

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See above

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Getting a patient to measure their own PD prior to buying glasses on line? Need I say more!

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

As an organisation in place to protect the public's best interest, there should be no consideration of allowing separation of refraction from eye health assessment, the two are inseparable.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Eye health assessment, refraction, contact lens prescribing/recommending, and spectacle prescribing. These should be performed by optometrists only.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye health assessment, refraction, contact lens prescribing/recommending, and spectacle prescribing should be carried out by optometrists only. Dispensing of contact lenses should be restricted to GOC registered practices, not online retailers based outside the UK who have openly provided contact lenses to UK residents without prescription.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Patients with higher or more complicated prescriptions (ie high prescription, anisometropia, high astigmatism, those with reduced vision but not classified as low vision) would benefit by seeing a qualified dispensing optician. The lay member of the public is not aware there are separate qualifications for dispensing, nor are they made aware if the individual dispensing their spectacles is a qualified dispensing optician. From having worked in both independents and multiples, I have unfortunately come across many optical assistants who lack the necessary skills, understanding, and of course training, to appropriately dispense individuals with even slightly complicated prescriptions. It is not in the public's best interest to continue in this manner, it results in many rechecks and remakes of spectacles both wasting their time and causing them to lose confidence in the competence of individuals who work within the optical sector.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

Could not find details on this on the GOC website

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Likely there will be large impacts to any changes to regulation, unfortunately this information is not easily found on the GOC website.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

The GOC could more effectively regulate by monitoring how many registered members of staff are within an optical practice vs unqualified, and investigating the practices where the majority of work is carried out by unregistered individuals. The GOC could also regulate by addressing online sales of spectacles and contact lenses.

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

The optical sector needs the current Opticians Act to be enforced first. Currently there are online contact lens sales without valid contact lens prescriptions, online spectacle sales for individuals under 16. If anything there needs to be more strict regulations, this would be in the best interest of the public's health and safety.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Absolutely not. Refraction and eye health assessment are inseparable. A hyperopic shift may indicate oedema within the eye, a sudden change could indicate diabetic change, variable vision could indicate anterior eye conditions, distorted vision could indicate macular degeneration, being able to achieve good visual acuity but complaints of poor quality of vision could indicate cataracts or fuchs dystrophy, the list goes on! Optometrists gain so much valuable information from listening to patient's during refraction, information that is not necessarily disclosed during even a thorough case history.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Please see negative impacts listed in response to question 15.

There should be no consideration of financial gain for business owners in this discussion, it is not in the public's best interest. The GOC should prioritise patient care over the bottom line of their registrants.

Financial impacts for patients should not be a consideration in this discussion as the NHS offers vouchers for sight tests and vouchers for those in need of financial support.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Refraction and eye health assessment are inseparable, see reasons listed in response to question 15.

The only advantage to this would be for corporations profit. The disadvantages are immense and against patient's best interest.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients would continue to receive adequate care, as they expect when they enter an optical practice.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

This would be largely variable but can be obtained through electronic systems for record keeping. Having worked in both independents and multiples, I would suggest looking into the percentage of patients referred separately between these two types of practices. I imagine you will see a difference as optometrists in larger corporations are not given adequate time to perform a thorough eye health assessment, which likely results in more referrals, putting unnecessary strain on the NHS.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It needs to be regulated as it is, currently the Opticians Act does not stop online sales to those without valid contact lens prescriptions.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protects patients eye health, which should always be the main priority. Current legislation needs to be enforced, it currently is not.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Patients with higher or more complicated prescriptions (ie high prescription, anisometropia, high astigmatism, those with reduced vision but not classified as low vision) would benefit by seeing a qualified dispensing optician.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The lay member of the public is not aware there are separate qualifications for dispensing, nor are they made aware if the individual dispensing their spectacles is a qualified dispensing optician. From having worked in both independents and multiples, I have unfortunately come across many optical assistants who lack the necessary skills, understanding, and of course training, to appropriately dispense individuals with even slightly complicated prescriptions. It is not in the public's best interest to continue in this manner, it results in many rechecks and remakes (a financial impact) of spectacles both wasting their time and causing them to lose confidence in the competence of individuals who work within the optical sector.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

These are necessary barriers which are not currently enforced, and ultimately patients are the ones to suffer from this.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Absolutely, we currently see issues in practice from the current legislation not being enforced.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

This is necessary for patient safety. Please find ways to enforce current legislation.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients will use a medical device not prescribed for them, we already see issues arising from this within practice as current legislation is not enforced.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

An aftercare includes a physical assessment of anterior eye health, which cannot be performed via telephone or video call. This is not a virtual assessment. An aftercare includes a visual assessment and over refraction. An aftercare includes review of patients contact lens care habits to prevent future complications.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It is necessary for patient safety and current legislation needs to be enforced.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Absolutely, many zero powered contact lenses sold to UK residents are without prescription and are not suitable for use (do not have adequate oxygen permeability, are not safe materials to wear). The current legislation surrounding this needs to be enforced.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Yes, please find ways to enforce this, it is in patient's best interest.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

An advantage would be patient safety, please enforce current legislation.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No, if anything there should be more strict legislation surrounding this. Patients do not make an informed decision about whether they are dispensed by a qualified individual or not.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

If dispensing opticians were not required for dispensing, errors could easily be made. Incorrect centration induces prismatic effects. Anisometropia, high astigmatism, and other complicated prescriptions require more fitting measurements which unqualified individuals are either unaware of, or not trained to measure. There should be more strict legislation surrounding this as it is possible for even under 16s and those with low vision to purchase optical appliances online.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Absolutely. Consumers are not given the option to make an informed decision as to who they are dispensed by in practice, qualified dispensing optician or not. Optical assistant often lack training to know which measurements are necessary for complicated prescriptions. Even worse, when purchasing spectacles online, these measurements are completely omitted. If these measurements were not important, the GOC would not have any required competencies for dispensing opticians to complete before becoming registered.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

A lot can change with prescription and eye health each year.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unless there is an emergency (a patient's only pair of spectacles breaking and us producing a replica pair) there should be no other exceptions. A lot can change with prescription and eye health in two years, some health changes being asymptomatic.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients continue to receive adequate eye care.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Children's eyes are still developing, it is essential they are dispensed by a GOC qualified professional.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Prism could be induced if lenses are not centred correctly, causing muscle imbalance. There could be errors calculating best vision sphere, reducing visual acuity, potentially contributing to myopic shift or amblyopia. Children's eyes are still developing, it is essential they receive adequate care.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is essential children receive adequate care from a GOC qualified professional, their eyes are still developing.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

There needs to be specification on how the existing legislation is to be enforced, it currently is not. Suppliers can ship spectacles and contact lenses (without prescriptions) to the UK from elsewhere without customs stopping this, despite it not being allowed under existing legislation. Large companies within the UK are not held to GOC standards, the GOC currently appears to be biased and not serving to protect the public's best interests.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient's best interests is prioritised over large company's profits.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Modern tools can aid in taking measurements in dispensing, but they should never be solely relied on. Traditional measurements give more reliable and often more accurate results, and it is important for individuals dispensing to understand how to take all required measurements for complicated prescriptions and the purpose of taking these measurements. Similar to how optometrists should never solely rely on analytics produced by diagnostic tools (ie OCT scans), these tools should only exist to compliment a traditional, thorough, eye health assessment.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Remote care is essential for some individuals, but not equivalent to the eye care received in practice.

Unfortunately even in practice the increased reliance on automated machines means some practitioners are skipping over more reliable, accurate methods of assessing eye health and less accurate measurements for spectacle dispensing.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Technology can be hugely beneficial to practicing optometry and for dispensing, great to use in addition to traditional methods. However, automated equipment cannot replace current methods entirely. They are complimentary techniques, not interchangeable.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

It needs to be clarified that autorefractors cannot be the sole information used to produce a prescription, that fundus photography alone is not sufficient as an eye health examination, that digital measurements for lens centration must be confirmed by a dispenser with traditional methods (ie city rule, head calliper, etc).

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Stronger wording in the Opticians Act that specifically addresses modern advances, see the response above to question 48.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The legislation does not serve to protect the public if it is not enforced. It needs to be specified how the current legislation will be enforced (ie UK customs refusing imports of spectacles and contact lenses without enclosed valid prescriptions).

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

UK customs refusing imports of spectacles and contact lenses without enclosed valid prescriptions. The GOC monitoring how many GOC qualified members are in optical practices.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Our regulatory body need to be unbiased. Larger companies with higher profits are influencing the GOC to make exceptions to the standards all qualified dispensing opticians and optometrists had to put in years of study and training to prove competent of. This questionnaire highlights this, many of my responses today are explaining the core competencies the GOC required me to learn when undergoing my pre-registration year. The GOC could remove all legislation surrounding eye care and supply of optical devices, but this would not be in the public's best interest. The GOC's purpose is to protect the public and at the moment it seems GOC registrants are having to plea for the GOC to do so.

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Current legislation needs to be enforced, GOC policies need to be developed to find ways to effectively enforce current legislation.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight tests

Contact lenses

Giving unsolicited advice to patients

The patient will not know which member of staff does what. Information that may be important that has been relayed to one individual might not get to the optometrist who will ultimately be responsible in fitness to practice cases

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Full sight test except auto refracor and taking fundus photos

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

History and symptoms.

Retail staff giving unsolicited advice to patients without consulting optometrist

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

The GOC is easily bribed by greedy unscrupulous directors. Cheap wages. High volume output. Money in the back pocket. Tick box campaigns.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Need to evaluate refraction alongside history and symptoms and eye health. This cannot be performed separately.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Refraction and eye health cannot be separated. Px follow up and imparting Patient with accurate advice and follow up will not be achieved when the sight test is split. The patient is at risk.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Splitting the sight test and relying on another's accuracy and responsibility that if the patient were to come to harm would ultimately fall on the optometrists shoulders. Litigation/ accuracy/ responsibility/ lazy eyes/ what is normal for patient. Refraction is not a stand alone procedure. Also cover test/ motility/ pupils. Where does this end. This is the GOC trying to devalue the importance of a full sight test as it is being pressurised by large multiples. Profits before patients.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As the present sight test exists . Patients have all their eye health and checks catered for and it is a patient centred experience. Let's keep it that way. The GOC has been influenced and bribed too much by greedy directors who have no respect for anything except monetary gain and devaluing the profession.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

I'm a locum. I cannot divulge that information. But I know a dispensing optician would be unable to do this and I would probably have to retest patients in order to give a full accurate diagnosis.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

The [redacted] and most optometrists are not happy with the GOC. Patients will suffer and standards will fall. If the [redacted] and the GOC continues with these ridiculous proposals there is no future in optometry. Is this what we pay our fees for. Patient sight loss will increase. It will not be a patient centred experience

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Patients guess their prescriptions. Never bother having a contact lens check.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient health. No aftercare. .public using cheap non recommended brands. Arriving in practice with emergency corneal ulcers. Patients self diagnosing and self medicating in internet for contact lens problems. No respect for optometrists the more the industry has been deregulated

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Children and low vision patients. Public dont value your service and dont want to pay for your expertise. This culture has come from optical bodies that have not supported this profession.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is not in these vulnerable patients best interests. Many of them are unable to speak for themselves and may accept substandard appliances. Also many people do not know how to interpret a spectacle prescription.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

They've already gone too far

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

It's already happened. You did nothing to stop it.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Patients do their own thing anyway

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients make it up anyway

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

A proper contact lens fit and prescription check.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Patients do their own thing. Price is the public's greatest issue. No one wants to pay for a service.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Many patients turning up with corneal ulcers. Many share lenses and have no idea of basic hygiene. Often they try to teach themselves how to insert and remove contact lenses. I've heard some horror stories like removing contacts with a cotton wool bud.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

As above. Patient thinks they know more about your job than you do.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As above.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Too late.

Where was the support from our optical bodies to have put a stop to this years ago

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The customer always blames the optometrist even if they have ordered something wrong. Sometimes the abuse patients give you is shocking. No respect. Service has been devalued. And looks like the GOC wishes to continue in this mode. Can you really say that this is beneficial for the profession.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Everyone should have a sight test every 2 years . Prevention is better than cure. We dont think twice about seeing a dentist every 6 mths. Why skip on eyecare when it is our most precious sense

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Eye health. Sight loss that may have been preventable. Prescription will have probably changed. How many people come in for sight tests saying they have great eyesight and can only see the top letter on a chart

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unnessary sight loss. Cheap online specs cannot bring back unchecked eye problems. The public expect modern medicine to fix the unfixable. Many turn up too late and expect miracles

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Under 16 are vulnerable groups that may have no voice and need spectacles to be checked and fitted by a professional. DO or OO.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Money. As always no value or respect for our profession

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No value on eyecare for vulnerable groups. No checking of appliance. Devalving profession.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

It's already gone too far. No respect for our profession

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It's already too late

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Oct scans are great. But remote care not so good. Many tests need to be done in person. Think how many of the public have been mistreated or had serious health issues like cancer overlooked while GPs were doing remote care during covid.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The optometrist has to see the entire picture by performing the whole sight test before concluding what advice/ referral/ monitoring. All the pieces of the jigsaw must fit to solve each patients concerns.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

As above. Professional standards. Litigation

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Could be a lot of misdiagnosis. Doctor google

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Patients have no knowledge of optics. Most dont know how to write a prescription online. But they feel like they are experts in your job. I wouldnt tell an electrician how to wire a plug

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

I am broadly in agreement with the objectives, with one exception. I think the wording of Objective 1 could be interpreted as somewhat complacent - that current patient and public safety is adequate and only needs to be maintained.

As an optometrist with nearly 40 years experience and as an expert witness in over 75 cases, I have seen many examples where patient and public safety has not been maintained. I think this review is an opportunity to ask how the GOC might improve its regulation to better protect patient and public safety.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

1. Contact lens substitution - supplying contact lenses of a different type to that in the specification provided by a registrant.

2. Supply spectacles or contact lenses without an optical prescription from a registrant. As an example, one case I remember vividly is a older man, a retired professional, who avoided eyecare and just bought ready-made reading glasses. Eventually, he saw me after many years without eyecare. He was blind in one eye and visually impaired in the other from advanced glaucoma. He thought that eyecare was unnecessary because otherwise, why would the law allow him to obtain reading glasses without a prescription.

When I first qualified, he would not have been able to obtain reading glasses without a prescription and the law would have led him to have eyecare and saved his sight. The relaxation of the law in the 1980s (I believe) to allow ready-readers without prescription has cost many people their sight.

If the GOC seek to keep the public safe, reverting the law so that eyecare is required for any spectacles to be provided would be an excellent outcome.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sight testing, as defined by the law at present. This should only be allowed by optometrists.

Plano contact lenses carry significant risk and are widely provided without a prescription by non-eyecare professionals. The GOC is failing to maintain patient and public safety in this regard, and any change to legislation should be used to strengthen the GOC powers.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The sale of ready-readers should only be possible to an optometric prescription.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

The current situation is unfair and it seems likely that businesses who are most in need of regulation avoid meeting the requirements for business registration so that can be essentially unregulated. I support the view that all UK businesses providing eye care services and/or supplying spectacles or contact lenses should have to be registered.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

There are many advantages, including ensuring public protection. Also, I have heard of many instances when employers, typically in non-registered businesses, place inappropriate pressure on registrants to prescribe and sell. The GOC Business Standards are good and should apply to all optical businesses.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

I am the governor of a school and I have seen the benefits in terms of compliance and standards of an organisation knowing that a body oversees them with powers of inspection.

I have heard of instances when supervisors are not present, or children by non-registrants without supervision. Also, of pressure to sell or prescribe, in appropriate signage/adverts, etc. Powers of inspection would help avoid/minimise these problems.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

A glance through Fitness to Practise cases reveals the need for higher standards, not a lowering. In my experience as an expert witness in over 75 cases, the GOC only sees the tip of the iceberg, with many cases the subject of civil litigation and typically settled out of court.

I have high regard for my dispensing colleagues, but from nearly 40 years experience I am sure there would be a detrimental impact to public health if the status quo was relaxed to allow dispensing opticians to refract for the purposes of a sight test.

As an example, one of the most moving cases of my career was a young teenager with headaches and a refractive error. It was only after ophthalmoscopy that I saw slightly suspicious optic disc cupping and declined the mother's request for glasses and instead referred. The referral led to the early detection of a brain tumour and the child's life was saved. If the child had been seen by a sight testing dispensing optician instead of an optometrist, the child would almost certainly be dead. How can the GOC, a body dedicated by statute to public benefit, consider such a step?

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Please see last answer for an example highlight that a disadvantage would be an adverse impact on public health including, in rare cases, unnecessary patient death.

The requirement that a sight test includes an eye health check by a professional optometrist who has had four years' training in pathology is an essential safety net for public health. The removal of this safety net, by allowing dispensing opticians to refract, would increase health inequality. This is because better education and higher income individuals are more likely to pay more for eyecare by an optometrist, with lower income more disadvantaged individuals seeking free sight tests, which no doubt the large chains would employ lower paid dispensing opticians to provide. As with other health inequalities, it would be the disadvantaged and ethnic minorities who would suffer.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

On any day in any town centre in the UK, any member of the public could I am sure find an optical practice offering sight tests, often free-of-charge. At present, this includes an essential health check. Relaxing the law to allow refraction by DOs would remove this health check for no benefit. There is no lack of availability of sight tests and there is no cost barrier. So, there is no reason to sacrifice public health.

The only advantage of relaxing the current standards would be to allow optical businesses to make greater profits.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The current system is not ideal, but does ensure broad unrestricted access to eyecare (for example, compare the availability of NHS sight tests, which are widely available, with NHS dentistry, which is scarce).

The only disadvantage of the current scheme is that employers sometimes place undue financial pressures on registrants and selling tactics on patients. If the GOC can increase its powers to regulate optical businesses and enforce its standards of practise, this would improve financial equality and inclusion because less resilient individuals would be better protected from "hard selling".

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Harvey, K., Edgar, D.F., Agarwal, R., Benwell, M.J., Evans, B.J.W. (in press) Referrals from community optometrists in England and their replies: a mixed methods study *Ophthal Physiol Opt.* 42(3), 454-470.

Shah, R., Edgar DF, Jessa Z, Yammouni R, Campbell P, Soteri K, Hobby, A., Khatoon, A., Beg, A., Harsum, S., Aggarwal, R., Evans BJW (2021) Referrals from community optometrists to the hospital eye services in Scotland and England. *Eye (Lond)* <https://doi.org/10.1038/s41433-021-01728-2>.

Evans BJW, Edgar DF, Jessa Z, Yammouni R, Campbell P, Soteri K, Hobby, A., Khatoon, A., Beg, A., Harsum, S., Aggarwal, R., Shah, R. (2021) Referrals from community optometrists to the hospital eye services in England. *Ophthal Physiol Opt.* 41(2):365-77.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

The publications cited in the last answer support the importance of refractions including an optometric sight test to detect pathology.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There are two disadvantages to status quo.

1. substitution: contact lens practitioners carefully fit lenses and satisfy themselves that the lens type and fit is safe before produce a written specification. It makes a mockery of the system for an online supplier to then substitute the prescribed lens type with a different one.

2. plano tinted contact lenses are very easy to obtain without a professional fitting.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

It is important that contact lenses should only be supplied to a prescription from an ECP and that the lenses are exactly as specified.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I think it would be a good idea to remove the requirement to verify. There should be an obligation on the supplier to check the prescription is supplied, under the supervision of a registrant. But as long as this happens, there should be no need to verify. For example, there is no need for a pharmacist to

verify a medical prescription.

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

The requirements need to be tightened, as already there is a public risk from people obtaining plano tinted lenses without a prescription or professional fitting.

If the law was relaxed further this would lead to greater risk and more sight loss.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The requirements need to be tightened, as already there is a public risk from people obtaining plano tinted lenses without a prescription or professional fitting.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

As explained in earlier answers, the public would be better protected if ready-made reading glasses were only available to a prescription from an optometrist.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Please see earlier examples - the requirement for a prescription within the last two years helps to encourage regular eyecare and thus protect the public. If this safety net was removed, it would lead to sight loss and represent a failure to maintain patient and public safety.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I think the current legislation is a good way of ensuring financial and equality, diversity and inclusion because optical prescription require for all, not just those who are most likely to realise the importance of healthcare.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing opticians play an important role and this is particularly important in two scenarios: children's eyecare (because if spectacles do not fit well, the child will not wear them) and sportswear/protective eyewear (because the frame, lens, and fit all need to be appropriate). When these scenarios come together, it is especially important that eyewear is provided by a registrant.

I think the question raises an important additional point. Registered medical practitioners have no training in spectacle lenses, lens materials, frames, or fitting. They should not be able to supervise the provision of any optical appliances.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The current legislation is a reasonable protection for the public.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

As noted above (with reasons), any powered spectacle lenses should only be supplied under the supervision of a registrant.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

see earlier comments.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

OCT and panoramic imaging modalities, and others, have great potential for improving eyecare and the accuracy of optometric referrals.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Please see earlier comments about ready readers and plano contact lenses.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Please see earlier comments about ready readers and plano contact lenses.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Some practitioners regularly breach GOC Standard 6.2, to make appropriate referrals. Research (21. Parkins, D.J., Benwell, M.J., Edgar, D.F., Evans, B.J.W. (2018) The relationship between unwarranted variation in optometric referrals and time since qualification. *Ophthal. Physiol. Opt.* 38(5), 550-561) reveals that some practitioners over-refer. Other research (see below) indicates that referrals are most appropriate when the HES replies to the referring optometrist, yet this is the exception rather than the norm. This is not an area where I can see a way for legislation, but if the GOC could encourage replies to optometric referrals this would be likely to enhance patient and public safety through improving referrals.

Evans BJW, Edgar DF, Jessa Z, Yammouni R, Campbell P, Soteri K, Hobby, A., Khatoon, A., Beg, A., Harsum, S., Aggarwal, R., Shah, R. (2021) Referrals from community optometrists to the hospital eye services in England. *Ophthal Physiol Opt.* 41(2):365-77.

Shah, R., Edgar DF, Jessa Z, Yammouni R, Campbell P, Soteri K, Hobby, A., Khatoon, A., Beg, A., Harsum, S., Aggarwal, R., Evans BJW (2021) Referrals from community optometrists to the hospital eye services in Scotland and England. *Eye (Lond)* <https://doi.org/10.1038/s41433-021-01728-2>.

Harvey, K., Edgar, D.F., Agarwal, R., Benwell, M.J., Evans, B.J.W. (2022) Referrals from community optometrists in England and their replies: a mixed methods study *Ophthal Physiol Opt.* 42(3), 454-470.

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

GOC Standard 8.2.6 is poorly worded and, if taken at face value, is breached by every optometrist every day. The subsequent clarification that was provided really only highlighted a flaw in the original advice. The problem is that optometrists carry out many tests in an eye examination, and no-one individually obtains consent for every test. Presumed consent is widely assumed for the typical tests that any reasonably competent patient would expect to be in an eye examination. At the next revision, I suggest this is reworded as "Consent for any examination or treatment that a patient may not expect or understand to be part of an eye examination".

GOC Standard 9.7 is also often breached when, for example, anyone working at that practice would be able to make a reasonable inference about supervision.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Regarding separating refraction from the rest of the eye test:

It seem to be a change to either placate DO's and CLO's or to make up for a shortfall in Optoms. The first reason is not a good reason, the second requires incentivising more people to train as optoms and creating more training places.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

The current ones that are already restricted

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Several reasons why not:

History and symptoms is a key part of an EE. Who would do this? If the DO/CLO then the optom doing an ocular health examination would be missing crucial information (e.g. spontaneous distortion of vision). If the optom then the DO/CLO may miss out on crucial pieces of information (e.g. one eye amblyopic, sudden onset diplopia, asthenopia when viewing a VDU).

Linked to the above, I had a patient in April 2022 who mentioned vague headaches. Then during refraction they again mentioned the headaches and pointed to their left temple. I stopped the refraction and discussed temporal arteritis symptoms and ended up referring to the GP who confirmed this was the cause and the patient rang me to tell me her markers were so high she was an imminent risk of sight loss etc. The patient had already had an appointment with the GP who had not picked on the symptoms. If the refraction and history and symptoms had been separate I would not have picked up on this subtle hint as to the cause of the headaches. By separating these two parts of the eye test it will be creating situations, such as this real life example, where preventable sight loss will occur that could have been avoided if the status quo for the eye test were kept.

Who would do ocular muscle balance? The DO/CLO doing the refraction, as prism is part of the refraction? If so then who does motility and cover test etc...this is not part of the refraction but needs to be combined with the prism result to inform any referrals or not.

Following the above: What if an optom is given a refraction with prism for a child. Then they do motility on a child and find a muscle issue that needs referral. Does the prism need to be removed from the refraction? Should it stay? Who makes that decision? Similarly for an adult complaining of diplopia. What if a refraction from a DO/CLO shows prism but then a cortical cataract is found on ophthalmoscopy? Does the patient still need prism or is the cataract the cause? Who would determine that and how could they if they were only doing the refraction or ocular health issue? You could argue that the optom could do a recheck but we can be certain that a number of practices would not be allowing time for this in the diary system. Again this could lead to unnecessary harm to a patient...e.g. causing diplopia from unrequired prism, weakening of ocular muscles/ asthenopia etc.

Other crucial information can be gained in a refraction that informs other tests that may be required in an eye test. For example I had a patient who could see down to the 6/7.5 line on snellen...but only the right hand side of the chart. If the refracting DO/CLO only gave a 6/7.5- reading to the optom without any extra information, then other important tests such as amsler and fields may not be done. Clues during the refraction such as a patient moving their eyes/head to eccentric fixate plus a drop in VA would inform whether a test such as amsler is necessary. If only given a prescription and VA would the optom know to check this?

Talking of amsler...this requires a specific add for the working distance in a single vision lens...such as a trial frame. Would the optom have access a full set of refracting lenses in their room to be able to do this?

I feel patients with additional needs will also be adversely affected by this change. Those with limited mobility, social anxiety, fear of medical settings, dementia etc will find it much harder when having to see two people rather than just one. Rather than one person being able to build a rapport with them, so that they settle during the full eye exam, and the best result achieved, information may be lost. For example, often extra information that did not come out in the original history and symptoms is forthcoming when a patient has settled. Some, such as those with social anxiety, may even not come for an eye examination because the thought of seeing two strangers is too much for them.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

See above answers to Q15.

The only advantage I can see is that more optom time is freed up so more sight tests can be done over the course of a month/year.

Another negative is that if a patient comes back complaining of a problem with spectacles, and a DO/CLO does prescriptions, then they will be likely looking at it from a purely prescription/dispensing point of view. Sometimes however it can be sudden onset of an ocular health issue, such as wet macular degeneration.

By the time one or two recheck refractions are done and the patient is passed on to an optom for persistent poor VAs, several weeks and the crucial window of opportunity for best outcome/prognosis may have passed. Or worse still, the patient is just given a refund and no ocular health assessment is done during a recheck with a surprising drop in VA and no referral is done causing permanent, preventable sight loss.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Positives:

Patients understand the current system.

Less risk of preventable sight loss/ health damage to a patient.

Less barriers for patient to attend an eye exam, especially those with greater needs (e.g. autism)

Negatives:

The sight test fee might be lower with a DO/CLO doing the refraction....but as the EE is already underfunded that is unlikely to have a large impact on matters.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

Apart from anecdotal evidence such provided above.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Contact lenses have inherent risks with use. Without proper instruction and supervision there could be permanent loss of vision.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A disadvantage is that someone can be buying CLs online without a prescription and risk losing sight or other issue. I had someone a few weeks ago that had not had an EE or CL aftercare for 5 yrs! His eyes were healthy but his prescription had changed so much he was no longer legal to drive but was still buying CLs to the wrong prescription and driving in them!

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

Is it not fair to restrict the supply of optical appliances without a good reason. Some may not make a good judgement, but someone perfectly healthy may also not make a good judgement call. That is just a human right.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Patients go for the easiest route, especially younger people with less life experience, leading to a lack of care or understanding of risks. It is well known that many do not read instructions/safety warnings, and the same will apply to the use of CLs. A greater risk to ocular health would be made by not regulating CL supply.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage:

Someone could order the wrong strength and cause headaches or have vision blurred enough to cause other risks. Most people do not understand a spectacle prescription, let alone how that may or may not translate into a CL prescription.

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

I have has patients come in after wearing zero powered lenses unable to remove them from their eyes from wearing them the day before. If someone was too embarrassed to come forward for several days...or it is the weekend and they wait until the Monday to seek help, then the risk of severe infection etc is there.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

While there are risks from the wrong PD, heights on varifocals etc, mostly they are low. Certain higher risk people, such as those with a decompensating phoria may have issues caused, but it would be difficult to regulate to protect these few.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It is important to incentivise patients having regular eye exams to be able to pick up on ocular health issues at an earlier stage. Limiting the prescribing of spectacles to 2 yrs from the issue of a spectacle prescription helps with this. An optom would only go beyond the 2yrs if there was a clear benefit to the patient outweighing such a risk...but would have the full history to look at to make such a judgement.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A clear risk is the above. Someone may not have an EE because they wanted to save money (those who buy from non-registrants tend to be the most price conscious) and have important issues missed such as hypertension, diabetes, glaucoma etc.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Only optometrists and dispensing opticians allowed to dispense and non registrants must be in the presence of a registered optician.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Contact lens supply.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Children, elderly and mentally/physically disabled.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not Answered

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Could be incorrect

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Keep the profession running as it is- I would not want to as an optom be signing off on refractions and doing solely health checks

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refracting patients and performing health checks

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refracting and performing health checks

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Optometrists are thoroughly trained to refract and know the limits of how much to change or alter prescriptions

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Financial impacts would hit employed and locum optometrists badly as we trained hard to get to this level of income

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Optometrists are comfortable in refracting and the public have their trust in our refraction

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Optometrists have extensive knowledge on cls and cl related issues so that should be limited to them and CLO's

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It should be left as it is

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Pxs would be more likely to order online

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

They may have not had a sight test in many years and make glasses up and then not be able to see clearly through them

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

It should remain as it is as face to face checking and examining the eyes is a lot more accurate and we can be more empathetic towards the patients too

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Keep it all as it is

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Student optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

-dispensing
-Will be unsafe for them to do refraction,contact lens assessment,ocular health assessment .

7 What activities do you think must be restricted to our registrants?

Please provide details.:

-Doing refraction as a registered optometrist will have the desired training and experience.
-As a student optometrist we have to go through rigorous training for refraction,go through pre reg training after graduating and then become an optometrist so it won't be safe if dispensing optician or assistant does this and will lead to high number of complaints by patients.
-this is the same scenario if a nurse was to do a doctor's job.Without the years experience it would be unsafe for the public and will lead to unnecessary problems.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

These tasks should be restricted to optometrists:

- refraction
- oct scan interpretation
- contact lenses assessment
- ocular health assessment
- referrals
- Assessing eye misalignments

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

- orthoptic training for optometrists so that eye misalignments/ diplopia can be corrected without referring to orthoptics in hospital.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

- lack of training and experience of dispensing opticians doing refraction will lead to high complaints by patients and will be unsafe.
- there would be no division between optometrist and dispensing optician so students in future may not want to study optometry which is a harder course so there will be a lack of opticians in future.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not Answered

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

-all optometrists should be able to prescribe eye medication

-

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Legislative changes should only be implemented if requested by the relevant professional bodies, with reasons as to why they are requested, otherwise there is a perception that big business is "calling the shots"

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Safety spec dispensing

Deregulated and/or remote eye testing

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Children and partially sighted dispenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

That is what we have professional bodies for.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction on its own is not suitable for anyone other than big business who are only interested in selling spectacles. Health of the Px HAS to be at the centre of everything we and you do, and this is patently not going to improve Px health options.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantage - Big business can make more money.

Disadvantage - small business would be forced out of business or forced to charge for a proper eye examination. Patients would lose the ability to have an important health check which, as I'm sure you are aware, can pick up many other health issues.

People would assume a refraction is an eye examination and the risk is that people could go blind. What is the benefit that outweighs that????

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage - bureaucracy stays as now

Advantage - Patients have access to high quality eyecare every time they have their refraction checked.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

common sense dictates that any screening is going to save some sight

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Legislation needs to change to stop substitution being legal unless specified on the Rx copy.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes - please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

As now but add on Safety specs and complex Rx

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

better safety spec safety

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Even more substitution and wrong Rx wearing would occur

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Checking fit vision and care regime, as well as advice on future lens possibilities

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

No increased risk as they are sold nowadays and nothing is done about it. Doesn't mean its a good thing though

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Lack of full eye exam could mean problems not spotted during regular exams

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The fact that there is no evidence that it could cause harm is not a good reason to allow it to happen.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Student optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

I think there should be questions on whether some provisions in the 1989 Act is too business like and not fit for the modern direction of a more healthcare based setting in which optometry is following now.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Certain children dispensing, certain vulnerable groups of people who have low vision or complex vision patients eg, nystagmus, strabismus, albinism.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Certain children dispensing, certain vulnerable groups of people who have low vision or complex vision patients eg, nystagmus, strabismus, albinism.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should not be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

To try to advertise products/coatings/multifocal/progressives instead it should be the optometrist doing this thus following an approach to patients need.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

I think that regulation of businesses should be more in line with the 1959 Act not the 1989 Act as I have heard quite a few times customers come up to me saying that they are not happy with optical practices as they always focus on business side of things not the healthcare side of things and that they are pushed into buying the wrong frames and lens choices. I think that optometrists should be focused more on healthcare rather than business and this will help break the stigma link between patients and optometrists.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

The one in 1959 Act as I have seen many patients talk about the good days of when the NHS funded lenses and when optometric practices focused on patients' need rather than the untrue stigma that it does not.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Ocular albinism as they require a special level of tint as cited by research papers.

Strabismus as they require special dispensing of prism when necessary.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

As zero powered lenses can cause major impact on the corneal infections and that RGP's should be recommended first as they have the lowest amount of risk.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Yes as they often are prescribed things that are sale based and not of great benefit for patients. Secondly px are restricted to certain frames as certain measurements are needed to fit the patient but this could be mitigated if they forced all frames to be custom made. I have seen many marks on px and also I have seen many patients like a certain frame but that it does not fit them and then they leave frustrated.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

I think that lenses should be funded entirely by the NHS as it is punishing that people who require thinning (due to anisometropia and aberrations) as they have a relatively high prescription have to fork out at least £105, also when they require multifocal/bifocals/progressives they have to fork out sometimes at least £300 for a pair of glasses (just due to age and conditions when other's do not need to as this is fundamental for even the basic tasks) when they should not need to as this puts them at a disadvantage to the public through no fault of their own. Lastly, I think that lenses should be manufactured and customized entirely of the patient's need as that should prevent them looking in the wrong portion of lens and prismatic effect. This is not followed by all stores unless if they have a spherical equivalent of 3D.

Lastly, many patients talk about the "good old times", notably before the 1989 Act when it comes to glasses and are not looking forward to the future of optics as they feel it is very business like despite the focus on healthcare by many OPTOMs around the country

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Reasons specified in question 43.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I have seen [redacted] cause problems with dispensing as I have seen someone use them then it caused all the PD's to be wrong and all of the heights to be wrong and this went undetected until they collected it and this caused great discomfort but it was resolved quickly and we had to issue new pair of glasses free of charge. Now we have to use rulers which I think is a step forward in the right direction.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Detailed in question 46.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Enforce rulers instead of [redacted] dispensing as this would be a tried and tested method with no fault.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I specified my reasons earlier but I think everything in the 1989 Act should be repealed and the 1959 Act should be enforced while keeping the independent prescribers and except the professional definitions of Optometrists/DO,s/others and the CPD Areas which are improving patient care.

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Yes as specified above. Also, will help to remove stigma in Optometric practices.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Not sure what your trying to achieve here.

I can't see any advantages to the profession.

Your proposed changes to effectively a 2 tier eye exam and deregulation of supply optical appliances sounds like it is being commercially driven rather than enhancing eye care and protection of sight.

You should be promoting the profession to a higher level, as in dentistry.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Supplying and fitting of any type of contact lens including plano cosmetic. Why this was ever decided that that this was lawful is beyond me.

Refraction.

Ophthalmoscopy

Child dispensing

Complex Rx dispensing

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction.

Ophthalmoscopy

Contact lens fitting and supply, including plano cosmetic

Child dispensing

Complex Rx dispensing

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Discussion of Px's eye conditions (if any)

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

I cannot find your 2013 review of business regulation

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

as above

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

For instance the (still) unregulated supply of on line contact lenses.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

No.

This would over complicate the eye exam. Would the DO understand and be able to adjust any BV abnormality for instance. Would the DO be able to ensure that any incomitancy is 'normal' and not disease bases?

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

This would over complicate the eye exam and make the Px journey more complex.

This is really a backward step, making the UK more like France for instance.

This also sounds like a [redacted] driven idea to get more Px's through the 'till'.

It would become a 2 tier eye exam with most Px's electing to have a refraction only as "there is nothing wrong with my eyes".

You see this happening in practice already when most will elect not to pay for an OCT exam as "their eyes are ok".

This is such a backward step and another way to devalue our profession.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There are no disadvantages of the current sight testing regulation staying as it is unless you are using this to get more Px's through the practice for a 'quick' refraction and selling of specs.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

Logically the number of Px's with sight loss that could have been prevented if they had had a full eye exam rather than a "quick refraction" will increase.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The regulations regarding supply of cosmetic plano lenses and on line lenses needs strengthening. At the moment anyone can get any lens.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Px will just buy what they like 'on-line' which will not fit correctly

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The disadvantage would be the obvious that is incorrect lenses supplied leading to increased problems, increased disease, increased loss of sight.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

To be undertaken by a qualified optometrist or CLO.

Assessment of vision

Assessment of fit

Assessment of corneal health

Assessment of tear quality

Assessment of adnexa

Advice on lens wear and care

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

There is no difference to the danger or sight loss caused by plano lenses or prescription lenses. They both endanger sight if not fitted correctly and aftercares not followed.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

There would be far less harm to Px's if plano lenses were regulated. Of course it would. Who ever decided that it was safe for an unqualified person to supply and fit plano cosmetic lenses really was an idiot.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would not impact a practice financially as these wearers do not attend.
It will continue to impact A&E as these Px's present with problems.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

This further act to decrease the professions brand.
The profession would look even more like car sales.
Increased Px dissatisfaction because ill fitting appliances.

You really need to think like the dentists. Increased regulation, increased professionalism.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

The 2 year restriction is to try to ensure that the Px returns for regular eye exams to prevent loss of sight.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The 2 year restriction is to try to ensure that the Px returns for regular eye exams to prevent loss of sight.
The outcome of your proposal would lead to more loss of sight as Px;'s would say "theres nothing wrong with my sight, I just need new specs"
This happens in China, they don't attend diabetic screening until the diabetic eye disease impacts their field of vision.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

incorrect fitting leading to increased eye trauma

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no disadvantage

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

It depend on what you mean.

Remote disease detection would be an advantage, especially in remote areas but as most GP's would say that on line/phone consultations are very difficult (during covid) as you can't see the 'whole' Px

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

apart from cosmetic plano contact lens supply

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

Dispensing Optician and Student Optometrist

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

They should not be able to dispense under 16's or patients registered sight impaired or severely sight impaired, or safety spectacles without direct supervision.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Testing of sight. Fitting of CLs.

Dispensing of spectacles to under 16's/SSI/SI should be under direct supervision of OO/DOs.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dispensing of safety spectacles as this is a medical device it should at least be directly supervised to ensure the correct frame and lens is being dispensed.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

I can provide a perspective about this from a dispensing opticians point of view and from a pre registration optometrist!

As a qualified dispensing optician I do not believe DOs have necessary training/knowledge to refract safely because of the lack of understanding of binocular vision and how pathology can affect refraction. It is in the patients best interests that the refraction and health checks are done by the same practitioner. Just like it is recommended that the sight test and dispense are performed in the same practice.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

This would positively impact DOs because they would have a more varied role within practice. However I am unsure if DOs ultimately WANT to be refractionists. If they did why have they not gone to university to study optometry like I did. A disadvantage is that a patient is having to explain things about themselves to more than one practitioner, first the refraction and then the health check. I think this will reduce the respect of both DOs and OOs and make people not think about the importance of health checks for their eyes because testing of sight and eye health checks will be separated they can just see a refractionist and get new spectacles and negate the fact of a health check.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I do not think there are any disadvantages of things continuing the way they are. I do believe that contact lens opticians should be able to undertake additional training to manage anterior minor eye conditions however I think this should be the limit. I think that dispensing opticians should have more capabilities of dispensing low vision aids they should get more practical training on this and Measuring visual acuity and teaching patients steady eye strategies and eccentric viewing etc.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I know myself within the last 2 months I have referred 9% of my patients for secondary care.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

I am not aware of any studies in this field. I can only offer my opinions. Respect of optometrists is already low do not lower it more than it is now by separating refraction and health checks.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There are no disadvantages I think dispensing opticians should have additional training ie CLOs in order to fit CLs.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes - please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Safety spectacles - frame and lens options can only be adequately discussed by a professional to ensure the correct product is dispensed and the correct advice is given this could mean the difference between a patient losing their sight or not.

Patients with special needs also and those with prescriptions +/-10.00 or more (complex) as dispensing opticians are specifically trained to help choose frames/discuss lens options and are experienced enough to know the implications and how the finished spectacles might look.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financially this would be beneficial to practices because there is less chance of remaking spectacles due to poor product quality or lack of information given to patients managing their expectations. Financially also beneficial to patients because they receive correct advice and more likely to be happy with finished spectacles as sometimes they may not wear specs they are unhappy with.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

They should be verified and a log should be kept. A copy of rx or CI specification should be signed by OO/CLO

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients could end up with incorrect CI which are still a medical device. Shall we send a patient away with lenses they have a car accident and it's our fault. Or the blame the prescriber thinking it's their fault when in reality they bought CLs from another seller who did not adequately verify their specification and have provided incorrect lenses. Shall we send an amputee patient away with a leg that doesn't fit their leg properly?

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Yes it should define what is done in an aftercare because there is so much variety between practitioners so patients don't have any consistency

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Still a medical device. Still provides all the same risks to eye health that lenses with power do so why should it have different laws

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Risks are still the same therefore care should still be the same.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There are no disadvantages. There are advantages that patients will be properly cared for in optical practices. The correct advice will be give. This means they are less likely to have an eye infection and end up in hospital costing the NHS money.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

Illegal sellers are not adequately identified nor punished. Why does it take other practitioners to report offenders. They should be actively sought by the GOC and prosecuted irrespective of anything else.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

This is necessary. Patients should not go longer than 2 years between sight tests unless is special circumstances deemed acceptable by a GOC registered practitioner.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients may not realise they are using an out of date rx nor the importance of a new sight test this could cost the patient extra money putting things right. Could cost the business money putting things right. This could cost the nhs money treating patients with things that could've been prevented or treated earlier.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There are no disadvantages to it remaining. The advantage is that patients realise the importance of regular eye health checks.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This could mean that patients end up with eyewear that does not fit correctly nor the satisfy the prescription like the prescribed intended because it has not been checked by goc registered professionals.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There are no negatives. Patients will end up with the best quality care.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

It should be a practitioner decision as to whether online or in person consulting should happen.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The act should dictate who's responsibility it is to find unregistered sellers and what punishment they should receive and what punishment they should receive for repeat offending.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

GOC should be responsible for finding and prosecuting unregulated sellers in order to protect the general public

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Any sale or supply of optical devices

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Any sale or supply of optical devices

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Amendments would be required in the curriculum and teaching of Dispensing Opticians. The inclusion of this responsibility would require extra training/CPD for existing Dispensing Opticians to acquire the required skills/ability.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

All vulnerable adults

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Ensures all vulnerable groups are cared for by a registrant.
More care would be required to identify patients that sit within the aforementioned vulnerable category.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Likely negative impact, more opportunity for errors if not being verified by a registrant.

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This would put the public at greater risk.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Remaining as is mitigates the risk and ensures the public are being protected

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This would put the patients at greater risk

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This helps to protect the public

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

The sale and supply of all optical appliances should always be conducted under direct supervision

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Online sale of optical devices should be abolished

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Any of the constituents which currently make up a sight test or eye examination, including but not limited to;

- History and symptoms
- Refraction and visual performance tests
- Ocular examination and interpretation of any additional relevant tests.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

All of the above

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Delegation of such responsibilities to a suitably accredited dispensing optician would potentially increase capacity of optometrists but an oversight is necessary. Visual problems rarely relate solely to refraction, and any change to regulations would need to ensure the role of the optometrist is protected to continue providing suitable analysis and any additional checks as necessary to ensure public safety.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The clinical components of sight testing and eye examination aside from refraction, are already under valued and underfunded. In high street practice, it is well known that provision of services alone is a loss leader and that these services can only be funded by the additional revenue which spectacle sales provide. The separation of refraction from "ocular examination" would lead to a system where the focus of practice owners would be on providing refraction and the supply of spectacles as cheaply as possible. The cost of providing any additional health related services would therefore no longer be cross subsidised either resulting in reduced provision or substantially increased fees which I suspect the DHSC would be unwilling to meet. Public eye health would undoubtedly suffer as a result.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I cannot envisage a scenario where either increased or decreased legislation would be beneficial

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes - please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Adult patients who, through learning difficulties or disabilities, present similar demands for expertise as those required for under 16s.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Circumvention of rules related to sale and supply of contact lenses by online companies has been widely documented. Contact lenses are readily available without any written specification and these loop holes need addressing.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

The objectives proposed will provide more confusion for the public as to who is examining them and for what purpose. Splitting services over several practitioners will weaken the patient/practitioner relationship and result in poorer eyecare for patients.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction

Interpreting results of fundus imaging.

Dispensing of under 16's and visually impaired

Contact lens sale and supply

Selling of zero powered contact lenses

All of the above should be done under direct supervision. i.e. on premises and in a position to intervene.

The current GOC rules on the sale and supply of contact lenses are frequently ignored. The GOC's enforcement of these rules is virtually non-existent. This results in a free for all and a race to the bottom!

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye examinations including refraction

Interpreting results of fundus imaging.

Dispensing of under 16's and visually impaired

Contact lens sale and supply

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

All businesses supplying spectacles are providing medical devices. They should and must be registered and regulated.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Registering and regulating all businesses providing eyecare and spectacles would ensure a level playing field for all. Patients can then purchase optical care and products from all providers knowing that there is recourse to the UK optical bodies.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

VA, refraction and ocular health are all linked.

For some people 6/9 VA is perfectly normal, for others it's a sign of imminent pathology and vision loss. Splitting parts of the eye examination out does

not provide holistic care for patients.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

VA, refraction and ocular health are all linked.

For some people 6/9 VA is perfectly normal, for others it's a sign of imminent pathology and vision loss. Splitting parts of the eye examination out does not provide holistic care for patients.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

9% Available from our PMS system

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

There won't be any evidence as it has never been done!

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The current rules on contact lens fitting are largely ignored.

The GOC is toothless in this area and rarely takes action against breaches.

Rules need to be tighter and enforced. It is a weekly event where I come across patients being supplied without contact lenses aftercare and even self prescribing.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The current system is providing a competitive advantage to those merely selling lenses and not providing care to patients.

This is leaving the public at risk

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

The current restrictions are adequate

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

The current rules on verification are ignored. Despite it being a daily occurrence where I come across people buying lenses online, I cannot remember the last time I was asked to verify a prescription.

The current system is not fit for purpose and is being ignored.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Patients are at risk.

Currently if a patient buys online, they should access their care from whoever supplied them lenses. The majority of these suppliers don't take on this responsibility, so patients turn up at minor injuries units and A&E with contact lens problems.

This is a waste of NHS resources and is a direct result of ineffective rules putting patients at risk.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

No-one does it, it's been years since I last had a request!

Patients can go on a website and order whatever they want without checks!!!

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Nothing would change, no-one does it anyway leaving the public at risk.

The GOC is failing in its responsibilities with regards to regulating contact lens supply.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Examination of the lens in situ.

Examination of the anterior eye.

Verification of lens fit.

VA assessment and over-refraction.

Solution review (if required)

Discussion around wearing times

Discussion on hygiene

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Optometrists are correctly bound by GOC rules on supply.

Fancy dress shops ignore this and sell them over the counter without checks.

Suppliers of these products need to be held accountable for who sells and supplies them, fancy dress suppliers are frequently ignorant of the law, the suppliers are fully aware of the law and are ignoring it (or using loopholes).

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

All contact lenses pose a risk if not used and fitted correctly, zero powered lenses are no different

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

The law needs to be tightened to ensure that zero powered lenses are treated the same as all other contact lenses. The risks are the same, if not greater.

Suppliers need holding to account when they sell to non-registered optical businesses

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There current law is not working.

It's being ignored, giving a clear risk to patients.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

All businesses supplying optical appliances (a medical device) should be registered with the GOC

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

With approximately 25% of the patients we refer being asymptomatic, this would undoubtedly result in pathology being missed and sight being lost unnecessarily.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

With approximately 25% of the patients we refer being asymptomatic, this would undoubtedly result in pathology being missed and sight being lost unnecessarily.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages in remaining

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Sales of optical appliances to under 16's must continue to be done by registered persons.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The practice of companies registering websites outside of the UK and sending products in from abroad bypassing UK legislation needs looking at.

Many of these websites have .co.uk domain names giving patients the impression they are buying under UK rules when they are not.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Ensure all websites with a .co.uk domain are registered with the GOC and following UK rules.

Making sure spectacles and contact lenses are treated as medical devices and ensure that personal importation of them follows the same rules as other medical devices.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction (testing of sight)

Contact lens fitting

Selling spectacles to under 16s

Selling spectacles to visually impaired

Selling zero power contact lenses

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction (testing of sight)

Contact lens fitting

Selling spectacles to under 16s

Selling spectacles to visually impaired

Selling zero power contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Completion of occupational forms for VA and ocular details

DVLA VA / visual field tests

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction and assessment of VA is an integral part of the sight test.

I can think of two recent examples in 2022 where patients presented for 1) a contact lens follow-up reporting that her new multifocal contact lenses were not giving good VA and 2) a patient returning for recheck early as thought her glasses were incorrect. Because of the suspicious and specific nature of the patients symptoms and the demonstrable drop in VA, I decided to perform OCT and discovered both patients had Wet AMD.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Positive - Optometrist would be able to concentrate more on clinical care, but this isn't currently funded to a workable degree by the NHS

Negative - Optometrists would need to train to a higher degree to perform extended clinical services but funding for this is not great
Also see above, potential for sight threatening pathology to be missed

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

NHS eye test is under funded and financially non-viable

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Positive - The current system of supply of services by highly trained professionals works well but it is under funded.

Negative - It is possible that the current system is holding Optometrists back from progression to a more clinical-based system, but at present the funding for this is lacking.

I have personally had to pay twice now for IP theory courses as I wasn't able to get a hospital placement for my HES training within the two years of completing the first theory course - I was let down by two different hospitals. In the end I have had to become a part-time HES Optometrist just to secure a hospital placement. My employer or local NHS provider wouldn't pay for the training courses so I have had to pay these myself.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I personally refer about 1 patient a day from my clinic of 12 patients a day

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

My own experience from the two patients above and many others including an undiagnosed brain tumour (Normal VA but typical field defects), a child with retinoblastoma (normal VA but white reflex with retinoscopy), carotid artery partial occlusion normal VA but symptoms triggered an immediate referral to eye casualty - consulting medic said my actions had saved the patient's life, A young lady with normal VA but whooshing sound in ears and headaches turned out to be idiopathic intracranial hypertension, lady with sudden onset thunderclap headache but normal VA. immediate eye casualty referral revealed burst brain aneurysm - attending medic said my actions had saved the patients life.

There is always the risk that if a patient sees two practitioners, one for refraction and one for clinical assessment, or if the refraction is completed autonomously by a DO without an Optom present, that vital piece of information needed to reach a diagnostic conclusion may be missed. This can have dire consequences for the patient, practitioner and the profession as a whole.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

We hear cases where patients have been prescribed one lens and supplied another by unregistered online suppliers. often as they are cheaper for the patient. The GOC should be able to track down and deal with this problem

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I am not certain that a contact DO would have picked up the Wet AMD case reported before, unless they had experience in medical retina and were trained to use and interpret OCT.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Under 16s

People with visual disability

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These groups can be more challenging to examine and require additional skill to obtain a correct result.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Yes, online suppliers have been known to supply lenses without a prescription and change the lens type without supervision or change of perception from the Optom / CLO

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

If the supervision requirements were relaxed suppliers would be free to supply lenses to patients who may need an eye exam or contact lens check, they could supply additional lenses to patients that have been told not to wear lenses by the practitioner for health reasons, change lens type, prescription etc

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients may end up with lenses that are not suitable for them

They may order lenses when they have been told they shouldn't wear them for health reasons - acanthamoeba / corneal ulcers may increase especially if the patients have not benefitted from advice about how to avoid these issues.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Yes there should be a minimum number of clinical assessments to assess the patients VA and eye health performed by a practitioner trained to see contact lens patients and with up to date contact lens CPD

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

People want these lenses for parties usually, often non contact lens wearers without training in insertion, removal and infection prevention. These people will often buy these lenses online without any pre assessment or training, then we as the eye professionals have to pick up the pieces when things go wrong, eye infections, corneal trauma from bad insertion/removal techniques etc. GOC should have the power to prevent zero power lenses being sold without prescription

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Yes more infections and corneal/conjunctival trauma, more emergency appointments for practitioners to remove lenses that people can't themselves as never been trained and more cost to the patient or NHS whoever is paying for these extra services

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Legislation will help to reduce the above issues
GOC needs more power to chase non-compliant online suppliers though

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

For the patients that use these lenses, education is needed so that they see a practitioner first before having the lenses. Problem is these lenses are often bought on a whim or at the last minute and online purchase is so easy and natural for the younger generation. I have been told that these lenses may even be shared between friends without disinfection between!

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Optical appliances should be checked before supply. We had a patient supplied with online glasses after our refraction. Patient could see, online supplier didn't check the glasses just told the patient to come back to see us. Glasses were focimetered and found to have -3.00 cyls instead of -3.00 spheres. As a gesture of good will we changed the lenses for the patient but lost out in terms of lens cost and appointment time, for an NHS patient where the fee paid doesn't cover our costs this is not good from the business perspective.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

see below

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients may have pathology that is missed
VA may not be as good as it could be
VA may be below that legal for driving

With the current NHS fee as low as it is we need income from glasses sales to stay afloat.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Higher chance to detect asymptomatic conditions such as glaucoma
Higher chance of detecting patients not legal to drive due to cataract and referring on for cataract operations - better safety and quality of life.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Same reason as per non-sports wear optical appliances

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages - Poorly fitting appliances may not protect the Childs eyes from impact. Prescription may not be checked so child may experience blurred vision, eye strain, headaches.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See above

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

There is a general rule that the supplier of the spectacles sorts out any issues if the patient has issues as they are the ones who get the money for the sale. With unregistered suppliers they usually send the patients back to the practitioner that performed the eye test, forcing them to spend time and money sorting out the issue. Legislation should reflect this such that any supplier registered or not would have a legal duty to sort out any issues. The reason unregistered suppliers are cheap is because they have no responsibility to the patient. They take the money and say not our problem if issues arise.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is safer for there patient to keep things as they are.
unregistered suppliers are thriving on the good nature and duty of care of registered practitioners.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

GDPR makes it hard to discuss cases in forums with colleagues, it is necessary to get written consent before an image can be posted on a secure private forum or [redacted] group. This puts most practitioners off posting and in the long term is bad for practitioners education and therefore bad for patient care.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Testing of sight

Fitting contact lenses

Completing a contact lens teach and signing off without this being checked by an OO or DO.

Selling zero power lenses

Dispensing to under 16s or those with a medical condition (eg dementia). An unqualified person advising someone who does not understand what is happening or cannot adjudge that this is the right corrective devise for them cannot provide a positive image for the profession and does not ensure that the patient is well advised.

Having a title that is close to dispensing optician as this causes confusion. I have spoken to many people who thing that a dispensing whatever or optical whatever must be a qualified person. This needs to be standardised.

You would not expect an auxiliary nurse to be called a nursing consultant/a nursing stylist etc. We need to fall into the same pattern of titles as the rest of medical health organisations. Optical Assistant might be more appropriate.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Contact lens teaches restricted to DO, OO or CLO

Fitting of lenses restricted to OO or CLO (with additional qualification)

Fitting of specs and advising on lenses for U16, those who mental health issues that affect decision making, such as a person with dementia; a person with severe restriction of movement such as neck immobility, should be restricted to DO.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Roles in practice such as safety officer, or overseeing that hazardous waste is allocated to correct boxes.
Chaperone duties for young person who asks for that facility.
Either of these should be covered in the teaching of legal regulations to registered DO and OO.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

It gives the GOC teeth!

At present you wait for someone to approach you about issues, not all issues are readily visible to all workers in a company.
Inspection would change the balance between companies and the legislative body.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Not sure what the regulation of pharmacists is

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

the DO should receive additional training and qualification for this function.

There has been discussion in the optical press about OOs being booked 'emergency appointments' when the patient has nothing wrong with them and just want a new prescription to buy online.

Separating the sight test from the eye examination would impact less on the time available for the OO to see emergency patients.

It also has the benefit of making the distinction between testing vision and the medical role of the OO clearer to the patient.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I do not think this will impact on equality or diversity.

Financially the impact should be positive for practices as the (more expensive) OO may be better used for their main function, leaving the DO to complete the role related to the considered and qualified dispensing of specs in the interest of the patient.

It would need to be included in legislation that if the DO observes anything that needs to OOs attention the patient will be handed over.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Currently patients think the only person who can help them is the OO (usually referred to as the 'Optician'. A clearer progression of professionals within the practice may result in OOs not being encumbered by patients they did not need to see.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Current legislation is in the patients interest.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes - please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Dispensing Optician and OO or CLO

Some vulnerable patient cannot make a clear decision as to the benefit or otherwise of what could be a very expensive item.

For those with physical problems measuring a PD or centres of lenses may not be sufficient. If someone cannot raise their head or move their head from side to side the lenses must be selected carefully to be the correct design for that patient. This can include advising bifocals over PPLs etc,

For a profession that places a lot of store on its professional qualification system and where there is an increase in movement of tasks from hospitals to OOs in practice, it is not professional to have an unqualified assistant 'selling' spectacles to someone who should be supported to make a professionally advised decision to meet their needs.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I think that the standing of the profession would be enhanced by greater clarity between professionally qualified staff and those who do not have sufficient knowledge beyond the standard dispense.

It has been obvious for years that patients just think we re there to sell specs (Prof Darren Shickles work showed that clearly and was discussed on Eye TV some years ago. nothing has changed.

I also think that using a DO to dispense to those who are vulnerable, or those who due to disability cannot make an advised decision without clear advice would show that we are not there just to sell them glasses they cannot afford. It may make practices more inclusive and they could become a hub for optical advice. It would improve equality and diversity in patients. I have often been told that the Optician should be the first port of call for an eye condition and advice. Most will go to their GP or to the pharmacist. For the greater integration into the NHS we need more advertising of the Optical Practices role and for patients to recognise us as part of the Health Service. Now is a good time for this as practice staff have been wearing PPE and the advice to visit has been the same as for the NHS.

There may be some negative effect on practices as we transition to being a health care organisation but i do not think that tis is permanent. Sometimes, if you look after granny well, the rest of the family will follow.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Depends on the change.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients may get the wrong lenses. I noticed that those patients who attended CL appointments with problems were buying online. Cost is seen as more important.

Again, I think that we need to boost our professional status.

When I go to the Dentist he checks glands around the neck, condition of tongue and throat does tells you he is doing it. I get a very professional explanation of what he is doing and why, while he works. We should be aiming for this standard. Supply should come with an explanation of what is being checked and why. Quite often lenses are checked and put on one side with the Px record cards. the Px rushes in and someone hands them their lenses. The PX has no idea that the lenses are checked. All they know is that they order them and they arrive. Why would they not go to an online seller?

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Contact lenses can cause corneal issues and physiological changes within the eye. these are relative to the power of the lens. It is in the patients best interest to have the suitability of the material and the fit of the lens checked before supply.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage to patient for health of eye.

Disadvantage to practice if legislation removed and CLs causes physical problems or infection. Bad news spreads more quickly than good.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

This protects the patient and ensures that they have an examination which may find factors that need treatment and could permanently affect their vision

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

In my experience the choice of some people not to go for an eye examination has nothing to do with cost. They just think nothing has changed so why bother.

If we explain to them that the examination can detect conditions early and may make treatment more effective.

Some patient who are on a limited budget may feel that they can self diagnose and just buy a stronger pair of specs or a cheap pair of ready readers at the detriment to their eye condition.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Those patient who do not realise the problems they can have with eye health will not be protected by an eye examination.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Protect children and ensures that they get the best advice. Myopia control is a major factor for young people and research is showing that benefits come from correct dispensing.

Ensures that sportswear is suitable for the patient and fits well.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If bought via optical practice will meet safety standard needed.

Cost may be an issue for parents and could affect inclusivity.

Cheap sportswear not meeting standard give a false sense of protection and may not protect child adequately.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Cost can be impact on inclusion.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Cost can impact on inclusivity

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

need to have standards for supply. I have seen some Rx dispensed to the nearest 0.50D.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

There should be no such thing as an unregistered supplier.

Even if these are not owned/worked in by someone qualified or formally registered, they should come under the remit of the GOC to ensure that the patient is protected.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Supply of contact lenses. Every practice should have a clear poster explaining the methods of supply and the process. I have had first year students who think you can just hand them out.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Testing of sight forms a key part of the sight test with very real implications with regard to the health of the eyes. The 2 are not divisible and by allowing them to be separated we would reduce public confidence in the profession and undermine patient safety

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

By allowing a dispensing optician to refract you undermine the industry and the high standards we seek to maintain. It comes across as an attempt by major companies to reduce the costs of providing a sight test, and changes made to put profitability in front of patient safety should be rejected.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The only problem that I see with current legislation is that the NHS fee no longer represents fair value to the practice.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Given that these rules simply aren't enforced I shouldn't imagine the course any difficulties. It is a significant failing of the GOC

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

In so far as it also defines what constitutes a sight test

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Dispensing under 16s. Supplying contact lenses (plano or rx) without a verified, in date sight test and CL prescription. Dispensing to blind/partially sighted patients. Sight testing. Refraction. Fitting and aftercare of contact lenses.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Dispensing under 16s. Supplying contact lenses (plano or rx) without a verified, in date sight test and CL prescription. Dispensing to blind/partially sighted patients. Fitting and aftercare of contact lenses.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

Delegation of refraction to Dispensing opticians - under supervision of an optometrist, would allow patients more flexibility in when and where they have their visual acuity and prescription assessed. This supervision could even take the form of remote supervision, with the Optometrist utilising the information from OCT, fundus photography, visual fields, tonometry and autorefractometry (already delegated tasks to trained staff in store), to have a full overview of the patient's ocular health. The final part of the routine could be performed via a remotely controllable digital slit lamp with Volk attachment, controlled by the optometrist, would complete the usual routine carried out in person in the test room.

With refraction being able to be carried out by Dispensing opticians, practices in remote areas could run a clinic, with the DO in store and the optometrist in another location, remotely supervising the overall examination and with the ability to intervene and recommend further tests or referral as necessary. More frequent refraction only appointments (perhaps yearly?) would give our profession more opportunities to intervene early, if a patient's visual acuity or prescription changed markedly. The change in visual acuity or prescription, may indicate a more serious underlying issue, which could then allow a swifter diagnosis of issue, that may not have been detected for 2 years or more, if the patient followed the usual routine appointment model. The usual 2 yearly examination, would involve both refraction and ocular health assessment, as it currently does, but this could still be delegated to DOs and optometrists, with the optometrists signing off the prescription and assessing the ocular health, either in person, or remotely, using the appropriate diagnostic equipment.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

By allowing dispensing opticians to carry out refraction, this would allow optometrists to dedicate more time to ocular health assessment and management, allowing more patients to be seen in practice, reducing the demand on Primary Eye care in eye hospitals. If refraction was delegated to Dispensing opticians, practices in remote areas could run a clinic, with the DO in store and the optometrist in another location, remotely supervising the overall examination and with the ability to intervene and recommend further tests or referral as necessary. This would give patients access to more locations to have their sight and/or ocular health assessed, especially in remote, or areas with limited healthcare resources currently. It would also allow optometrists to see patients in various locations, on the same day, by utilising the current equipment that can be operated by an appropriately trained technician and assess the results remotely. This would be further enhanced by the use of a remotely controllable slit lamp with volk attachment. More frequent refraction only appointments (perhaps yearly?) would give our profession more opportunities to intervene early, if a patient's visual acuity or prescription changed markedly. The change in visual acuity or prescription, may indicate a more serious underlying issue, which could then ensure the patient was referred to an optometrist, allowing swifter diagnosis of issue, that may not have been detected for 2 years or more, if the patient followed the usual routine appointment model. The usual 2 yearly examination, would involve both refraction and ocular health assessment, as it currently does, but this could still be delegated to DOs and optometrists, with the optometrists signing off the prescription and assessing the ocular health, either in person, or remotely, using the appropriate diagnostic equipment.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The time taken and the distance needed to travel to an appointment, deters a lot of patients from attending regular sight or ocular health checks. By allowing delegation of the refractive element to Dispensing opticians, under remote or instore supervision of an optometrist, would mean more appointments would be available, in more locations for patients to access. The remote examination of the patient's ocular health, could either be performed on the same day, or at another time, either in person, or utilising remote care with results from such equipment as OCT, fundus photography, visual fields and even the use of a remotely controllable slit lamp with volk attachment, would increase the 'reach' of one optometrist to more than one practice in one day. This would increase patient attendance and could reduce demand on primary care.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Contact lenses should still only be fitted and checked by a registered CLO or optometrist, either in person, remotely, or via an Ophthalmic technician under the remote supervision of a CLO or Optometrist, ensuring patient care is kept at the forefront at all times. The way in which this care is delivered should be allowed to reflect the modern practices that began during the Covid-19 Pandemic. The use of telephone or video triaging of patients should be allowed to continue. The option then, to attend for a health check and cl in situ check could then be carried out on a different time, perhaps even remotely, if a digital remote controlled slit lamp was available, where the ECP could be in one location and the patient in an alternative location. Increasing the availability of appointments to patients and improving patient compliance, as more locations could be available to them to attend. The issuing of alternative contact lenses which would allow a successful CL wearer to continue with wear, if their current lenses were not available, should be left to the professional judgement of the eyecare professional. Providing the current prescription had not expired.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients may self prescribe, or order incorrect the rx. I have personally seen evidence of patients with a toric rx ordering spherical lenses online as they did not understand their rx and the seller did verify the rx. Or order + instead of - powers. Also supplying plano cosmetic lenses with no advice on I&R, cleaning or general eyecare, results in patients risking their ocular health.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Assessment of the following:

The discussion and recording of px's health, medication, ocular history, family ocular history, occupation, hobbies, current wearing habits - hours/day, days/week.

The discussion and recording of any signs or symptoms

The fitting of any prescribed CLS.

The health of the ocular adnexa, including lids, lashes, cornea, palpebral and bulbar conjunctiva, sclera, anterior chamber, iris, anterior and posterior crystalline lens.

The visual acuity for distance and near tasks, and any over refraction required.

Advice on any ocular health issues and any OTC remedies

Referral to optometrist or HES if required

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Regulating the supply of zero powered contact lenses to only registered professionals protects patients from unnecessary risk to their ocular health

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

A remotely controllable slit lamp, currently in the final stages of FDA and CE marking acceptance, would allow an eye care professional to be able to see patients remotely and conduct a full anterior and posterior (with Volk attachment) assessment of the patient's ocular health and CL suitability/fitting. This would allow the same examinations to be performed remotely, as can be done in person. Such as visual fields, fundus photography, auto-refraction, OCT and tonometry. If this was combined with the ability of Dispensing Opticians to perform refraction, the ocular health assessment could be performed more efficiently than it is currently, utilising the skill sets of each registrant, to maximise patient care and efficiency.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The use of remote examination, or remote supervision, with tasks performed by ophthalmic technicians and signed off by a registrant would allow for greater flexibility for patients to be seen at a practice closer to them, reducing travel times and increasing appointment attendance. The delegation of refraction to an appropriately trained dispensing optician, would again allow the refraction to be completed before the optometrist assesses the patient's ocular health and signs off on the test. This would utilise time more effectively and allow patients to have more frequent refractions performed, with health checks performed more periodically, as usually determined by the optometrist

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refracting clients
Dispensing of children
Dispensing complex prescriptions
Providing contact lenses
Fitting contact lenses
Cosmetic contact lens supply

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction
Children's eye care
Children's dispensing
Complex dispensing
Contact lens prescribing
Cosmetic contact lens supply

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Unsure

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

All optical practices should be GOC registered to ensure best practice and adherence to highest professional stds

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Risk of further conveyor belt approach to patient care and creation of an even more disjointed patient experience

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Old fashioned description of purpose of eye test - needs modernising to reflect advances in the profession especially with regard to Pt Co-management in primary care

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The sight test is more than as described in the legislation now and this needs to be updated to reflect the purpose of the eye exam in the modern world and expectations thereof

Leaving as it is increase pressures in secondary care when optometrist have core skills which could be utilised more if the legislation was less prescriptive

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

No evidence but anecdotally a bad idea when peers asked

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage to protect the public

Disadvantage - easily flouted needs tightening

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

...

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

No - if tightened
Too loose at the moment
Easily flouted at potential risk to pts
Compliance poor

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Already flouted
Needs tightening
Pts don't undertake and often purchase lenses using their spec rx from online retailers who don't verify the rx leaving registrants to pick up the pieces
Novelty shops selling party-CLs don't even know there is a law relating to supply
Really needs stepping up for public safety

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Too vague
Not well publicised
Poor compliance

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Needs tightening up

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better awareness / enforcement of a clearer more concise law relating to this product would increase public safety

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Some online retailers are providing inferior quality products which if for instance are for driving potentially present a threat

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages to ensure pts attend for vision check at regular intervals

Disadvantage is this vision check only applies to appliance wearers abs should apply to all drivers too

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these.:

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these.:

Some Childress specs are being privies by online retailers - parents don't know or understand the legislation as it's not widely communicated

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Driving standards of vision and review

Prescribing of medications to support MECS and management of common ocular conditions - without IP qualification.

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Driving standards of vision and review

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

NHS sight test fee - practices charging less than the GOS fee should not be able to claim the full fee for NHS pts and their GOS remuneration should be capped at the value of their private eye test

Practices should be allowed to use the GOS fee as part-payment for eye examination rather than NHS / private split - this would help reduce the number of practices considering leaving the GOS

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Are the GOC seriously considering this? How an earth is this benefitting patients and patient care?

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Ophthalmoscopy, binocular vision, refraction and triage relating to giving advice on patients signs and symptoms. I wouldn't accept a receptionists advice over the Dr in my GP surgery, nor would I accept it at my dental surgery, nor my pharmacist so how can an unqualified individual be considered to be qualified enough to do ANY of the above safely? I find these proposals ridiculous.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

All of the above mentioned. Time needs to be allocated for face to face appointments, administrative duties and triage appointments within a set clinic similar to how a GP and Dental clinic is run.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Interpretation of pre and post tests including IOP's, OCT, visual fields etc. all results must go through the optometrist regardless of how experienced an optical assistant may be

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

All additional qualifications such as independent prescribing for example need to have the real ent accreditation. This is for patient safety first and foremost and making sure practitioners act within their skills and not beyond them.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Whilst they have the knowledge and understanding of how lenses and prescriptions work, they do not have the required qualifications and experience to carry this out. The question is, what's the benefit of giving this responsibility to a DO when the Optometrist would in 99% of cases do a better job. Why are you even considering this?

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The advantage would be cheaper Labour. The DO is cheaper than an optometrist. This is what it ultimately comes down to. There is no consideration to the patient, who in my opinion should be the priority for the GOC. If the general public were made aware of these considerations, I'm sure there would be outrage.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Incorrect prescriptions can cause falls, road traffic accidents, induce headaches, double vision and eye strain if incorrectly carried out. These symptoms would increase should changes be made and the perception of Optometry to the public would be further diminished.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Separating refraction from health checks has very little benefit. Very often the two are inherently linked. How would I know to look for a fixation disparity and potential prism in my refraction if I had not taken the history or performed a binocular assessment for example.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

From my own experience I refer 1/40 of my patients. I would assume for an experienced optometrist this would be similar, for an inexperienced optometrist this may be higher. If we improve optometrist skill set to manage more conditions, less would need to be referred. By giving more responsibilities to members who are less qualified means more pressure on secondary care.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I have giving just one example above why this shouldn't happen. If you want further examples please do contact me

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Fitting contact lenses itself isn't a difficult task. Managing on going habits and preventing infections is where the difficulties lay. This must always be done by qualified practitioners because early warning signs and poor habits are a pre cursor to potential sight loss. All the legal barriers are necessary to be in place and selling plano and coloured lenses by unqualified establishments must be clamped down upon

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See above please

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

Under 16's and complex prescriptions being over seen by a dispensing optician is more appropriate than being seen by an optometrist. There should be a law where one dispensing optician is present on the shop floor at all times. Please take pharmacies as an example. No sale of any 'P' or 'POM' must be made without a pharmacist on site. Why do we not enforce this rule as well?

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

The barriers are there for a reason. No sale of contact lenses without a valid health check and prescription. We are not handing out sweets. These are medical appliances and the rules must not be relaxed

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Yes. How could it not be?! If relaxing the rules comes into force we may as well make optometry completely retail like my local supermarket and scrap all the rules.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

The rules are there to protect the patients and the practitioners too

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As mentioned above, it moved the profession further into the 'retail' environment rather than 'medical'
In my opinion Optometry is already going in the wrong direction and it must stop now

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Upto date health check including front and back of eyes, upto date spectacle and contact lens prescriptions including fitting and comfort checks

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The unregulated sale of plano and coloured lenses should be made illegal and sanctions must be taken to any establishment in breach of these rules. As I have said before, contact lenses must be treated like prescribed medication and not a packet of [redacted]

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Please see above. Patient care is always best if lenses are fitted correctly and follow up health checks are carried out. Failure to do so will result in increased secondary care appointments to treat infections, corneal ulcers and bring optometry as a profession down further.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

100%. The GOC has a direct responsibility and must be held accountable to implications of any relaxations of the rules, especially if professionals like myself are strongly against it.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If stronger rules were enforced the fitting of contact lenses would be perceived as a skill performed by a qualified professional. The ability to get plano contact lenses from a shop or online without relevant check ups would make the contact lens side of things in optometry seem unnecessary and an inconvenience. Until of course, they need someone to see them for their infections.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Spectacles and optical appliances should only ever be obtained from an optometrist and/or dispensing optician.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Please see my previous answers

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

100%

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Two years in some cases is actually quite generous! I would not be adverse to seeing patients yearly

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If it's not dated the prescription could be 10 years old. Would anyone be happy with a driver driving round in a prescription 8 years out of date? The answer is no.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Visions standards would remain high. Safer for the public. It would be down right dangerous to change the two year rule to greater than two years

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There needs to be an understanding of features and benefits of a frame or appliance for the task they are performing. I doubt even the most educated parent would know what tint is best for tennis, what type of lens is best for impact. This is what you would go to a professional for

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Sale and supply should be done by a knowledgeable member of staff with a dispensing optician on sight incase of any complicated queries. This should be a most basic of care we offer

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Technology can greatly enhance optometry as a whole if used appropriately.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

If a triage is done before a booked appointment, this would enhance the face to face interaction. It may also give the patient an opportunity to seek secondary care immediately if deemed appropriate. The danger is we go down the current GP route where it is impossible to get a face to face apt. This must not happen

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I'm not sure on what the rules exactly are but I would like to see more remote consultations for history, symptoms and advice. I'm not at all keen on this extending to binocular vision, ophthalmology or refractions which must be done on site in my opinion

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

n/a

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Optometry needs to be more professional and medical and less retail. Sight tests timings must be standardised at a minimum of 30mins. Sight tests must never be free for non NHS patients. The business aspect of optometry is going the wrong way. The time with a profession must be valued appropriately. The mark up on spectacles and accessories can be reduced so that salaries can be higher. We must not have free eyetests that last 15mins with an optometrist not getting an appropriate lunch and working long hours for reduced pay.

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I have too many examples to fit onto such a small page I'm afraid!

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Personally I think it looks needs to be reviewed. Optometry is becoming the laughing stock of the medical world. A good optometrist is now considered someone who can make money for the business with little regard for patient time and safety. This I feel is criminal. The GOC need to stand up and act. There needs to be complete reform. There needs to be some responsibility taken from above for patient care and safety.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think the above non professional criteria is ok. It's the professional criteria I have issues with

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Disgusting that you are constantly devalueing our profession sitting in the pocket of [redacted]

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Everything i have spent 5 years of my life studying then the following 10 years in gaining cet/cod points

How can you allow someone without this degree to refract a patient? Unbelievable. Will they have the knowledge to know a myopic shift may indicate cataracts

A hyperopic shift may indicate macula issues?

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Everything. As it is now. Also you are happy with us doing the work of GPs with no protection! I have GPs asking me to diagnose strokes?!

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Stop trying to ruin my career. Nobody on your board should be associated with high street brands such as [redacted] to push their agendas

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

DO does not have the knowledge of everything that needs to be known. You are simply increasing optoms workload

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Leave it as it is

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

Health check and refraction goes hand in hand

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Leave it to the optom

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Lots of CL related issues

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

No

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No eye examination. Rx would be out of date - failure of visual standards. People driving when they shouldn't be

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See above

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Common sense

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes - a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

You need to physically examine a px to conclude an eye examination

Pxs are unreliable in their history

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

You are putting the public's health at risk. As an optom you are making my job harder as I will need to correct mistakes

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Stop. Now.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

You are a risk to the profession. The goc has done nothing to protect its registrants.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Talk to us. Email me.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Stop having [redacted] and co influence public safety

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The sale of spectacles and contact lenses. They shouldn't be allowed to be sold online.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

The fitting of glasses and ownership of businesses should only be allowed to those on the goc register. Skills are required to perform duties and they aren't taught properly to those who aren't qualified. This is my experience in almost every place I work.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

The only reason dispensing opticians being allowed to do this is to keep labour costs down. The skill to my job is identifying pathology as well. Dispensing opticians aren't trained to identify this.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The only reason to allow this is to get labour costs down. There is nothing positive to this move.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I work in Scotland. We have several levels of what we can claim as an eye exam. It works well.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The regulations should be tightened and the goc given power to prosecute those who sell lenses online illegally. In fact, online contact lens sales shouldn't be allowed. They are a medical device and should be treated as such.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

I'd they were changed to make it easier to obtain them, yes. If the registrations were tightened so those selling without an rx online could be fined then there would be less complications results from inappropriate lens use.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Making this less stringent would result in dad more complications.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

This must be tightened and those selling these devices without a prescription should be prosecuted.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It's too lax. There must be a deterrent to those who sell these items without an rx.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Online sales should be banned. I rarely see a pair of glasses ordered online that is a good fit or meets the correct measurements. People order them without the appropriate measurements.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Online sales should be banned. Most I see are inappropriate for the patient.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Online sales will take over and there will be more problems for those in practice to deal with.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Online sales shouldn't be allowed. There's little verification of whether a pair of glasses is appropriate for the patient. Incorrect measurements, poorly fitting frames etc.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Ban online sales.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction
Sale and supply of contact lenses
Sale and supply of spectacles for u16
Remote refraction
Contact lens fitting
Myopia management
Mecs/cues

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction
Sale and supply of contact lenses
Sale and supply of spectacles for u16
Contact lens fitting
Myopia management
Mecs/cues
Independent prescribing (those with qualification)

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Behavioural optometry

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Behavioural optometry/visual stress testing - I think it would be more reassuring if accredited. V easy to exploit patent concerns about dyslexia

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

So much of the refraction crossing back to the examination. For instance doing amsler if Nv reduced. Knowing what is likely to be expected if there is a corneal or retinal defect.

Definitely not in best interest of the px or the prescribing optometrist

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I'm sure it would be financially appealing to certain business models as a cost cutting measure, but the pxs are going to feel they are on a conveyor belt and it won't be clear who is ultimately responsible for their eye care.

It is less px focussed and more difficult to build a relationship with the px if only working on one part of the exam.

Optometrists are trained to understand the relationship between refraction and ocular health

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The refraction and ocular examination are intrinsically linked. The advantage of an optometrist continuing with both elements is the continuity of care regarding pathology and vision.

I suppose for businesses, if they could get patients/customers refracted independent of the ocular examination, it would be more lucrative. However, multiple pathologies risk being missed.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

protects the public from harm of buying without professional fitting and checks.

Already people are choosing what they want on offshore online sites. they might think one lens fits all, but I have seen some terribly poor fitting self-chosen lenses.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Those with prisms, myopia management lens pxs, Complex rxs - all need proper heights, centres, bvd measured.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage - correct appliances provided giving optimum visual performance

Disadvantage - costs to px vs online sales.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

None at all. Online sales without prescription are not chased by GOC, nor are Plano coloured/party contact lens sales.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Though a tightening would be great at protecting the public from harm

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Would just open up even more the possibility of pxs inputting the wrong rx or pick n mix style CL ordering

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

An assessment by Optometrist or Contact Lens Optician to verify the current contact lens specification, adjusting the fit and/or RX as required. Including assessment of the anterior eye for any contact lens related changes.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

However, the GOC do not act upon the sale of Plano contact lenses at all as far as I can see. It's a farce.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

If made easier, who would be giving advice on I&R, lens care, cleaning, do's and don'ts?

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Do not allow the sale of Plano contact lenses other than from registered optometrists/CLOs

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No follow up by GOC at all - farce

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

na

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

We have all seen pxs who have ordered varifocals online with terrible heights and can't use them.
Also pxs who have not typed the correct rx and ended up using a near/int rx for driving,

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

why bother getting an eye exam? An eye exam is far more than just a glasses prescription.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

protection of the public

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If plano, I don't see why they couldn't order the same as an optical practice, but for Rx lenses, it should be by registered person.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

protection of the public

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

keep as is

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Perhaps thinking about [redacted]

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I am incredibly concerned about the concept of remote refractions and their accuracy. The potential to miss pathologies, send customers (not pxs) out to drive or operate machinery in spectacles prescribed in this way is frightening.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

If they are doing it now, then the Act regulations need to be tightened to protect the public, and the profession as a whole

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

see above

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

not sure

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Supply of spectacles and contact lenses should be under supervision of a DO or Optom. Internet contact lens sales without prescription should've stopped. Internet sales of specs should be ready readers only. Prescription specs should be from registered practitioners only

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Companies supplying Eyecare, spectacle dispensing or contact lens supply should be doing this face to face. Staff who are not registered as DO or optom should work under supervision. Internet sales of contact lenses without prescription should be stopped

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

In Scotland, a designated optometrist inspects every practice every 3 years to ensure nhs standards are met. Any GOC inspection would be unlikely to have different findings and as such they should utilise their resources doing other things rather than duplicating the work of others.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Many patients view the refraction as the eye test. So a DO could refract a patient, and that patient could have a sight or life threatening eye condition that is not seen because the patient believed they had an eye test and didn't consult an optometrist. DOs could do optometry degree or conversion course if they wish to refract and just move to optometrist role.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Dispensing optometrists could potentially take jobs away from optoms as they would be paid less. Patient care would be compromised as no health checks. If DOs want to refract then they can retrain as an optometrist.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

DOs work alongside optometrists. They have colleagues standing next to them who can refract. They have no need to do it.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Legislation currently is robust. Eye tests in Scotland are free for all via NHS. Cheaper refraction only tests by DOs are not warranted and carries a high risk of patients believing they had a full eye health checkup when they didn't. This could lead to sight or life threatening pathology being found too late.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The GOC should do more to protect the public and it's registrants from internet supply of contact lenses where patient just picks a lens they want to buy without fitting or aftercare.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

The rules are flouted by internet sales. As such the barriers are walked over not prohibitive.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

Changes would be beneficial

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Prescription should be verified in writing. In my experience, this happens in practices. You can buy anything you like online without prescription. Every optometrist has stories of eye health problems relating to patients self prescribing lenses online and receiving no aftercare .

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

A minimum of annual aftercare to allow contact lens supply. This should include full history and symptoms. Assessment of anterior eye health and lens fitting. Review of cleaning, hygiene etc.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

No barriers. Legislation is completely ignored by non registrants who probably don't even know contact lenses are potentially harmful if not fitted correctly by a practitioner.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

The risk already exists and GOC don't do anything about it. Whilst I understand there is no influence over non registrants eg a high street clothes shop selling lenses, the GOC can tackle this problem through the lens manufacturers

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Risk of harm currently due to people self prescribing lenses. Zero powered lenses should meet the same legislation as a powered lens.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

The 2 year expiry exists to protect the public and encourage routine due tests.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The person would not have any eye health checks and potentially could be purchasing an incorrect prescription that no longer meets their needs. This could for example lead to a more rapid myopic shift if prescription isn't updated.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

2 year expiry protects the public from ignoring or not knowing they have eye health conditions.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Incorrect prescription being issued or incorrect fitting/optical centres could be detrimental to the child. DOs and optometrists are perfectly capable of prescribing sports goggles to correct requirements at a reasonable cost. I work in a practice where we regularly supply these to local football teams.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The current legislation is robust,

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Current legislation is robust

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

See below

7 What activities do you think must be restricted to our registrants?

Please provide details.:

See below

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Qualified suspension opticians should be trained to refract.

On the high street there is a massive shortage of Optometrists and as a result the public can not book eye exams.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes - with no restrictions

Please give your reasons and provide any evidence to support these.:

Massive shortage of Optometrists means the public are currently waiting unhealthy amounts of time to book appointments for new glasses. This is poor service and a danger to the public from our profession.

Surely our well trained Optometry colleagues would be better suited to looking at eye problems and referrals rather than a basic refraction?

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Positives

Refraction appointments would be more readily available to the public.

Optometrists could concentrate on seeing more eye problems from the time free'd up from refraction.

As a note I would argue every optometrist who argues against this does so with a financial motive. They will be worried they loose their jobs or receive pay cuts as they perform less 'commercially viable' jobs.

This however, is not an argument that helps out the public.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Low percentage of overall eye care, varies depending on clinics but approx 10-15% may have eye problems.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Contact lens opticians are allowed to refract with regards to contact lens prescriptions and currently do so successfully.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Na

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Na

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Is it safe and in the public interest to buy optical appliances from unqualified, unregulated people with no regard form the prescription- absolutely not. But it's the whole thing that's not in the public interest, not just the prescription

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Na

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Na

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]



3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

The profession and the public need greater protection from unregulated internet providers

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Dispensing out of date prescriptions

Dispensing multifocals

Dispensing high prescriptions

Dispensing out of date contact lens prescriptions and dispensing contact lenses without prescriptions

7 What activities do you think must be restricted to our registrants?

Please provide details.:

As much dispensing as possible

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

There needs to be better regulation than previously outlined. The internet has exploded since that review and community optometrists are left picking up the pieces of injury caused by contact lenses. We see people who have delayed a sight test after obtaining cheap replacement specs when they should have had a sight test leaving them with unknown pathology

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Public safety is a massive advantage of regulating business's better

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction shouldn't be a standalone function

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Patient care would suffer if the refraction is separated from the eye health examination

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It will keep the public safe as it has done for years

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

8-12% on average in my practice

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I have seen many patients wearing badly fitting lenses and the wrong Rx when purchased from the internet. Parents seem to be keen to buy lenses for their children with no professional guidance

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Patients with a recognised capacity issue

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

People get very confused when buying optical appliances and registered professionals are best placed to make sure they have the correct guidance

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

People like to change their own prescription with no guidance

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This never happens and we see the consequences often of poor fitting lenses and lenses being worn inappropriately

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

I've seen many corneal ulcers and serious abrasions from these lenses

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There is not enough protection from these lenses. It is never enforced

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

No

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

People use and or input prescriptions incorrectly themselves. They use old prescriptions and delay sight tests

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It's never checked or adhered to. Even if it is checked they'll dispense with one day left on the date

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

High street optometrists depend upon the sale of spectacles to support the clinical activities. The fact patients are actively encouraged to take their prescriptions elsewhere will cause a huge problem in the future.

We need proper payment for our clinical services from the nhs

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There is going to be a huge eyecare gap with people who can afford to pay privately and those who can't.

GOS does not work anymore

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Under 16's should be protected in all areas of dispensing

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The potential for lifelong permanent damage to a child's eyes by wearing the wrong Rx is not something that is appreciated by parents

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Nothing is currently enforced anyway

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

The current sale and supply is not enforced

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients would be safer

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Although the potential for harm from remote consultations is there. Differential diagnosis over the phone is very difficult even with video calls

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

No

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

No

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Online does not seem to be regulated at all. Patients can adjust their own prescriptions as they want

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Make them be GOC registered to sell appliances in the uk so they are as rigorous as we are about quality and accuracy. There is always the excuse "the supplier is registered outside the uk" I can't purchase medicine from outside the uk, that seems to be regulated well

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

We need the ability to penalise patients who book appointments then fail to attend. Either with an upfront deposit or a fine. We have a 20% no show rate despite calls, email and text reminders

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

We should be able to refuse to see a patient if they have been verbally abusive. The GOC don't protect practices from the public

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The reflection statements on CPD are a burden that is not needed

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Carrying out eye examinations including refractions. Refracting is actually very skilled and experience proves this.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Initial examination and CL teach under supervision.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Visual acuity and refracting is linked to eye health and pathology. Optometrists are best skilled to carry these out!

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Pathology would not be missed.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

A lot but as optometrists are highly skilled- they are also able to manage a lot of these in practice!

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Current model works well.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Wrong rx given to px!

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Prevent eye problems as pxs are. It adequately educated on risks/benefits!

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Na

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

They might not see as well as they should! Missed pathology!

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If didn't fit properly- wd get eye strain

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

NA

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

I'll fitting glasses are a huge problem. If bought online they usually are.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

NA

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction
Ophthalmoscope
Funded examination

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Symptoms and history
Refraction
Ophthalmoscopy
Slitlamp examination

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

No patchily will be taken into account during refraction

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

2/20 patients referred

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Inaccuracy

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Can be harmful

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Inaccuracy

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Inaccuracy, pathology missed, if driving standard not met!

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Xxx

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Inaccurate measurements

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Should be restricted

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Minimum eye test time should be implemented!!

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Patients' Refraction and ocular health examination

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The full sight test and all its contents

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Years of clinical training to understand the clinical decisions made during refraction

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Same reason as mentioned regarding refraction

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Negligence to patient care. Missed health checks

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Remote sight tests poorly regulated. Lose patient interaction and may miss vital details

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

[redacted]

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Unsupervised sale of contact lenses and glasses online, the patients always come in complaining with problems

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction

Binocular tests, prescribing prisms

Testing children

Testing vulnerable adults

Eye health check includes: slit lamp, and direct and indirect ophthalmoscopy and interpretation of fund is photos

Dispensing high prescriptions

Dispensing children

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction

Binocular tests, prescribing prisms

Testing children

Testing vulnerable adults

Eye health check includes: slit lamp, and direct and indirect ophthalmoscopy and interpretation of fund is photos

Dispensing high prescriptions

Dispensing children

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Patient safety will be comprised as they will not be able to distinguish whether their eye health has been checked or whether they have just had a refraction. The elderly in particular may not seek medical help if they think they were seen last week - when in actuality they saw DO and not an OO. How will a DO determine the need for prism if no cover test has been done. What if diplopia patients are corrected with prism when actually they needed a referral for nerve palsy. What about dense nuclear cataract Patients that need referral for cataract extraction rather than new glasses, then by the time

they are eventually seen the cataract is too dense and causes surgery problems. What about managing the expectations of patients who think their new glasses will give them clear vision but they have not been told about their cataract/amd/erm/dry eye and their expectations managed. What about children who control their exophoria by accommodative convergence who are then prescribed glasses for hypermetropia by a DO.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It prevents the following scenarios: patients not seeking an eye test because they believe their eye health has been checked when actually they have just had a refraction. The elderly in particular may not seek medical help if they think they were seen last week - when in actuality they saw DO and not an OO. How will a DO determine the need for prism if no cover test has been done. What if diplopia patients are corrected with prism when actually they needed a referral for nerve palsy. What about dense nuclear cataract Patients that need referral for cataract extraction rather than new glasses, then by the time they are eventually seen the cataract is too dense and causes surgery problems. What about managing the expectations of patients who think their new glasses will give them clear vision but they have not been told about their cataract/amd/erm/dry eye and their expectations managed. What about children who control their exophoria by accommodative convergence who are then prescribed glasses for hypermetropia by a DO.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I see roughly 16 patients a day and probably average a referral a day.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

There are countless online readers selling contact lenses without prosecution.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Microbial Keratitis does not distinguish between Plano or powered lenses

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Microbial Keratitis does not distinguish between Plano or powered lenses

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

You can still dispense in the patients best interest

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

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39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

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6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Europe and the company [redacted] do remote eye tests
dj

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

I think there should be an additional objective to ensure that internet / technology based optometry is not allowed to continue in the current format with no regulation. This poses a risk to the public.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

I believe the current set up is acceptable where non registrants may assist with the provision of eyecare but must be under the supervision of a registrant.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The sale of spectacles and contact lenses online. There are very little checks on specifications and patients self prescribing is a huge risk to public health.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Yes - The sale and supply of all spectacles and contact lenses.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

I believe there could be scope for dispensing opticians to obtain a refraction qualification so long as a registered optometrist completes the eye examination with an internal check of the eye.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

Any business that supplies spectacles or contact lenses should be required by law to register with the GOC, including online businesses, to remove the risk to the public from unregistered persons.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

All suppliers should be required by law to register, protecting the public by ensuring consistent standards.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Absolutely, the aim of inspections should be to help and support but also to ensure that standards are maintained.

I am very surprised that inspections are not performed.

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

I believe the pharmacy model is a good starting point and a similar set up in optometry may be beneficial.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes - under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

Perhaps with an additional qualification in refraction they could refract the patient and the optometrist can review this, perform the internal examination and complete the eye examination.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It would offer career progression to dispensing opticians.

There would be a financial benefit that an optometrist would be able to perform more eye examinations, this would also help the public in areas where demand outweighs supply.

This would also free optometrists to provide additional services such as MECS, glaucoma management etc.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I believe that an internal examination is an essential part of an eye examination. If a patient has reduced visual acuity, how else would you know if it is due to a poor refraction or underlying pathology? I also think that both parts of the exam should be completed at the same time.

Separating the internal and external components I believe would lead to sub par refraction only examinations that would not detect underlying eye conditions and would pose a huge risk to public health.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The main advantage is that the examinations are thorough and early detection of any pathology will have a positive impact on prognosis.

I believe the public are used to the current set up and most people can access good quality healthcare either privately or via GOS.

I cannot see any negative impact from the current system continuing.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

I would not be able to give an exact number. There are many variables, if you work in a city centre practice with a young customer database there will be less than if you have an older patient database.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Not specifically but I have heard of examples of other practices that have performed refraction and planned to complete the internal examination at a later date which has not happened and pathology has been missed.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

No, in fact I believe that the fitting and supply of contact lenses requires more regulation.

I know many hospital ophthalmologists are worried about the complications they see from patients wearing unsuitable lenses.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The main positive is the reduction of risk to the public as the patient will be wearing an appropriate lens and will have had the specifics about wearing times, hygiene etc. explained to them.

Financially, competition has driven the cost of lenses downwards and I believe they are affordable to most people. There is also the option to use GOS vouchers towards contact lenses.

The disadvantage is that it can scare patients into simply ordering lenses online which creates a risk to the public as they may be the incorrect prescription or poorly fitting,

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

U16 patients especially, making a mistake in the plastic period could cause reduced vision for the rest of a child's life.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The positive is the direct involvement of a registrant should reduce the risk of harm occurring to these patients.

I don't see any negatives as GOS will cover the cost of most spectacles so everyone should be able to access eyecare within their budget.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Patients should be able to order contact lenses using an in date, signed specification issued by a registrant.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

If the requirements are relaxed too much then I can foresee issues where patients do not have regular aftercare. Errors could be made in the power of the lenses as well as with asthology being missed. With contact lens wear it is important to intervene at the earliest signs of pathology.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Although this was relaxed during COVID, I don't think that in the long term this would be good for patients.

Some online sellers perform very little verification currently, this needs to be addressed.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantage to the patient of no verification would be a quicker transaction, however the advantage of the verification would be a lesser risk of an error occurring.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Yes I do, anyone that supplies contact lenses to a customer should be accountable for their aftercare and detecting any early pathology.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It is important to protect the public from harm when buying these products.

To the previous question, the seller should be accountable for their aftercare.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

We could see a huge spike in contact lens related emergencies from poorly fitting lenses and poorly educated patients.

This would create additional workload for the already struggling hospital service.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Stronger legislation is needed to prevent the sale of a medical appliance with no follow up.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The negative is that it is confusing, many people don't understand the risks of cosmetic contact lenses.

The positive would be that we minimise the risk to patients.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think that the fact the GOC cannot regulate illegal online supply is creating an uneven playing field for both customers and businesses.

Customers are buying spectacles online which can potentially be poorly fitting and may not meet current British standards. This could cause a significant risk to the patient and the public (for example if the patient crashed their car and was found to have poor eyesight due to ill fitting varifocals).

I believe that more regulation is required and the onus should not be put on the consumer.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

There would be risks of poorly fitting spectacles, induced prismatic effect from incorrectly measured spectacles causing binocular vision issues, risk to the public from patients potentially having poor vision due to poorly fitting spectacles or them not meeting British standards.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

There needs to be regulation of standards to ensure patients are buying products that are fit for purpose and correct their vision accordingly.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

The recall placed by the optometrist needs to be respected, there is a reason why that recall has been chosen.

Many patients have changes in their prescription after 2 years. The examination is also an opportunity to detect and manage eye disease.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financially patients would be able to order spectacles without having an eye exam.

The disadvantage would be that the prescription has not been checked for accuracy and the patient by missing out on the eye examination may have undetected pathology, Significant eye conditions such as glaucoma are asymptomatic in the early stages but if left undiagnosed would have a massive impact on the patient's vision.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantage is that the prescription will be accurate and the patient will have had a full eye examination that could detect pathology.

Financially patients may be disadvantaged as they need to pay for an examination but GOS should help everyone to access eyecare within their budget.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Children have rapidly developing eyesight and making errors in prescriptions could have long term consequences.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The ensuring that the prescription is suitable for the child in question.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unsure

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I believe technology can aid us to provide better care for everyone, especially those that struggle to access mainstream optometry.

It should still be overseen by a registrant.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think it could improve accuracy, capacity and aid the early detection of pathology.

Self prescribing should be avoided, an optometrist should still be consulted through the process.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I believe we should explore technology but with caution to ensure public safety.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

I think the GOC needs to be clear how we can use new technology to improve patient care, not to cut corners and make more profit.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

By ensuring that all providers of optical appliances are registered and regulated by the GOC, including internet providers.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Student optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

Absolutely. There is pressing case for optometry to be reshaped. Across the NHS, large reform are taking place and I am excited that the GOC has stepped up to allow optometrist/others to take the wheel and determine our future.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Referrals to hospital/specialist

Seeing children under the ages of 16.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Seeing children under the ages of 16.

Making referrals to hospitals/GPs/specialist

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should not be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The optometry workforce has transformed and with technology, that transformation is likely to grow. I think it's time the GOCs rule regarding what non registrants can't do changes too.

Registrants and non registrants should perform the same activities expect where children are concerned due to safeguarding.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

I think there is merit to allowing a variability in bodies (that is non-GOC) that regulator post qualification. This will allow more varied skills in the workforce that can respond to challenges. It will also allow students from remote and isolated regions of the county to find a training provider closer to home so that they can fill any gaps in the work force locally.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

business inspections will boost confidence in the profession among the general public and protect staff that are afraid to speak up against unsafe conditions.

It will also allow the GOC to generate a new source of income so that perhaps they can lower the membership fee for registrants

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

business inspections will boost confidence in the profession among the general public and protect staff that are afraid to speak up against unsafe conditions.

It will also make whistleblowing easier

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

I strongly agree with this point. Our roles overlap already and dispensing opticians have great anatomical knowledge of the eye and are already skilled in lens selection.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It would allow eye test services to be more widely available across the UK. It will bring dispensing opticians and optometrist closer in the professional and overall increase skill share and confidence from the general public.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages including a shrinking workforce that can't accommodate sight testing for the whole of Britain. Some regions don't have optometrist but plenty of dispensing opticians- these regions will continue to miss out on optical services.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

SUPPORT: Every 6 minutes someone is told they're going blind. Separating sight test and health check will ensure there is more health related service for eye disease. Most eye tests are routine and simple so separating the two will hopefully reduced demand on health related eye check up need

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Children should be seen by optometrist ONLY

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safety
Professional that comes with GOC code of conduct
Less risk

This all assumes a registered optometrist perform this

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

No supervision should be required

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Px might need it urgently
It gives too much power to one supplier.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Yes

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Less risk to the public because more companies can sell glasses rather than one company having a monopoly and inflating costs

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

The GOC code of conduct protects consumers. Companies should be registered to it too, therefore removing the need for the the sale of optician appliances ACT

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

Most people's prescriptions does not change.

Not everyone can afford a two yearly eye test cost, can be absolutely unnecessary if your prescription hasn't changed

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This is the current normal practise in East Africa where I'm from and first become interested in optics.

It will allow consumers more purchasing power. It will allow some rural remote parts of the UK to have access to optical appliances readily.

I think allowing non registrants to sell glasses without a valid prescription will align the UK optometric practise with our global partners and neighbours. It will also remove unnecessary bureaucracy. It will also give the optical workforce a better image in the UKs mind and create a positive hassle free perception for us.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage: many rural parts of the UK don't have access to optical services and will continue to be left behind.

Too much bureaucracy can leave a negative mind in the consumers mind and the general public's view of optics .

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not advantage . Risk of abusing powers by non registered people with no code to stick to

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Allow kids to access glasses with safety

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Makes services more easily accessible

Ophthalmologist already use remote care

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Remove the requirements that the completion of Stage 1 certificate expires. After students graduate, students should be able to take up to at least a 5 year gap between completing their degree and completing the scheme of registration.

Life

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Selling contact lenses. Supplying spectacles to ANYONE. Selling 'tinted lenses for driving at night', which are legally too dark for driving at night!

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Selling contact lenses. Supplying spectacles to ANYONE. Selling 'tinted lenses for driving at night', which are legally too dark for driving at night!

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Supplying spectacles for under 18s.
Tinted lenses for Visual Stress.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

I think it would be wise to stop 'refraction assistants' performing 'eye tests' and the only way to stop it is to increase the GOS ST fee and legislate to prevent it.

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

The current model doesn't seem to promote the interests of NQ optometrists working for the 'high street', who may be too concerned to raise their concerns about business practice. Whistleblowing is still a traumatic experience.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

I think DOs refracting under supervision would be a far better system than unqualified 'refractioners' who currently do it under supervision in the high street.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantages would be increased efficiency with regard to clinics.
Disadvantages would be risking de-skilling optometrists who rarely refract.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I think if there is reform, calling an Eye Examination an Eye Examination, rather than a 'Sight Test', makes it more comprehensive. The language used is incredibly important when describing what something actually is. Technically a 'sight test', by definition (outside of the Optician's Act) is literally measuring someone's sight.

The current problem with legislation is mostly due to [redacted] and their interpretation of what needs to be done. The latest [redacted] looks like it was written by [redacted] not by the [redacted] Uni legislative reform, with an increase in political and public awareness of the importance of optometry, and an appropriate increase in NHS remuneration (including for myopia management), there will be massive problems in the near future.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The problem is with NHS remuneration. A modern comprehensive eye examination to determine prescription and ocular health, should include diagnostic tests which cost considerably more than the NHS is prepared to pay. There is also a considerable gap between the ethics of myopia management and the reality of what occurs, due to the lack of funding from the government.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

Personally, as an optometrist, I manage as many things in primary care as I possibly can.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

From my experience the general public, because of poor awareness of ocular health, would leave their eye problems until they were really bad, increasing medium and long-term complications and causing increased costs to society in the long run.

Ophthalmology departments in hospital are usually the second busiest departments partly because of the incidental findings from routine eye examinations, which shows there are a lot of eye health problems around!

I think separating the GOS sight test from eye health checks, such as glaucoma assessments, as is done in Scotland, with appropriate remuneration, would be a good idea.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The biggest barrier to public safety is the GOC not clamping down on unregistered supply of contact lenses.

I know of parents who buy their highly myopic children contact lenses online by 'making up' the prescription, because there are not enough built-in safety checks.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The biggest barrier to the health of the general public is the GOC not currently pursuing unregistered suppliers!

The second biggest barrier is online sellers not requesting a copy of a valid prescription.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Drivers.

Ideally everyone.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The cost of restricting supply to drivers would be mostly borne by the general public at the point of sale. There would probably be 8% less traffic accidents as well!

The cost to society if sale and supply were restricted to everyone would be diminished, because a general public who have up to date spectacles would be more efficient at day to day life. There would be less sick days from headaches and migraines for example. This would probably be a big shift towards national universal NHS eye examinations. Although an initial big outlay, it would save money and certainly improve outcomes in the future.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

There are not enough barriers in place for people to purchase contact lenses online. I know of parents who 'make up' prescriptions for their myopic children, and order them online very successfully, with no regard to aftercare!

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Not if they got stricter.

I feel having a tick box online to say 'the prescription is valid' is not an adequate safeguard for checking aftercare measurements are in place.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

I feel it has been many years since anyone has requested a contact lens specification to be verified. I imagine no one bothers anymore, due to the GOC being inefficient at regulating unregistered sellers!

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I don't think anyone bothers to verify prescriptions anymore as it has been many years since anyone has requested a contact lens specification to be verified. I imagine no one bothers anymore, due to the GOC being inefficient at regulating unregistered sellers!

I think it would be very simple for remote sellers to be able to request a copy of a valid prescription as part of the ordering process. I feel that there should be legislation to improve the GOCs power to pursue non-registered sellers.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

A check of contact lens prescription and the health of the anterior eye for adverse effects of contact lenses at a minimum of 2 years frequency for infrequent contact lens wearers and annually for regular contact lens wearers.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It is still too easy to purchase zero powered contact lenses, due to the GOC not having any (financial?) interest in pursuing unregistered sellers.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

I hear tales of people sharing contact lenses bought online. I feel there needs to be tighter regulation of all contact lens selling!

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Legislation needs to improve the GOCs power, as much as anything!

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I think the risk is quite low, but still significant, of adverse effects from contact lens wear, as guidance of supply is not enforceable.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

There is a slight barrier to new developments if all optical appliances are regulated. I do not feel that it is significant enough to deregulate to whole market!

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

There would be a risk that prescriptions were incorrect, headaches would abound, glasses would be ill-fitting. Myopia would increase more dramatically (how many online sellers have done CPD in myopia management?!)

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

It should probably be extended to under 18s, due to the increased screen time and risk of myopia increasing.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Registered opticians can supply outside of two years, if it is required. There needs to be a time limit and two years is an appropriate one.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The risk to productivity, and driving are the biggest ones. There is always a risk of underlying eye disease and general health disease not being picked up at routine eye examinations.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I think staying as it is would be an acceptable option.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Deregulating would be slightly cheaper for the end user, because non-opticians DO NOT HAVE TO CROSS SUBSIDISE THE NHS!
I'm not sure it should be just about cost, though. A poorly fitting sports appliance could cause more injury than it is designed to protect from.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not many.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

I think the GOC need to look at myopia management seriously and not bury their head in the sand like [redacted] want them to!

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not a whole lot.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Digital imaging is becoming more commonplace. I think there is a view that an OCT is better than ophthalmoscopy. Which it is, but only for the central retina.

An optomap image is probably better than dilated ophthalmoscopy - it depends who you ask. I would argue that dilation is unnecessary in most people if they've had an optomap.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes - a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Digital imaging makes second opinions a lot easier to obtain.

Remote care can increase the risk as a lot of optometry entails physically examining the anterior chamber.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The vagueness of the current Act, and woeful underfunding of the NHS ST does preclude most people, especially those entitled to NHS funded tests, to state of the art examinations in the 21st century.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

There doesn't appear to be a minimum requirement for remote testing, or indeed a significant amount of guidance on remote care.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Mostly by either increasing the NHS ST fee, or allowing us to charge patients for the use of state of the art technology!

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

GOC policy appears to be let unregistered sellers do as they please! I think legislating to give the GOC more power to regulate unregistered sellers would be appropriate.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

I think legislating to give the GOC more power to regulate unregistered sellers would be appropriate.

I think having unregistered sellers having to keep records of appliances sold, along with copies of valid prescriptions for appliances sold, would either put them off selling, or improve standards.

I feel a lot of issues are international (including the tax collected on sales), which could be legislated for. The GOC could maybe even lead the way forward with regard to legislating for taxes paid and laws applied where products end up, rather than point of origin!

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Either universal NHS funded eye care, with improving remuneration; or just improving remuneration!

Myopia management is an area which needs more promotion.

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Supervision of unregistered people performing registered roles: the 'refractioner'. When there are six refractioners supervised by one optometrist then the world is a poorer place.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

DOs should get a grant for CET.
Also they should get more recognition.

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Supply of contact lenses

Supply of High powered spectacles above +/- 5D

Supply of Varifocals or bifocals

Supply to children (CL or Spectacles)

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Supply of contact lenses

Supply of High powered spectacles above +/- 5D

Supply of Varifocals or bifocals

Supply to children (CL or Spectacles)

Examination

Contact Lens Aftercare

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Why are you asking the same question multiple times?

Supply of contact lenses

Supply of High powered spectacles above +/- 5D

Supply of Varifocals or bifocals

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

MECS

Myopia Progression Lenses (CL and Spectales)

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

All businesses should be required to register.

The fact it is voluntary means it is a farce.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

The concept of present needs to be defined particularly in the culture of work from home.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

With an appropriate qualification, many would help in the role of completing an examination and while the GOS fee is ridiculous and does not reflect the optometric qualification

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The examination fee is unsustainable in the modern world and has always been supplemented by products. This is an unhealthy situation that has led to overprescribing, incorrect prescribing and high product margins allowing internet suppliers to undercut the professional and ultimately make the profession unstable and unsustainable.

How can a practice keep pace with new technology on £22?

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The status quo isn't working.

I see many MECS related appointments that would have previously been resolved at a CL aftercare. As many patients are avoiding these, vision is being put at risk by unregulated CL supply.

The GOC and [redacted] have done very little to raising awareness of this with the public and many patients now believe them to be unnecessary.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Incorrect supply of optical appliances disproportionately affect these groups.

Unregulated CL supply to under 16s is a form of Child Abuse by definition.

Our profession has done little to recognise this as a problem.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

But but it is not working because you do not require companies to register. You do not promote good CL wear with the public and it is your role to protect the ocular health of the nation.

Creating a buy from Registered CL Sellers would help.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Ocular health is already suffering and other resources ie A&E MECS services are picking up the pieces.

I regularly see infection and inflammation relating to CL wear of patients who have not had aftercare check ups at all or recently. Some have not been seen for 10 years.

As regulator you are failing all of these patients.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

It is largely ignored by the online CL retailers.

Many patients just order the power of their spectacles and swap lens types at a whim.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The fact you have included this question fills me with fear.

Tighten the legislation, not loosen it.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Fit

Suitability

Wearing schedule

Surface health

Visual acuity

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Every Halloween, we see the result of no checks on eyes and "Party" shops and online retailers not checking current regulations.

This endangers ocular health and further shows how ineffective current rules are.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

see prev entries

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Of course.

How many eyes need to be impaired before you will act.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is failing so why not change

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think your question is poorly worded

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

All of the previous answered points

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

If we didn't need legislation, we do not need a regulator and the eye health of the public would deteriorate further.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It at least gets across the need for regular eye health checks.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I find it hard to believe again that you the regulator is even thinking this.

Ocular health in the UK has been in decline relative to other western/European countries because of poor supply and regulation.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If you wish to continue to fail people - stay the same.

Prescription from unregistered sellers continue to be supplied incorrectly and not fit for purpose.

Besides consumer law, the Opticians Act does not prevent it as it stands. Consumer law, just means it is not a financial burden to patients.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Current regulations do.

Sportswear is only worn for a short period of time and should have some regulation, but should be more open.

As a Rugby Coach I would like to see more children enter sports as it is good for their health and team building skills that ultimately benefit our society. Having affordable appropriate eyewear for sports helps achieve these ideas.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I do believe the supply should be regulated, but this could be a clinical decision based on a spectacle prescription. For instance a pair of swimming goggles that do not correct small astigmatisms is hardly a public health issue and a suitably qualified practitioner should be able to take a written RX and turn that into something to help a child in a sport.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See prev entries

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Prescription Spectacle Supply

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As prev - it is not currently working for patients or the profession.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

MECS provision to Px during the pandemic

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Quicker access to experts and more local provision of care.

Many opinions of health are currently on the basis of scans or printouts from machines carried out by trained staff.

The interpretation of the results is the most important aspect here

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Correct training as seen in Diabetic Fundus Screening
As strong professional input that has the practitioner interpreting the results as responsible.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

NA

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

You can not enforce it.
How many prosecutions have the GOC made?
How many have been made public?

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Registration of all optical business/sites.
GOC advising the public to look only for registered suppliers

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

.co.uk is UK based, so subject to UK regulations

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

non registrants should be prevented from selling spectacles, performing eye examination or "sight tests" and selling contact lenses - prescription and cosmetic contact lenses.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

I feel that an optometrist - and that is the correct work not optician - should not be allowed to work for a corporation directly and only be able to be employed by an optometrist or ophthalmologist or hospital. That is the case in many USA states and protects the optometrist and the public. The state of optometry in this country has been turned into an assembly line and hard sell. The public is being examined by optometrist employed by corporations who are pressuring optometrists to tell patients they need new glasses or updated glasses. Corporations that do not even give their optometrist adequate breaks. Corporations that actively encourage optometrists to not do additional testing such as visual field testing so that the patient does not worry about eye health and buys glasses that day. I speak from experience of all these things happening to optometrists.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

no

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

USA qualified and educated optometrists should be allowed to be accredited as an independent prescribing optometrist here in the UK. The education in the USA requires all optometrists to receive therapeutic qualifications to practice optometry. Instead, USA optometrist are having to do an IP course then hope they get a placement with hospital in order to meet requirements to take the IP exam.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I do hope that no pressure from corporations like [redacted] is influencing bodies like the GOC to allow dispensing opticians to do refractions so that they can do even more eye exams in one day for

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

I do know that after practicing here for the last 10 years, patient referrals are too complicated time consuming and involve too many hoops to jump through before they get the care they need. Why optometrist are not allowed to refer directly to ophthalmology in my area is a mystery to me. Optometrists should be the primary eye care providers and ophthalmology should be treading more complicated cases and in theatre. The pathway to IP in the UK discourages many optometrists from pursuing it. We are working with our hand behind our backs, knowing what treatment is needed but unable to provide it. Instead we have to write to the GP who hopefully refers to ophthalmology. Then ophthalmology will write a report letter back to the GP and not the original referring optometrist.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Refraction is based on the health of the eyes. Conditions like cataracts and corneal disease and degeneration impact patient's refraction. You can not just do a refraction. Much like you can just have a "quick look" at the eyes. This is based on working as an optometrist since 2003 in both the USA and the UK. A refraction alone on a patient I saw yesterday would have missed a large rhegmatogenous retinal detachment and that patient would have eventually lost sight which may not have been able to be saved with surgical treatment.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

the sale and supply should be done only by qualified dispensing opticians and optometrists.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

I am not sure how to answer this questions. Anyone can buy contact lenses online and do without any prescription and prescribing themselves. The online companies selling contact lenses to patients should at least contact the optometrist who signed the prescription to see if the prescription is accurate and valid. I can not tell you how many times I have seen patients wearing self prescribed [redacted] contacts lenses with advanced corneal neovascularisation.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

see my above answer. Corneal neovascularisation is seen often in my patients who are buying contact lenses online without a valid prescription.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

no barrier. anyone can buy contacts online without a prescription and the company selling the lenses don't suffer any consequences for risking patient's eye and corneal health.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See the above. I the job of the General Optical Council is to protect the public, the restricting the sell of contacts to only those who are qualified and making sure the prescription is verified with each sale is needed.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

A contact lens prescription should be only for a maximum of 1 year in order to make sure the patient's ocular health is not being affected from contact lens wear and to make sure the patient has the best vision possible with contact lens use.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

again not sure how to answer this as many places both online and in store sell zero contact lenses without any optometrist or contact lens optician on staff. These places don't suffer any consequences for doing so.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Obviously not teaching patient the correct insertion and removal could mean the patient could injure their eyes. Zero power contact lenses made of poor material risks the health and integrity of the cornea.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

But also to follow through with penalising and prosecuting those unqualified selling contacts lenses without prescriptions to the general public.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Having a patient return every year for a contact lens aftercare of course increases the profits for the optical practice. But more importantly, required annual appointments protects the public's ocular health and remind them of the importance of taking care of their vision.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Again like contacts, people can buy glasses online without a valid prescription by taking their own pd and typing in their own prescription. Poorly fitted glasses and incorrect prescriptions may not directly impact the ocular health but could affect the patient's ability to see well to drive a car. Poor vision could cause mobility issues as well.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

See above

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

see above

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

it is necessary. I would argue that patients should be seen every year for an eye exam.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Leaving it too long between eye exams allows undetected issues like glaucoma to progress and risking they vision of the patients.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Having eye exams required every 2 years or 1 year of course increased the profits of the optical practice. But also it keeps to detect eye health condition in patients allowing optometrists to better assist our patients in keeping their ocular health and vision the best possible.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

again one can buy these types of things online without prescriptions

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

giving an under 16 the incorrect material in sports eyewear could mean that when shattered the lens could injure the eyes.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

There should be a minimal requirement list needed for remote or virtual consultations for optometrists. Having an official list of tests needed would protect the patient and the practitioner.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

During lockdown 1, remote consultation allowed me to get 4 people to hospital with wet AMD that was not able to be diagnosed any other way due to restrictions.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Again setting a minimal lists of tests and data to gather would protect the public and the practitioner in case of any legal dispute later.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Maybe consider calling it the Optometry Act instead of Opticians Act in order to distinguish optometry as primary eye care providers and distinguish us from dispensing opticians who are opticians.

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Same as before: Children, complex Rxs, contact lenses, refraction....

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Same rules as before

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Sale of plano contact lenses as these carry exactly the same health risk as prescription ones

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Laser surgery is performed by USA Optometrists & I don't see why this can't be happening in the UK

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

There are no shortages of Optometrists and refraction along with the skills of ophthalmic diseases that Optometrists possess make them without exception the right candidates for performing these tasks and if you remove this then patients will be subjected to great risks

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

As mentioned above, but the advantages would be for larger companies to make more money

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I was a dispensing Optician & contact lens Optician myself before I became an Optometrist and I can tell you that the knowledge that Optometrists have is no where near what you study in dispensing or contact lenses, so the legislation is accurate & does work in protecting the public so why change it!?

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As above

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

You can obtain this from secondary care, I'm sure they will be able to share this with the GOC

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

As mentioned previously

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As mentioned previously

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Mentioned previously

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Mentioned previously

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

The system works and does protect patients

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Mentioned previously

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Patient safety

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients safety

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Performing specific tests that can help patients continue to wear their contact lenses safely

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

As B4

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Carries sane risk as prescription lenses

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

As mentioned previously

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient safety

Increase/ decrease in sales

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Xx

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Xx

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

As mentioned previously

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Cx

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Xx

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Mentioned previously

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

As long as they are non Rx

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safety
Financial

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Mentioned previously

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

Xx

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Mentioned previously

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

We performed some telephone consultations during the pandemic

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Not seeing the Px face to face can easily lead to wrong diagnosis & advice

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Xx

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Xx

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Xx

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Xx

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Xx

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Xx

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Xx

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Xx

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Dispensing to children and registered partially sighted and severe vision impaired ie as now.
Also possibly dispensing to "complex" patients.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

sight testing
fitting/ dispensing of contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

nothing specific

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

MECS schemes require local accreditation so perhaps that should be GOC recorded

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

I cant see how this would be to the benefit of the patient.

The proposal would benefit the larger optical companies as it would allow the churning out of new spectacle prescriptions without taking into account any pathology present.

Why not just use an autorefractor?

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I cant see how this would be to the benefit of the patient.

The proposal would benefit the larger optical companies as it would allow the churning out of new spectacle prescriptions without taking into account any pathology present.

Why not just use an autorefractor?

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The system has worked and allows sight testing and eye examinations to be conducted in the same visit. Local schemes for shared care allow further refinements as required.eg Glaucoma referral refinement and cataract schemes as just two examples

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The current system is in place to protect the public.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

Possibly LVA/ complex prescriptions?

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

paracetamol can be bought in a supermarket and it is possibly more likely to cause harm if taken incorrectly than an incorrect contact lens can cause.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

A standard list of checks required to complete an aftercare visit

va, wearing time type of modality solutions used compliance check fit staining external eye examination eversion of lids ac check etc

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

non registrants wouldn't have the necessary knowledge to decide if a supply was appropriate or not

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no advantages

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no disadvantage

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

status quo is fine

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

as shown during covid remote provision of emergency eyecare/mecs worked well via telephone and video /photo calls

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

possibly the ability of an "app" for a smart phone being able to give a "diagnoses" from a few questions and AI interpretation of images could lead to problems on missed conditions

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

the results of remote technology need to be signed off by a registrant

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

[redacted]

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

contact lens fitting
refraction
eye examination
dispensing to under 16

7 What activities do you think must be restricted to our registrants?

Please provide details.:

none

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

none

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

allowing remote prescribing of spectacles
Advanced new refraction and eye examination equipment

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

optometrist to be allowed to sign a prescription remotely under their supervision

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

if remote eye examinations are to proceed this probably necessary for patient safety

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

don't know enough about others

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

refraction and eye examination should be split into 2 functions

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

far easier for patients and dispensing opticians have the ability/skill to ensure patients have regular eye exams. would also allow optometrist if they wish to become more clinical rather than just churning out spectacle prescriptions

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

would work well if dispensing opticians could refract and issue a prescription

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

far greater choice for patients

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

a guess would be less than 5%

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

works perfectly well in other countries

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

patients need to be fitted by suitably qualified opticians for safety

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

works perfectly well as it is

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

under 16 for safe guarding and risk of causing future damage/problems for someone under the age of consent

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

consent issues

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

the rules are already being broken

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

am not aware of any past issues with existing rules being ignored

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

already ignored

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

make no difference as already ignored

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

already ignored

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

already ignored

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

already ignored

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

No

Please give your reasons and provide any evidence to support these.:

already ignored

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

none

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

works well already

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

none

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

works well already

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

patients can make their own judgement

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

make no difference if patients get a reminder to have eye exam from an optician. it is their choice to ignore if they want

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

increase spectacle sales and choice to clients and bring us into line with other countries

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

consent still required

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

safety of under age people

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

none, works well as is

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

remove 2 year barrier

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

increase patient choice

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

advanced AI eye examination equipment more thorough and precise than average eye exam. Used in other countries perfectly well

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

increase patient choice+ reduces time spent close to an optician

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

dispensing and contact lens opticians have the skills to interpret results

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

should allow any registered optician to sign off from equipment they deem fit for purpose

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

allow any registered optician rather than just optometrist

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

works as is

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

none

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

not sure

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

not sure

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

not sure

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

none

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction
Eye examination
Contact lens fitting and aftercare
Contact lens sales
Spectacle sales to vulnerable groups
Supervising trainee registrants
Controlling registrant professional activities

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction
Eye examination
Contact lens fitting and aftercare
Contact lens sales
Spectacle sales to vulnerable groups
Supervising trainee registrants
Controlling registrant professional activities

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Supervising trainee registrants

Controlling registrant professional activities

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Who else would be appropriate if not the GOC?

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

I feel that all businesses offering optometric services/dispensing should be GOC registered to protect the public - it should not matter what the business name is, rather what they are doing.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

How can it regulate without inspection powers?

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

The public would easily think they have had a complete eye exam and would neglect to have the health checks.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality,

diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

As above - possibility of people neglecting the healthcare aspect of their eye examination once they have had their glasses sorted.

The health aspect of our work is heavily under-publicised. People don't even know they should have their children's eyes routinely checked.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It keeps the tangible benefit (glasses) tied to the intangible but more important benefit (healthcare) - this is to the benefit of the public, who are largely under-informed on the topic.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

My own personal rate is 1 referral per 14 tests

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

I have no firm data, but it seems logical - unless there was a concerted public information spree over a number of years targeted at all age groups and demographics - this would cost a lot of money to provide.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It doesn't have enough. The ability of online purveyors to sell contact lenses without any checks is a nonsense. As is the annual "halloween" contact lenses turning up at fancy dress shops.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It provides some level of public health protection, but the supply of lenses should be further restricted.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

In an ideal world, all glasses would be dispensed and fitted by a properly trained professional. However, outside of children, complex prescriptions and the visually impaired it seems unlikely harm would occur.

On that thought - perhaps glasses with a legal requirement - for example those needed for driving (or LGV/occupational driving) and safety glasses - could

be brought under the professional banner.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

There are not enough barriers - unregulated online sale is rife.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

It depends - are you planning to loosen or tighten the regulations? If loosen - then yes, harm is more likely. If tighten, then harm is less likely

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Again, it would increase harm by allowing patients to order anything they like - whether appropriate or not - without any guidance as to correct fit, handling, safety precautions etc

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I honestly don't know what the current regulations are. In my opinion a contact lens is a contact lens regardless of the rx - it is more about the potential for infection.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

As above

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

As above

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As above

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

It depends. If it became standard practice to space eye examinations further apart than 2 years, then it would be sensible to extend the length of time between prescriptions. As it stands, 2 years is a common standard interval and a good way to gauge whether a prescription can be used or not.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The disadvantage is that it removes any incentive to have a comprehensive eye exam, with the potential harm resulting from inadequate eye health screening.

In Scotland, access to two yearly free eye exams for the whole population has proven to be a cost-effective healthcare measure, reducing the burden to the NHS and the individual of preventable sight loss.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As long as sight test intervals are two years, prescription intervals of two years seems fine.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

It is important to protect children during potentially risky activities. This is a good way to do so.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

They would. And it might not fit properly and therefore not function properly.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It maintains a level of quality control

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Mixed - in rural areas it makes a lot of sense, but will need a lot of regulation to ensure we don't end up with the model recently seen in London (I think it was [redacted]) where the optometrist is actually abroad, testing remotely with a technician - how would you ever regulate that effectively?

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

I don't think remote care has been properly thought through and regulated - changes were implemented rapidly in response to COVID but now is the time to look at it properly.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

There is almost no regulation for online sales as far as I/the public can tell.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above
and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

testing sight

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear

selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

testing sight

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear

selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:

highly-developed communication skills,

expert dispensing skills, taking into account factors such as facial characteristics and posture

an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour

an ability to judge the decision-making capacity of a patient

Giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

is long-term and potentially expensive

has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia

may be of value to patients who are over 16, as well as to children.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

The GOC disregards businesses that appear to be registered outside of the UK, despite trading in the UK and supplying zero power cosmetic contact lenses to UK citizens.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

The testing of sight is closely linked to understand pathology and testing of sight alone could lead to missed opportunities to detect treatable conditions or sight/health threatening conditions such as AMRD, glaucoma and diabetes.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Disadvantage has been mentioned above - a dispensing optician only refracting would not fully understand the link between visual acuity and pathology so could miss preventable sight loss. De-regulation would allow dispensing opticians to refract without an Optometrist on the premise to oversee. There are therefore implications in the level of insurance necessary.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

?

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

?

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Yes, the sale and supply of optical appliances to certain groups of vulnerable patients should be further restricted so that it must be carried out by a registrant. Such patient groups should include people with learning disabilities or dementia because dispensing optical appliances to such patients requires enhanced skills and knowledge.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

advantages are that the vulnerable patients are given the best care.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

If it was relaxed patient care would be compromised and potential for sight loss created

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Not enough verification is done. There are at least 2 parents have admitted that they order contact lenses on their own specifications for their children online, so there is no aftercare offered and one of the children was not even aware how to insert or care for the lenses.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient care would obviously be compromised

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Specified dates to return for aftercare based on contact lens type or a universal 12month period.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

The risk would increase if the legislation is relaxed.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

? I don't think it's currently very effective as non registered suppliers are freely supplying lenses without recourse due to GOC criteria for investigating or taking action.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Answered no

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It is necessary to keep to ensure patients return for an eye health check. No date could leave patients with undetected conditions such as glaucoma which would later burden the NHS/state if sight loss occurred.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

SIGHT LOSS, obviously!!!

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

?

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

unsuitable appliances that are poorly fitted by untrained sellers could be supplied, compromising patient safety.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

?

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

?

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

uy

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

uyf

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

You should be concentrating on making eyecare safe for the public eg cracking down on illegal online sales or CL without a prescription not making it easier for this to happen just because you cannot be bothered to adress it. I cannot get an online prescription for myself for a POM without a GP prescription and I cannot even get flea drops for my dog online without a vet's prescription. If other professions manage to do this so successfully then it seems that you are the ones failing to get these requirements upheld properly. And your answer? Deregulate it so you don't need to bother addressing it. These are the things you should be addressing rather than deregulating our profession further. It won't mean much to be an optometrist in future the way things are going!

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction

Eye health examinations

CL fits

Non-registrants do not have the knowledge to perform these tasks and interpret the results holistically. It is not feasible to delagate these tasks as it would put extra pressure on the optometrist to supervise staff who may not be competent just to 'squeeze in more patients' into an already overwhelmed daily clinic. If mistakes are made then the optom will be held responsible. It's just plain dangerous for patients.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sight testing as it is now including eye health examinations and refraction. What a complete mess it will be if the sight test is split up into different parts and the only part restricted to optometrists is eye health examination. This would lead to a disjointed service for patients, extra pressure on optometrists to trust that nothing has been missed on refraction that may indicate underlying pathology and we basically may as well not be professionals if anyone can essentially do our job. You are basically destroying the role of the optometrist, putting patients at risk and the whole future of the profession for the goal of monetary gain.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The above should all be restricted to optometrists/CLOs NOT DOs (with the exception of sale of specs U16/VI

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

I think that current system should be left as it is as it works perfectly well. optometrists do not need further accreditation/training.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Yes. The GOC could investigate practices to ensure that patients are being seen safely. There is too much emphasis of getting too many people through the door to make money and not being allowed to give patients adequate time so the GOC should be ensuring this for the safety of patients and the sanity of optometrists.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

This is the most ridiculous proposal I have ever heard. There is uproar in the profession regarding this. There are endless examples of optometrists picking up on something in refraction which has led to the detection of pathology which may have otherwise been missed. If you agree to this you are putting optometrists in a very dangerous situation. They may miss pathology through no fault of their own and be held accountable when they didn't stand a chance. This goes totally against your own mission statement of protecting the public and upholding standards in the profession. The only gain from it is companies employing DOs as cheap refractionists. The losses to the profession and to the public are potentially devastating.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The only advantage is companies saving money employing cheap DO refractionists. The disadvantages are as follows:-

- Increasing potential for missed pathology ie putting pxs eyesight at risk
- Increasing optometrists stress by having to trust the delegated task is being done properly. I think it is highly likely that it will take more time for some pxs as if pathology is found then repeated refraction in a probably reduced time slot with the optometrist will put more pressure on optometrists
- optometrists will be responsible for a delegated task that isn't automated as is the case with IOPs, and so will be reliant on a less experienced DO getting things right. I don't see why I should be responsible for a delegated task that relies on skill rather than automation. I will not be held accountable for other people's mistakes
- The only thing left to optometrists as professionals would be eye health examination. How long will it be before DOs can do that too?! It's an absolute joke you are eroding our profession and destroying its future.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We would remain as professionals and patients would be safer. Only last week an optom colleague had a px who on refraction missed a couple of letters at the end of a line. On the basis of this she did a fields test and px had a hemianopia which was later confirmed as being caused by a brain tumour. A DO refractionist would not have picked up on this and the pxs life would have been at risk. What more evidence do you need???

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Contact lenses can cause severe harm to the eyes if not used appropriately. It is paramount that the px is at least given a chance to have the correct information given to them by a professional at a fitting appointment on the use of lenses and that suitable lenses are selected for them and eye corneal health is checked before wear commences. If fitting were not required then px is far more likely to have issues further down the line if wearing unsuitable lenses or has corneal issues which are not addressed eg dry eye, diabetic pxs. What about EW lenses? Some pxs have signs of corneal hypoxia during their trial period that show they are unsuitable for EW lenses. If these pxs are allowed to purchase without trial EW lenses would put them at high risk of harm.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safety for pxs. As stated above. CL have the potential to cause harm if misused so should be fitted by a professional only.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

What a ridiculous question - of course there would be more risk to pxs!!

- pxs wearing unsuitable or poorly fitting lenses
- higher risk px eg diabetic not being checked regularly
- px wearing EW lenses when their corneas cannot cope with it ie more risk of corneal ulcers if hypoxic
- pxs using inappropriate lenses as EW and never knowing/understanding the risks
- pxs wearing wrong prescription as they do not understand what to order online (likely to use their specs rx)
- No A/C as px will not want to pay a fee for our time if they can continue to get lenses without an A/C online. They won't care as if they have no issues then they won't attend A/C. The only time we will see them is when it is too late and they are symptomatic! Why on earth would you put px at risk??

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

You just need to get your act together and do like vets and GPs do and make it impossible to purchase lenses online without a prescription. Basically if I tried 9/10 sites in the UK who sell CL online I could buy CLs without a prescription. It baffles me why this is the case when it seems to be done so efficiently in other professions!

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I just feel utter despair at this statement. You all know the potential impact this will have on increasing the risk of adverse events through pxs misusing lenses or wearing inappropriate lenses, or pxs being unsuitable for lense wear at all but continuing wear after they have previously been advised not to. Without having to attend for A/C the signs of misuse or corneal damage which could be picked up and explained to a px will never occur, putting pxs at a massively increased risk of harm. Px's often have staining which means they need to be refitted or given advice on WT or use of lubricants. Pxs are often asymptomatic at this stage. Left unchecked we will only see the symptomatic cases where it is too late.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Yes. An aftercare should be provided by an optom or CLO at regular intervals for px safety. It should involve history and sx, VA with lenses, fitting check, corneal check with staining and appropriate advice and recall.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

They pose the same risks to eye health as powered CLs so should be treated the same.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Again, a frustrating question. You all know the answer to this. Of course they pose a risk as the risks are the same as powered lenses.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

You need to crack down on the illegal sale and supply of CLs wether powered or not powered. Maybe pxs would start taking the risks more seriously if they realised they could only get them with proper fitting and aftercares.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

as above

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

It is so hard to make a living in optometry. We have ready readers and online specs sales already. We do not get paid professionally for our time so px think we are ripping them off by selling specs at the prices we do when this is the only way we can subsidise this. They see cheap specs online and think we are conning them. Yet people think nothing of going to the dentist and paying high fees for their professional care. The more you deregulate aspects of our business the less we are seen as professionals and the less likely pxs are to ever consider paying us for our professional skills. This has to stop. Have some respect for our profession and start protecting it and believing that what we do is valuable instead of shredding it to pieces by deregulating every aspect of it for retail gain.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

If barriers were removed then pxs will be less likely to attend for sight tests until they have a symptomatic issue. In cases of glaucoma and AMD and many other conditions it will be too late to treat as it will be picked up too late and so put pxs at more risk of harm.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

As above - it has been deregulated enough already. People are less likely to come for eyetests if they can get cheap specs online or elsewhere and will only present when they have an issue which will often be too late. You should be increasing regulation to protect our profession and stop us being seen as cheap refractionists.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Again it would discourage pxs from having a sight test if they thought they didnt have to. They will only present when having symptoms which will be too late for many pathologies eg glaucoma and AMD which and be monitored or treated if picked up earlier.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financial gain for companies (a recurring advantage in these questions!!).

disadvantages:-

- px less likely to attend for sight test
- rx may have changed without px noticing
- conditions which could have been picked up at routine eye test will be missed and cause px harm

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages are that optoms have the professional experience and knowledge to assess each case and can at their discretion allow specs to be made on old rx when ST is out of date if exceptional circumstances exist. So if it is necessary for this to happen then there is a loophole to allow it to. For the safety of pxs other than in exceptional circumstances the px should be advised they need a ST if they are out of date. Again if STs are seen as optional it erodes our profession and puts public at risk of harm which goes against your mission statement.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

You should stop multifocal or high powered lenses from being sold online. The issues with poor measurements and inappropriate frame selection and fitting is ridiculous. Pxs often think their rx is wrong as the specs are so poor so come in for a recheck which wastes our time and makes px think we are to blame.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

you just need to stop deregulating everything further - its gone far enough now and confidence in our profession is at an all time low. The number of times myself and my colleagues get asked if we had to go to university to be an optometrist is ridiculous. Pxs seem surprised by the answer! Because everything is so deregulated the public perception is that we are not qualified medical health professionals. You need to work on restoring this and allowing cheap specs everywhere when we cannot charge for our professional services as px are so used to it being subsidised by spec sales that are now being undercut everywhere is just sabotage on our profession.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Ultimately it is impossible to assess eye health and VAs by remote consultation so asymptomatic eye disease will be missed

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

n/a

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Yes as in previous questions you need to make more regulation around this and actually follow through on it. Multifocals and high powered prescriptions should be exempt from online sales for px safety.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

exemption of multifocals and high powered lenses from online sales due to poor fitting, measurements etc causing poor outcomes for pxs

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Yes you need to ensure practitioners are allowed to take adequate time for pxs. There is too much pressure on rushing through pxs and squeezing in extras which is detrimental to px safety. Minimum ST time should be 30mins for a proper examination.

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

as above

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

must be in the patient's interest in terms of health and safety

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

non registrants should be prevented from performing refractions and eye examinations.

Also they should not be allowed to fit or prescribe or supply contact lenses.

They should not be allowed to dispense children under 16 or the visually impaired

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction and eye examinations together with dispensing to children under 16 and the visually impaired.

We should only be allowed to fit and supply contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

supply of contact lenses

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

we under take a rigorous training out side of our daily clinical work which is in the bset interest of our patients

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

this is not in the interest of patient safety

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I assume that full training would be given.

There are many elements to a patient's prescription which a dispensing optician may not be aware of. This is of utmost importance to the patient's wellbeing

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Optometrist are experts in this field and view the patient not only in terms of their spectacles but as an overall health check which is vital and very under valued, in my opinion

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

the fitting of contact lenses needs to be under taken by a trained professional, just the prescription but good instructions and aftercare

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no disadvantages to the current legislation regarding fitting but sales should be regulated and as far as I know they are not

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

under 16 s

disabled and vulnerable patients including those with visual impairments

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

the patients would be more protected from unregulated dispensing

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

contact lens sales should be more regulated

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

potential sight threatening problems for patients if not properly fitted or checked

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

online companies do not verify the prescriptions and should not be allowed to sell contact lenses

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

the companies rarely verify the prescriptions which is not in the best interest of the patients

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

regular check ups, every 6 months at least for children and annually for adults

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I don't know what the legislation is exactly

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

patients can end up with serious corneal problems if they don't know how to handle and care for their lenses

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

not sure

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

We need to ensure patients health and safety at all times

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

the 2 years restriction protects the patients and ensure that they have regular eye examinations

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The patient may have an undiagnosed visual problem which if not detected could be sight threatening .

Spectacles may be made incorrectly causing poor vision when driving or reading

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

the patients would have regular health checks via the eye examination

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

eye wear for under 16 s must be carefully controlled and dispensed

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

would be more cost effective for the parents but not necessarily safe for the patient

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

protects the welfare of the patient

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

the sale of optical appliances should be more highly regulated as this is in the best interest of the patients

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

n/a

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

contact lens sales should be more regulated

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

regulate contact lens sales

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Business registrant/employer

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

- testing sight
- fitting contact lenses
- selling optical appliances to children under 16, including sports eyewear
- selling optical appliances to people registered as visually impaired
- selling zero-powered contact lenses
- dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia
- giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses

7 What activities do you think must be restricted to our registrants?

Please provide details.:

- testing sight
- fitting contact lenses
- selling optical appliances to children under 16, including sports eyewear
- selling optical appliances to people registered as visually impaired
- selling zero-powered contact lenses
- dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia
- giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:

- highly-developed communication skills,
- expert dispensing skills, taking into account factors such as facial characteristics and posture
- an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
- an ability to judge the decision-making capacity of a patient
- giving advice on and treatment for myopia management, including through the

The fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

- is long-term and potentially expensive
- has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia
- may be of value to patients who are over 16, as well as to children.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Not Answered

Please give your reasons and provide any evidence to support these.:

Yes, there should be a consistent approach to business regulation, recognising that some activities are within the control of businesses as opposed to individual registrants, such as ensuring that:

- there is the right balance between clinical and commercial incentives
- there are appropriate standard operating procedures
- equipment is maintained correctly and staff are properly trained to use it

All businesses carrying out restricted activities should be required to register with the GOC and comply with its business standards.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Significant disadvantages since existing legislation already gives sufficient protection to the public and extension of regulation would be for no benefit and simply increase costs which would be borne by registrants and simply passed on to customers which is of no benefit to them.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

No, when the GOC considered this question in 2013 it concluded that the risks associated with business practices did not warrant an inspection regime. Since then, the GOC has strengthened the system of business regulation by introducing more comprehensive business standards that make clearer its expectations.

In the absence of evidence that the risks associated with business practices have increased and analysis showing that it is necessary and proportionate to

introduce an inspection regime, the case for doing so has not been made.

As a general rule, the GOC should think very carefully before increasing the costs of regulation and these will ultimately be passed on to patients.

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Would allow qualified and suitably trained and supervised people to be able to work together to support the best patient care and hospitals/GP practices.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Hospitals insufficiently fund optometry care in the community opticians. This leads to a restriction of service to the patient leading to dissatisfactory outcomes for them. Without a way to meet the need to provide sight testing alongside this optometric care, it will no be possible to meet the patient care that is required for these patients. Since sight testing and dispensing provides a profitable income, these will be prioritised over optometric care for minor eye care and support of hospitals leading to cancellation of these services, extended patient waiting times and poor outcomes for patients with potentially sight threatening conditions.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantage. The advantage is the protection of the public from risk

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Yes, the sale and supply of optical appliances to certain groups of vulnerable patients should be further restricted so that it must be carried out by a registrant. Such patient groups should include people with learning disabilities or dementia because dispensing optical appliances to such patients requires enhanced skills and knowledge.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing optical appliances to people with learning disabilities or dementia requires enhanced skills and knowledge, including:

- highly-developed communication skills,
- expert dispensing skills, taking into account factors such as facial characteristics and posture
- an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
- an ability to judge the decision-making capacity of a patient
- understanding of medical conditions

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Significant risk of unregulated supply leading to lens substitution, inappropriate lens supply or lack of checks to ensure supply is suitable and prescription is current. this would lead to increased eye infection rates and potential sight loss.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Without these verification requirements, the system would be totally open to abuse and unethical business practice.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

An appointment with an appropriately qualified professional that meets the best practice guidelines already set out by the ABDO and The College of Optometrists.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Non optical outlets would sell contact lenses to patients without any appropriate assessment of suitability, health constraints or guidance. This would lead to potential eye injuries, infections and permanent damage all of which have the potential to lead to possible loss of sight.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Without legislation, there is no protection to the public. What is the GOC if not a body to protect them.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would risk patients not having a regular eye examination for health and vision protection if they are unaware of prescription change which might render them below driving standards, unaware of cataract or other eye condition.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These restrictions are necessary to protect the public and should be maintained. We do not agree that the fitting process for such sportswear is 'not as complex' as for spectacles or contact lenses. Sports eyewear is fitted not only to ensure optimum vision but to afford protection to the wearer. Therefore, it is more rather than less complex to fit, requiring detailed questioning about usage and enhanced dispensing skills to ensure a safe, optimum fit. The call for evidence also suggests that the restrictions might be unnecessary because sportswear is 'usually only worn for short periods'. While diving masks, swimming goggles or sport goggles can be worn for short periods, they can also be worn over an extended length of time. In any case, if such optical appliances have not been fitted correctly and/or appropriate advice has not been given, there is clearly an increased risk of harm if a child is unable to see clearly under water or is wearing a poorly fitting pair of rugby goggles. This could also result in harm to team members or competitors.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantage

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantage

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The use of the GOS system should be amended to allow use of a GOS1 as a voucher rather than require it to be full payment for a sight test. This is encouraging opticians to drop out of NHS care which is restriction choice and access to services.

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

eye exams
contact lens fitting
sales to under 16s of any optical appliance
sales to vision impaired patients
sales to 'vulnerable' groups
sales to those with facial/head deformity/abnormality whether congenital or post surgery/treatment/injury etc
sales of high prescription lenses
sales of myopia management lenses
sales of 'therapeutic' tints

7 What activities do you think must be restricted to our registrants?

Please provide details.:

eye exams
contact lens fitting
sales to under 16s of any optical appliance
sales to vision impaired patients
sales to 'vulnerable' groups
sales to those with facial deformity
sales of high prescription lenses
sales to those with facial/head deformity/abnormality whether congenital or post surgery/treatment/injury etc
sales of myopia management lenses
sales of 'therapeutic' tints

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

eye exams
contact lens fitting
sales to under 16s of any optical appliance
sales to vision impaired patients
sales to 'vulnerable' groups
sales to those with facial deformity
sales of high prescription lenses
sales to those with facial/head deformity/abnormality whether congenital or post surgery/treatment/injury etc
sales of myopia management lenses
sales of 'therapeutic' tints

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

if a randomized spot check system which will only inconvenience well run businesses is the proposed idea it is a mistake - over bureaucratic, inefficient, disruptive and expensive and i assume there are already powers to inspect businesses where there is evidence of suspected irregularities,

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

I am unconvinced this would benefit patients - I believe it to be an idea orchestrated by large multiples as a way to further 'streamline' their own working practices to increase profits.
paying a DO to do half of the Optoms job, so the Optom can see more patients.
Its certainly a role DOs could fulfill - as long as there are proper checks and rewards in place.
however I feel rather than a furtherance of the DO role some businesses will jump at it as a way to make more profit for themselves with little reward to the DO, AND undermining the Optom role.
Plus it begins a split between Refraction - and - Examination which can only get further eroded in time to have separate refraction only appointments and full medical eye checks.
It would ease the pathway for rechecks though, if DOs had the ability to carry out re-refractions which get signed off by an optom

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I am unconvinced this would benefit patients - I believe it to be an idea orchestrated by large multiples as a way to further 'streamline' their own working practices to increase profits.
paying a DO to do half of the Optoms job, so the Optom can see more patients.
Its certainly a role DOs could fulfill - as long as there are proper checks and rewards in place.
however I feel rather than a furtherance of the DO role some businesses will jump at it as a way to make more profit for themselves with little reward to the DO, AND undermining the Optom role.
Plus it begins a split between Refraction - and - Examination which can only get further eroded in time to have separate refraction only appointments and full medical eye checks.
It would ease the pathway for rechecks though, if DOs had the ability to carry out re-refractions which get signed off by an optom

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

there has to be a legislative framework to govern how businesses run. streamlining regulation to what is necessary is key

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

'vulnerable' groups eg patients with reduced cognitive function due to illness or condition.
People with unusual facial characteristics.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

these vulnerable people will be cared for by a professional with a duty of care to cater correctly for the patient needs without unethical profiteering.
facial characteristics should be properly and conscientiously catered for by someone trained and proficient in fitting and measuring eyewear.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

in theory an online merchant can sell contact lenses ONLY if they've verified the prescription. this is easily worked around by patients without recourse.
shops on the high street sell plano cosmetic CLs without recourse.
not sure any legislative change will affect what goes on in CL sales

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

yes if changes make it easier to buy and sell planos without training, or liability. not that current rules are universally obeyed or enforced

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

if made easier to buy plano CLs for cosmetic use. there will be huge increase in infection rates, overwearing, sharing and spread of infection, mishandling resulting in opt/GP/A+E visits etc

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

should carry same weight as optical goods if not more as there is a safety element to it

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

because of the nature of sports eyewear the fitting, use, lens choice etc have more complexity than standard eyewear. there is an element of eye protection inherent.
if a registrant is necessary for the sale of U16s specs AND for the sale of protective eyewear - how can they NOT be necessary for the sale of U16 eye protective eyewear?

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

ridiculous ideas that an app can do an eye exam or online merchants can 'measure' OCs for accurate fittings. There must be more protection for the public from this new market place which is only about making money to their off-shore accounts, with all manner of 'miracle' products

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

there can be a place for remote care - maybe an A+E consultant can quickly triage via a webcam rather than px presenting at hospital is likely positive.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

i don't know how restrictive the regulations are, but there's plenty of 'bad' optical sales going on online (and from domiciliary providers) poor fitting, poor measurements, poor avenues of redress, sales to U16s, sales of over 5.00D without vertexes whatever legislation is in place there needs to be an appetite and budget to enforce it.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

i don't know how restrictive the regulations are, but there's plenty of 'bad' optical sales going on online (and from domiciliary providers) poor fitting, poor measurements, poor avenues of redress, sales to U16s, sales of over 5.00D without vertexes whatever legislation is in place there needs to be an appetite and budget to enforce it.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

in dealing with future technologies and threats to patients from unscrupulous profiteering online.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

- testing sight
- fitting contact lenses
- dispensing optical appliances to children under 16, including sports eyewear
- dispensing optical appliances to people registered as visually impaired
- dispensing zero-powered contact lenses
- dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:
 - highly-developed communication skills,
 - expert dispensing skills, taking into account factors such as facial characteristics and posture
 - an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
 - an ability to judge the decision-making capacity of a patient
 - giving advice on and treatment for

myopia management with adequate training only (i.e. completion of accreditation for myopia management spectacle lenses and contact lenses), including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

- is long-term and potentially expensive
- has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia
- may be of value to patients who are over 16, as well as to children.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

- testing sight
- fitting contact lenses
- dispensing optical appliances to children under 16, including sports eyewear
- dispensing optical appliances to people registered as visually impaired
- dispensing zero-powered contact lenses
- dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:
 - highly-developed communication skills,
 - expert dispensing skills, taking into account factors such as facial characteristics and posture
 - an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
 - an ability to judge the decision-making capacity of a patient
- giving advice on and treatment for myopia management with adequate training only (i.e. completion of accreditation for myopia management spectacle lenses and contact lenses), including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:
 - is long-term and potentially expensive
 - has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia
 - may be of value to patients who are over 16, as well as to children.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

- dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:
 - highly-developed communication skills,
 - expert dispensing skills, taking into account factors such as facial characteristics and posture
 - an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
 - an ability to judge the decision-making capacity of a patient
- giving advice on and treatment for myopia management with adequate training only (i.e. completion of accreditation for myopia management spectacle lenses and contact lenses) , including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:
 - is long-term and potentially expensive
 - has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia
 - may be of value to patients who are over 16, as well as to children.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

There should be a consistent approach to business regulation, recognising that some activities are within the control of businesses as opposed to individual registrants, ensuring that:

- there is the right balance between clinical and commercial incentives
- there are appropriate standard operating procedures
- equipment is maintained correctly and staff are properly trained to use it

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Not Answered

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

Refraction by dispensing opticians for the purposes of the sight test should be under the oversight of an optometrist or medical practitioner so that patients will continue to benefit from an eye health examination in conjunction with a refraction. This is a major strength of the UK's system of eye care and enables eye and wider health issues to be identified and addressed at an early stage in line with the wider health policy focus on prevention.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Enabling dispensing opticians to refract as part of the sight test under the oversight of an optometrist or medical practitioner would be a limited change to the GOC's 2013 statement on sight-testing. What is often overlooked is that this statement already allows dispensing opticians to refract outside of the sight test, e.g. to check a prescription.

The training needed to enable dispensing opticians to carry out refraction as part of the sight test would also be limited. We already learn about refraction as part of our initial education and [redacted] would need to provide additional training so members' skills and knowledge are up-to-date.

Enabling dispensing opticians to support optometrists and medical practitioners in carrying out sight tests would enable patient care to be provided in a more flexible way while upholding the principle that a sight test should involve both a refraction and an eye health examination.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Vulnerable patient groups should include people with learning disabilities or dementia because dispensing optical appliances to such patients requires enhanced skills and knowledge.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing optical appliances to patients with dementia or learning difficulties requires increased skills and knowledge, which includes the following:

- highly-developed communication skills,
- expert dispensing skills, taking into account factors such as facial characteristics and posture
- an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
- an ability to judge the decision-making capacity of a patient

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not Answered

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

These restrictions are necessary to protect the public and should be maintained. The fitting process for such sportswear is as complex as for spectacles or contact lenses. Sports eyewear is fitted not only to ensure optimum vision but to protect the wearer. Therefore, it is more rather than less complex to fit, requiring detailed questioning about usage and enhanced dispensing skills to ensure a safe, optimum fit.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These restrictions are necessary to protect the public and should be maintained. The fitting process for such sportswear is as complex as for spectacles or contact lenses. Sports eyewear is fitted not only to ensure optimum vision but to protect the wearer. Therefore, it is more rather than less complex to fit, requiring detailed questioning about usage and enhanced dispensing skills to ensure a safe, optimum fit.

Although sportswear may usually only be worn for short periods. Diving masks, swimming goggles or sport goggles can be worn over an extended length of time, depending on the wearer and activities. If such optical appliances have not been fitted correctly and/or appropriate advice has not been given, there is an increased risk of harm if a child is unable to see clearly under water or is wearing a poorly fitting pair of rugby goggles. This could also result in harm to team members or competitors.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Selling of spectacles

Sight testing

Selling of all contact lenses

Refraction

7 What activities do you think must be restricted to our registrants?

Please provide details.:

nil

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Refraction

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

As this ensures a high standard of post registration training

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

There is potential for harm to come to the patient if underlying pathology missed

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Financially disastrous for optometrists

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

3 Which category best describes you?

Member of the public

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Any dispense of glasses should be only done by a highly qualified person. This would protect the public from glasses that don't really fit purpose, or are not comfortable to wear.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Only qualified people should sell glasses to ensure the best possible vision. Going for an eye test I usually ask for a dispensing opticians to do my glasses and I find silly that anyone with one week of experience can make glasses. Why to be a pharmacist or a nurse people need to study years while to sell glasses which is an health appliance there's no need to have proper qualification?

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

no

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

As for everything else. Inspections help keeping business in line making sure the regulations are followed. (Do you think people would pay the car parking fee if nobody were in charge of checking it?) I believe that in many stores rules are not followed, simply because nobody is there to randomly check. Who ensure that only qualified people dispense to under 16? It is a scary thought.

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

Separate eye test from retail like many other countries in the world so both can be charged properly. And only qualified registrant to sell optical appliances and conduct eye test. Preserve and support the hard work optometrist and dispensing opticians do, like dentists and pharmacist are already protected and supported.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

What would be the benefit for the public? Refraction can be affected by some eye conditions and it is part of the optom job. sad how the optical environment suffers because of attempts to deregulate all these rules in place that protect the public and to guarantee the best possible care. I wouldn't trust anyone apart an optometrist to do my eye test in a store.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Negative impacts: less care for the public, higher chances to get prescription wrong and waste of time for patients that have to go back to the practice. I suspect this will be another step to deregulate the profession and people that studied hard and are qualified will be paid less than supermarket workers. In every other healthcare setting the profession is instead protected and supported. dental nurses are valued more than a dispensing opticians that studied for so many years and still, anyone can now sell glasses or soon the refraction will be done by anyone that can use the machine, not considering

that customers want to see a real optometrist when it's about their eyes.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It's important to regulate the profession and maintain very high standard to protect the customers

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Positive impact: ensure a qualified person refracts and give the best possible care to the customers.

Don't see any negative.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

To ensure a qualified person is the only one that can put lenses in, minimizing the risk of eye problem

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Everyone should have the right to be dispensed glasses only by dispensing opticians the same way everyone is served by a qualified pharmacist when buying paracetamol in a pharmacy and seen by a proper doctor in the hospital even if it's just for an x-ray. Vulnerable or not, don't we all customers have the right to be in the best possible hands? Just because now selling glasses it's all about putting data in a computer, doesn't mean that a dispensing optician is redundant. Every time I've had any question about glasses, the dispensing optician was able to help. Non qualified people just cannot give that level of care.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See above.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Contact lenses should be fit only by specialised and qualified contact lens opticians. This would reduce the risk of hurting customers, financial loss for the store if sued

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

To me some of these questions are nonsense. Why the prescription and measurement of contact lenses should not be verified? How would this benefit the customer?

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Personally if I wanted to wear coloured contact lenses I'd still go to an opticians. But I know many people buy them online. That is their own choice to put them in their eyes knowing nothing about how to safely do it and what the risks are.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

See above.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Reduce the risk of harm if customers never used lenses before. Avoid the use of coloured lenses bought in internet

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Unsure

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Unsure

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Consumers should be all protect. Not just restricted categories.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Unsure about what that is

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would be incredibly inconsiderate to sell glasses without a valid prescription. And I'm unsure why there is even the possibility of this happening. It looks extremely dangerous. If I'd go to a pharmacy asking for morphine without prescription, should they give it to me then? Glasses with an old prescription could lead to car crashes or to people falling down the stairs with serious injuries and financial loss at multiple level! Hospital bill, car insurance, missing working days, possibly store being sued for selling glasses that are not fit the purpose, undiagnosed conditions..

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See above.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Not sure

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Definitely the quality of vision might not be as good if sportswear is sold by non qualified. And it's the same for adults that are not in these restricted categories.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Maintain the best possible care.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

No

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Only qualified people should sell glasses. To everyone not just under 16. To ensure quality of care

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No sure

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Not sure

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Not sure

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Not sure

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Not sure

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Not sure

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Not sure

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Not sure

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Not sure

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Only qualified people should sell glasses to ensure the best possible care to everyone.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Not sure

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction

Health checks

Contact lens fitting/supply

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction

Ocular Health checks

Fitting and supply of contact lenses and optical devices

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Ability to perform YAG treatments
Glaucoma, macular degeneration and other specialist disease management

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Could open up sale and supply to non regulated licensed and unskilled businesses and individuals which could be dangerous

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Often refractive changes are linked to pathology so if tested in isolation the link between the 2 may be missed. Eg in the case of cataract development

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It will separate the professional view people have of optometry and optometrists.
Will make certain businesses more money as they will refract and dispense spectacles.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

You should be able to separate the health check side from the refraction but not the refraction from the health check. This will help develop optometrists as health care providers and enable future changes eg myopia management

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Across the 2 stores I work in the average is about 6%

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If deregulated could be dangerous as improper fitting lenses can cause harm

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Fitting of lenses by untrained people could be dangerous

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Having to have a signed order causes some difficulties for replicating lens supply. Virtual prescription copies etc should be acceptable

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financial benefit to sell more lenses but not always reliable to rely on packaging etc. would help people visiting from overseas etc

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Anterior surface health check and lens fit and suitability assessment as well as vision and prescription check

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If regulation of zero powered cl was dropped it would open up the cosmetic/fancy dress market even more than it is now. Leading to risks of infections and sight threatening complications. Even with restrictions there are still many unregulated suppliers the restrictions we'd tightening not loosening

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

If could supply without prescription oils get incorrect power. If no legislation on accuracy of appliance could be supplied not what was ordered

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Ensures people are regularly having eye tests to help ensure eye health and high levels of vision

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Consumers could have more choice, if they feel they're eyes are fine they don't need a sight test

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Free up chair time for health checks and patients with issues

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Not widely available so not widely used

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Will make having safety sports wear more normalised both prescription and non prescription

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Works well to have a responsible registered person overseeing sale and supply rather than have to be the one doing the sale and supply

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

People can access services more easily often solutions can be given without the need for face to face. Good triage system

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

No regulation so people interpret in their own way

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Include guidance on what services can be carried out remotely

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

There is not regulation. Often appliances purchased online are ill fitting and not correctly measured or set up properly

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Stricter regulation. To include having to see fit of specs etc at least once. If replica order is required ordering remotely is fine

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Widen prescribing and management abilities of common conditions eg ability to prescribe aciclovir for herpes keratitis etc

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]



3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

As they are now.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

As they are now

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

If dispensing opticians learned all the skills necessary to refract, they would become Optometrists.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages - the public would be protected.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages - the public would be protected.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

x

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

x

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

x

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

x

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

x

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

x

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

x

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

x

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

x

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

x

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

x

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Under 16 dispensing, adjustments and spectacle fitting. Prescriptions over 10 dioptries. Examination or refraction, unless under direct supervision. Overseas contact lens supply should have to follow the law in the country of delivery.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction, current legislation on dispensing

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

It's essential that the health check side of the test to be performed by an Optometrist, without significant training for Dispensing Opticians. Otherwise major issues could be missed.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

A positive factor would be in the case of a recheck, whereby the health and pathology of the eyes should have already been inspected. If a slight tweak in prescription is required, it seems unnecessary complicated for a patient to have to endure another test.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Career progression of a dispensing optician is very Limited. Being able to refract under supervision would add assist the optometrist.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The legislation is necessary for road safety and protection of eye health.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Current legislation probably increases the set up costs and creates a barrier to financially challenged patients to wearing lenses.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Specifically patients with complex prescription's and protective eyewear.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages would include greater patient safety and better quality of vision. The only major disadvantage is that it would be necessary for a Registered Optician to be on the premises at all times, like with pharmacy.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Patients would guess their own specification, and potentially damage their eyes or be unsafe with driving or using machinery etc

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A free for all leads to issues as in the above question.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

You must be seen for a contact lens aftercare every X month's for the health of your eyes and your safety, plus that of others.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Overseas businesses that sell to the uk

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Insist that overseas supplier's follow UK legislation

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

I don't understand what the objectives are

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction

Eye examination

Prescribing spectacle and contact lens prescription

Selling contact lenses and spectacles without an up to date prescription there needs to be more checks on these especially the online sellers

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye examinations

Refraction

Prescribing prescriptions for spectacles and contact lenses

IP

Diagnosis of eye diseases

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

IP and prescribing issuing drug prescription and advice on use of such medications

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

Not sure what this is

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

Not sure what the 2013 regulations are so cannot answer this question

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Unaware if any other business models will [redacted] the pharmacy one later

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Even a refraction can pick up other pathology which then needs looking into ie Kerataconus or lens opacities from retinoscopy
PX May feel they have had a comprehensive eye examination when only a refraction has taken place

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Disadvantage would be practiced with no Optometrist present will be refracting with no option to then offer a more comprehensive eye examination .
Patient may believe they have had a full eye examination rather than a refraction
Pathologies may be missed

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage would be maintaining status quo in an already very difficult financial market for Optician practices
Presume Optometrist salaries would decrease

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

15% from our practice management system

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

At the present time it is financially difficult to sustain an optical practice based on contact lens fitting and sales . If deregulated this will become financially much more difficult in an already difficult market

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Patients with learning difficulties
As well as SSI and under 16

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Accountability

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financial

The patients I see who buy contact lenses online rarely attend for their routine check ups only presenting when they have problems. They all receive contact lenses online without our practice ever being contacted for verification

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Yes in the same way an eye examination is defined

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Legislation does not appear to deter the physical stores selling Plano contact lenses now

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Some level of deterrence as it is now

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Lack of accountability

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

There is accountability at the moment to a governing body

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Risk of patient using incorrect prescription and not attending for a full eye examination risking missing out on pathology

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better healthcare

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financial

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Accountability

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Maintains status quo

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Photographs and images sent by social media platforms such as [redacted]

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

During Covid images sent electronically were very very useful , both practitioner and patient were better protected and speedier response times

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Data protection

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Not sure what the policy is

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Training

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Not sure of the legislation

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Need to read them

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refracting
Health check
Under 16s
Contact lenses
Partially sighted
People under hospital care ?

7 What activities do you think must be restricted to our registrants?

Please provide details.:

REFRACTION
Health checks
Contact lenses
Protected dispensing (not supervised) someone in practice / upstairs / in another store should be stopped for public safety and reason we get a degree

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Repeat DVLA visual fields at [redacted]
IOP for glaucoma refinement schemes

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

100% spot check those doing it correctly have nothing to worry about

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

We did a degree in optometry - what's the point of a machine can take over
Makes a mockery of the profession.

Optoms cannot prescribe without further year training and exams not fair to just give away a part of the sight test. Pathology missed - will the supervising Optom be liable ?

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Benefits multiples and money making opticians

Does not benefit patient health / safety

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Maybe 2 patients a day which I see - these will be missed if just a glasses refraction

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

No evidence accept would you ask a nurse to asses a heart attack patient or let a qualified doctor take the wrap when it goes wrong?

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

No barrier anyone can buy anything online without a prescription so makes contact lens opticians and practice pointless until it is correctly monitored

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Learning disability
Dementia (diagnosed)

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better patient care

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Online companies are not checking valid specifications

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Is 15min quick check good enough?

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

No fit and no health check

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Rechecks ? Remakes ? Who is liable if it doesn't work as Px doesn't have up to date information.
Small business could suffer

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better for small practices and Px care.

Buy online and faulty potentially damage Px in future

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Supervision

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

I do not believe the GOC truly has the interest of public health at heart here. Instead, I believe this must be a push from members of the GOC in high positions who also have a stake in Opticians and are looking to cut costs. Any objective individual will know this will have a damaging effect on our industry in the UK.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction, Ophthalmoscopy, CL fitting and Aftercare.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

All activities that include assessing a patient and managing their eye care. From refraction, ophthalmoscopy, cl fitting and aftercare. Very often these overlap. You often will not obtain a good refraction if the patient has pathology. Only with experience from an Optometrist will this be picked up. If non registrants/dispensing Opticians were to undertake this. Key pathology would undoubtedly be missed.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

I believe consultation and aftercare of refractive surgery should require additional GOC certification. I have worked for [redacted] where the training is sub-par and an Optometrist is expected to perform consultations and aftercare for Laser refractive surgery. Knowledge is picked up quickly but I do think this method of training by [redacted] is not in the best interest of the public.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction is only a small 'piece of the puzzle'. An accurate refraction cannot be obtained if there is underlying pathology. This is PRIMARY care, not secondary. Patients often are asymptomatic but have underlying pathology such as macula degeneration, epiretinal membranes, corneal dystrophies, cataract, posterior capsular opacification. A Dispensing Optician would not be able to detect for this. Allowing this would enable pathology to be missed, undoubtedly.

The risk of pathology being missed significantly outweighs the benefits which I can only see to be economical.

If the GOC had any degree of impartiality this would not go ahead.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Main risk would be pathology being unidentified. The question of liability then becomes debatable. Who would be at fault? The Dispensing Optician or the Optometrist.

Other major disadvantage would be the industry would again squeeze the income of Optometrists, during a cost of living crisis also.

I cannot believe the public would want DO's to be doing refraction on them when they are not qualified to tell them if there is an issue with their vision.

How can a DO validate a prescription change? How can they tell a patient who has underlying pathology that the +0.50DS change in rx will make a difference to their vision when the patient may have macula degeneration/corneal dystrophies/epiretinal membranes? They cannot detect and fully understand the pathology itself so would not be able to advise the patient adequately.

The risk of pathology being missed significantly outweighs the benefits which I can only see to be economical.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is in the best interest of the public! Enables the patient to obtain a more reliable and accurate management. If a DO was going to undertake refraction, would an Optometrist be then doing Ophthalmoscopy? Often doing refraction actually helps a clinician understand what potential pathology could be. I certainly would not just do one without the other.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Ensure the public health is secure and not allow cowboys to take over the industry and risk overwhelming the NHS with patients suffering from Microbial Keratitis!

I find the questioning here from an Optical Body absolutely ludicrous!

I could understand if I was asked these questions by a lay person or someone not in the optical industry, but this is shocking to say the least.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Could effect/increase risk of pathology. Especially from overwear of CL's which often patients do not detect.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If verification was not required before prescribing CL's, the business would inevitably hand out CL's that they had in stock. This may be a poorly fitting lens for the patient, if a toric/multifocal may even give the patient poorer vision.

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Impact of increased incidence of microbial keratitis.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients would be wearing glasses from such an old prescription. When it comes to changing to a new prescription they would find it so difficult to adapt.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safety of appliance. Correct fitting of appliance.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The GOC should have public interest at heart at all times. The current practice of some multiples of 'Ghost' clinics puts an Optometrist under severe time pressure and should not be allowed. Bring under this pressure makes mistakes much more likely and this is NOT in the public interest.

The GOC must regulate this practice.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction and funduscopy of any form

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction and funduscopy of any form

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

More in depth health examinations beyond the basic eye test, MECS etc and shared care work.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

Online sales of specs and contact lenses are the biggest current threat to the public

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Online sales of specs and contact lenses are the biggest current threat to the public.

This should be better regulated and these companies should also have to pay the GOC to be registered.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Yes. Again this should be the case for shops selling specs/contacts as well as internet sites

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

This would have to be with an optom on the premises (not overseeing from elsewhere as has been tested).

Also, refraction and health examination needs to be linked and should never be done separately as this would be a danger to the public, who often would choose not to have the health check to save money, or they think they don't need it

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

This would suit large multiples who are keen to save money on optoms as DO's would be cheap labour.

Patients would choose not to have one half of the test to save money as they may deem it unnecessary. Risk to patient harm

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better safety for the public is an advantage of staying as it is. Risk of missed pathology if refraction taken out of the eye examination and delegated

Greater capacity to see patients if more people could refract.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It rightly is only allowed by optoms and CLO's who are tightly regulated.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Current system protects the public.

It is a huge risk if this is delegated. We all have seem permanent eye damage/sight loss in patients who buy lenses online, or are allowed to buy different lenses to those that they are wearing, such as [redacted]

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

i personally feel this should only be done by qualified OO's or DO's, who actually dispense and supply the specs, for ALL specs

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better patient safety is the benefit.

increased cost of specs is the down side for patients, if only qualified (more expensive staff can supply specs/contacts).

A proper sight test fee would enable these costs to come down though

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Although these are not followed by unregulated sellers

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Huge risk.

Contact lens wearers need protection from themselves and if they can get lenses without a check up they often will.

Loads of examples of patient harm because of this with internet supply

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Huge risk.

Contact lens wearers need protection from themselves and if they can get lenses without a check up they often will.

Loads of examples of patient harm because of this with internet supply

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

People should not be able to buy lenses without being taught how to use them or checking that they actually fit

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It needs regulating to protect the public.

Advantage is it protects the public.

Down side is it costs more money

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients would not have tests if they could extend the Rx date.

Cheaper for them if this is the case, but risk to patient of not attending, re missed pathology

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protects the patient is a benefit

Risk is changing risks px harm.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Poor fitting appliances could be harmful to px

Cost more if regulated though

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Cost higher if regulated and cheaper if not

safer if regulated which is the most important thing

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Rumours that certain multiple is trying this to do refraction from outside the room

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

The splitting of the sight test into refraction and Heath components is unwise because often the first indicators of an optical pathology show themselves up in refraction routine and the practitioner can then make decisions as to the most appropriate course of action to preserve a patient's sight. Simple case a cataract may present itself in refraction and it then examined in further detail by the practitioner. Splitting the two functions will lead to a less holistic approach which would not be in the best interests of the patient.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

From performing hand held objective refraction techniques, subjective refraction, the examination of the eye with a view to the determination of ocular health.

The prescribing of optical appliances

The referral of patients to secondary care practitioners.

The endorsement of triage processes

The supply and fit of optical appliances and contact lenses especially to vulnerable groups such as children

Written prescriptions for use in ocular emergencies.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The testing of sight, refraction the writing and issuing of prescriptions

The supply and fitting of optical appliances or contact lenses to vulnerable groups

The referral of patients to secondary care.

The monitoring of patients in secondary care such as glaucoma, diabetes and other common conditions with ocular side effects and the prescription of appropriate medication.

Direct referral of patients into secondary care.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Registrants should be involved with the development of enhanced optical services that can be delivered in the community, our activities support and underpin the Hospital Eye Service, therefore it is entirely appropriate that registrants should be involved in these processes.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

I think that a four year registrable degree should provide every registrant with the expertise to prescribe ocular medication monitor diabetics and glaucomatous patients A registrable degree would bring optics in line with other Health professions like dentistry.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Removing the 2013 restrictions would integrate with the holistic nature of the eye exams which would be detrimental to a patient's ocular health.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The sight testing regulations ensure that a holistic patient centric approach to ocular health is achieved splitting the fiction will lead to commercial cherry picking in which the needs of the vulnerable and elderly may be sidelined.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A comprehensive and holistic approach to a patient's ocular health

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Daily records at practice level of sight test outcomes

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Daily practice records will show that referrals are often based on refractive findings and separating the eye exam may mean that patients ocular health may be put in jeopardy

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The fitting of contact lens is an invasive process and as such needs to be regulated so that suitable competencies are used in the supply and fitting of contact lenses

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The public are currently protected against the fitting of inappropriate contact lenses and the ocular consequences of poor patient compliance. The current system allows the patient to be monitored on a regular basis

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Children High Rxs and the visually impaired should be fitted by a registrant

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There can only be benefits to the vulnerable by allowing registrants to fit them

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Current restrictions on the sale of contact lenses promotes public safety thereby reducing the the risk of harmful ocular side effects due to inappropriate contact lens use

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Yes due to more harmful ocular side effects of contact lens misuse

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No they ensure that the px is supplied with the appropriate contact lenses

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient safety goes beyond financial implications, verification ensures the supply of the prescribed lenses a one size fits all approach is entirely incongruent with patient safety.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Aftercare should include examination of the eye with and without lens , an assessment of the visual performance of the lens , A review of patient compliance, and recoomdatons as to the performance of the current lenses should be made along with the new contact lens prescription together with a suitable expiry and recall date

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The public should not be using potentially dangerous devices without appropriate advice

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

More adverse ocular side effects due mishandling and abuse

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

I have removed a number of cosmetic cont lenses that have inadvertently got stuck in users eyes

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No impact public safety is maintained

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

It enables patient to go for regular eye tests which promotes ocular health and good vision

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Patients could be using an out of date prescription which may be masking an ocular abnormality

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disaster ocular abnormalities would go unrecognised doctors and the Hospital Eye Service overwhelmed by patients who have poorly corrected vision or even worse an advanced ocular pathology

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Public safety and a manageable Hospital Eye Service

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Under 16 year old are protect from poorly performing appliances

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Children would have access to shoddy and poorly performing appliances which could harm the eyes.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages and public protection and safety is maintained

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None the ocular Health and safety of the public are maintained

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

The eye exam should remain as a health and refraction check combined.

The majority of eye pathology is identified from patients who are completely unaware that their sight is at risk.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Dispensing spectacles to

Children

Drivers

People with sight threatening pathology

Substituting one brand of contact lenses for another without consulting the prescriber

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye exam

Refraction

Contact lens fitting

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Providing vision correction to
those with sight threatening pathology
Those who drive

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

I P prescribing
Valuable service,
economical use of skill
Greater ease of access for patients

Poor prescribing can be sight threatening

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

Clinical environment

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

But this could be obtained easily from GOS forms for NHS patients

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Sight threatened

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safety

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

But why allow online retailers to substitute poor quality product

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

You should mandate this across all retail markets in uk

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Harder to obtain means I will see less corneal abrasion

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safety!

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safer

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safety

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safety

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Video calls

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Video calls to patient in isolation

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Please address online suppliers who do not prescribe accurately

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Yes persue on line supply

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Submitted to Call for evidence on the Opticians Act and consultation on associated GOC policies
Submitted on 2022-06-15 19:49:33

Tell us who you are

1 What is your name?

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

H&S, contact issues techniques, contact lens fitting of presbyopes, complex patients and anything other than spherical dailies with +\-4 ds

Unregistered people cut corners/ don't have the extra knowledge to highlight issues or symptoms and spending more times with patients rather than having fragmented appointments let's you know that the patient has a flood at theirs and hence dehumidifies explain why eyes now so dry etc

7 What activities do you think must be restricted to our registrants?

Please provide details.:

This is the exact question as above

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

GPs and pharmacists frequently miss diagnose eye disease

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Clinical imaging universal qualifications even if a low standard would standardise things and care and improve things

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Binocular vision and behavioural clues will be missed. Compartmentalising appointments fractures care and means things get missed

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Will get abused by chains rush through care and mean people cut corners and don't get eye health checked as food / well

I'd quit the profession if we started to break it down and eradicate the need for the Optometrist.

Orthotists would be better than DOs infrequently highlight issues in their understanding about basic things

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

But also considering things we manage a DO couldn't and things like IP affect referral

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

People having the wrong rx getting eye strain, crashing cars and poor compliance leading to infections etc

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Education compliance and monitoring would be worse. People who buy lenses online get more infections.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Destroy the profession and increase issues of sub optimal optical performance, complications and infection

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better fitting lenses and better monitoring

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

No

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It's easy to enforce and will get abused otherwise. You can override if someone can justify and put their neck on the line. People will just get specs online from old prescriptions

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If we don't sell glasses we don't stay in business and people gone get their eyes tested

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I'm worried all these questions are being asked

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Standardised more. If no regulations buy wrong stuff online

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Nil

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/a

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Drugs and checking on practices more

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Misprescribed drugs by gps and pharmacists

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Online lenses and specs, work experience optometry apprentices bad

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Submitted to Call for evidence on the Opticians Act and consultation on associated GOC policies
Submitted on 2022-06-15 15:53:44

Tell us who you are

1 What is your name?

[redacted]

3 Which category best describes you?

Other - please specify

If 'other', please specify.:
(currently out of practice) Optometrist

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

They seem to be trying to deregulate refraction the way they deregulated dispensing.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Doing any part of a Sight Test except under Optometrist supervision.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The Sight Test as a whole. Meaning an Optometrist can supervise a non-qualified individual, in aspects of it like IOP measurements etc.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Referrals for Ophthalmic eye disease/dysfunction & general health investigations.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Financial for the Optometrist.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Financial for the Optometrist.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not affecting Optometrists financially.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

Possibly available online.

I would guess 17%.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would still allow potentially dangerous contact lens sale activity to continue online which could lead to dangerous scenarios from an Ophthalmic perspective e.g. px came into a clinic of a colleague unable to remove lenses from their eyes, that they had recently purchased online.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financial for the Optometrist.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Pxs not being educated enough to handle contact lenses safely enough.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financial for the Optometrist.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

So that all contact lens pxs get a minimum standard of care.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

If they were able to purchase lenses without suitable education on health & safety of this optical appliance.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Pxs purchasing contact lenses online without adequate health & safety education on usage.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Because poor visual performance could impact day to day activities like driving, for example, due to let's say a poorly fitted bifocal lens.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Because a loss of visual ability, for e.g. a deterioration in visual acuity could have implications for day to day activities like driving.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financial for Optometrist.
Potential visual deterioration implications for pxs.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing errors making their vision unstable & that having implications for day to day activities like cycling.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The more vulnerable in society being protected.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

An decreasing of false positive referrals to the HES.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The sale of plano lenses online, without supervision of Optometrists.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Put all optical appliances including plano contact lenses under Optometric practice supervision.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Upscaling of Optometrist roles into medicine & surgery.

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

On FTP investigations - streamlining them & making them easier for the practitioner to deal with.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

optometrists should have full clinical responsibility of the eye test.
The eye health check or refraction should be NOT be delegated to any other person

7 What activities do you think must be restricted to our registrants?

Please provide details.:

I think DO's should not be allowed to do any parts of the sight test.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

I think triaging a patient should be done by an optometrist, not a delegated individual.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

I think the GOC is too biased by multiple chain companies. The decisions GOC make are always in favour of big companies, not for the qualified OPTOMETRISTS they should be defending & protecting

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not Answered

Please give your reasons and provide any evidence to support these.:

ABSOLUTELY NOT!!!!!!

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It would be mean alot of problems in the long term for both the patient & the optom & practice.

At the end of the day who is going to be signing prescription- the optom or the DO??

No benefits at all to the patient or the clinician.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I think there is no disadvantages of keeping the sight testing legislation as it is.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No the currently legislation is fine.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Submitted to Call for evidence on the Opticians Act and consultation on associated GOC policies
Submitted on 2022-04-01 12:44:19

Tell us who you are

1 What is your name?

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Examination and prescribing of optical devices.

Unregulated remote supply of optical correction (specs and contact lenses) without verification

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye examinations and supply of optical corrective devices

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Supply of complex optical corrections such as prism, etc

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

If ALL directors of a business (company) are GOC registered, then there should not be a requirement for the business itself to also be regulated as this is just an additional unnecessary cost for the company.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

As above

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The eye examination would become a 2 tier practice.
General public will not be in a position to distinguish between them.
Sometimes the refraction can tie in with the pathology side.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The regulation would become a lot more complicated and introduce 'grey areas' if changed to include refraction as a dispensing optician activity. Optometrists will be devalued as most people on the high street will only want to pay for a refraction which will be done cheaper by a dispensing optician.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Don't know

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

If the sale of contact lenses became less regulated then there could be potential harm to patients as they would not be having regular checks to detect any adverse changes.

Depending on the type of change in regulation, there may also be a negative financial impact to businesses on the high street.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Removing the verification procedure would give the patient freedom to order whatever they want online and this may have a potential harm to their ocular health and promote misuse of contact lenses.

It would also be an additional burden on practitioners who are left to pick up the pieces in such cases.

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

If the change was for these lenses to be less regulated then patients will be put at risk by possible infection or adverse reaction to these lenses

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

If these lenses are regulated then the risk is minimised as the lenses would have to be manufactured to a certain 'safe' standard and the ocular integrity would need to be monitored to ensure safety

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There is access to online sites that are based abroad so difficult to legislate

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

n/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Consumers wearing incorrect, non-verified optical corrections could be putting themselves and others at risk, eg. driving with incorrect sight correction

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

This ensures that the person has an ocular health check to rule out any pathological sight changes

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There is a negative financial impact to those who are registrants (being a registrant is one of those) as they are have several costs that cannot be compensated for by trying to compete with non-registrants who are not being regulated.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Online and non-regulated sellers shed their professional responsibility and registrants suffer a negative financial impact as they have to abide by all the regulations and take on the professional responsibilities.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Sportswear with optical correction is no different to regular optical correction so needs to remain regulated for under 16s

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There may be a financial benefit to the purchaser?

There would be a disadvantage to the fact that a child may not highlight if there is a problem with the supplied optical sportswear and it would not be verified.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Require more regulation with online sales

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Purchases occur from unregulated online sites and registrants are still responsible for the ocular health of individuals that purchase from these sites

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

n/a

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Unable to regulate companies registered abroad but still able to supply in this Country

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Submitted to Call for evidence on the Opticians Act and consultation on associated GOC policies
Submitted on 2022-04-01 06:02:58

Tell us who you are

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Any activity which involves the patients prescription or health checks.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Only registrants should be carrying out refraction or such related tasks. Only registrants should be checking health of the eyes.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Dispensing opticians do not have adequate knowledge of pathology changes impacting sight and therefore patients may have ocular pathology undiagnosed due to the lack of care by a qualified professional proficient in pathology

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients safety and care will be upheld by keeping the current legislation

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Additional care and protection of sight related concerns for the vulnerable groups.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Negative

incorrect prescription causing accidents and lack of knowledge leading to further cl related complications and litigation for practitioners and practices

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unnecessary litigation due to complication

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There could be far reaching consequences for the patient with undiagnosed pathology, incorrect prescriptions road safety being affected due to poor vision not being picked up. This would be a regressive step as most people would purchase spectacles without an eye health check up

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would ensure that patients returned for a complete comprehensive eye exam and that simple things such as legal driving VA and advice to patient can be given

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Children may be negatively impacted by errors of the unqualified individual with no action against said individual. It's not always easy to pick up on children's visuals
distress and many children may be wearing incorrect or unsafe sports wear if deregulated

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Child safety would be first and foremost over profitability

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Current legislation protects patients from being impacted by profiteering over patient safety

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Online sales of varifocals and other appliances are left unchallenged and the online businesses are not held to the same account as on the street practices as they are not governed by the GOC. I feel like the GOV has failed to clamp down on these sales that do not have registered professionals employed to oversee the correct sale and supply of optical appliances.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Legislation should be pushed to hold these people to account. Sales of online contact lenses as spectacles should be regulated more stringently just like it is for individual and high street practices

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Dispensing of spectacles over +- 5.00D due to the need of effectivity calculations.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Contact lenses should only be fitted and assessed by Contact Lens Opticians. The standard of Contact Lens care delivered by Optometrists is lacking in proper standards.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

As mentioned above; powers over +/- 5.00D should be dispensed by registrants due to effectivity calculations. All complex dispensing should only be dispensed by registrants and this should be made law.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

It should be mandatory for Optoms to successfully complete the College of Optometry post grad cert in Contact Lenses prior to them being able to commence independent contact lens practice. This will increase standards and safeguard the public.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

To many businesses pay lip service to the GOC. Their main focus is KPI and sales figures with only a token gesture given to rules and regulations

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

There should ALWAYS be a qualified Optician on the premises during operating hours. Always; no exceptions. And furthermore it should be made mandatory that all optical practices should have a full time dispensing optician employed.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

Only once the registrant had completed the old FBDO R qualification that was offered to ABDO tutors about 10 years ago. It should be a post graduate qualification and not somehow included during the FBDO course.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Given the current climate of optometrist being paid significantly higher than DOs; to have certain DOs refracting would enable those registrants to further advance their careers (and their salaries), while simultaneously negating the need for practices having to employ multiple optoms on super inflated salaries, or rely too much on locum optoms who generally have poor skills and take advantage of the super inflated daily rates that are still being offered. As previously mentioned; I do not believe that ALL DOs should be able to refract: however upon completing of the old FBDO R post grad qualification then I strongly believe that this is the right thing to do.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If DOs were allowed to refract then it would allow many registrants to be financially better off while augmenting their skill set. To keep regulations as they are, we run the risk of too many Optoms becoming locums for pure financial rewards while never truly being part of a multi disciplinary team. There is too much power in the hands of the Optoms; DOs are somehow seen as the poor relation. The gulf between OO and DO, both financially and their professional remits is too great and needs to be shortened.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

There needs to be more regulation concerning the fitting of CLs, not less.

I strongly believe that the fitting of CLs by medical practitioners (including OMP) should cease.

Contact lenses should only be fitted by Opticians.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As above

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Over +5.00D and complex prescriptions

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Would mean that ALL practices would need to employ DOs as a legal requirement. Which I strongly believe should be mandatory

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Generally contact lenses are seen as fashion accessories by the public. High standards are the key to education. Optical assistants cannot be given any leeway in supplying. CL regulations need tightening up, not diminishing

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Essentially this is a joke. So many people buy contact lenses online from the Channel Islands, believing them to be UK optical companies and purchase CLs by manually imputing their "prescription". Nobody from the supply end actually contact the prescribing optician or even requires that the px scans an original copy of their contact lens specification or current in date sight test.

[redacted] are one example. I have posed as a consumer on the phone and could easily have purchased CLs with no specification. When I informed them that I was a clo they put the phone down.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

No CLs should be purchased without a specification. Assessment of suitability is a must. If joe public can buy what they like online their eye health will be at risk. You'll have people buying incorrect fitting CLs with the wrong rx made from ancient materials, over wearing them... sleeping in them.... showering and having a bath in them....possibly contracting acanthamoebic keratitis etc.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See above response.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Xx

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA. Current legislation is sufficient

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None. It is all about maintaining high standards

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Incorrect fitting frames, incorrect rx, incorrect PDs etc

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None, keep as is

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The recent cl "aftercare " being done over the phone during lockdown.

This was a travesty. It should never have been called an aftercare.

I see px in practice who say they are asymptomatic but upon slit lamp examination have neovascularisation, oedema, significant corneal punctate staining etc.... Things that cannot be identified during a remote session. Remote sessions are potentially dangers and DO NOT safeguard the public.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

NA

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Online purchasing of CLs. Too many people buy CLs online without ever having seen an optician for an assessment. Regulations need tightening up, and rogue suppliers need to be criminally prosecuted and shit down.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

See above

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Optoms and Medical practioners having to conduct post graduate studies of contact lenses as a mandatory requirement prior to fitting, assessing or supplying

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

See above

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

I feel the act does not updating to better the profession and to protect the professionals in question, at the same time making sure the public are always kept safe and not at risk of commercial gain.

The public need more protection from large chains abusing patients by booking them into a diary with short appointment times, prioritising a certain make up of patient who is likely to spend and does not cater much for urgent/emergency appointments.

Large chains take advantage of the current act for their gain and I feel these need to be plugged.

I also believe the profession needs to change in a way where more schemes are shared with our hospital colleagues. Currently, some larger chains are refusing to do these because the financial gain is not in there for them. This is unacceptable and is not fulfilling the GOCs duty which is to protect the public.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction
Ocular health assessments
Shared care schemes
Dispensing Under 16s
Dispensing SI/SSI

7 What activities do you think must be restricted to our registrants?

Please provide details.:

No comment

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No comment

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

More accessible IP accreditations and other shared care scheme accreditations should be approved for further advancement of our profession

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction is one part of the eye examination and not a tick box exercise. If this is performed by somebody other than an Optometrist/medical practitioner, they are unaware of the health of the ocular structures. Maybe the VA post refraction is poor, but without being able to assess the ocular health it will be difficult to explain why. It would add anxiety for the patient.

Rather than separating elements of an eye examination to different colleagues of different skillsets, it makes sense for one practitioner to do the whole

process as it paints one whole picture of the episode. This can be communicated effectively to the patient and reduces and unneeded anxiety.

Another reason is that this will no doubt be exploited by the larger chains, who have time and time again proven to be cut throat when it comes to making more profits. The GOC have done very little to protect the public in this and by allowing DOs to perform refraction will make this an easier objective for these individuals.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I cannot see any advantages at all in doing this. Maybe your non clinical responders will all find advantages but the truth is they will be able to exploit this for financial gain.

The disadvantages are listed above where refraction needs to be paired with being able to assess the ocular health as these 2 marry up with each other.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The way refraction is set out currently is the way it should remain, and if anything should be strengthened to avoid online refraction which have been popping up recently.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantages are all with the public. They will receive the best, most accurate care whilst reducing their anxiety. It ensures continuity with the same practitioner. It prevents rogue behaviour

I cannot think of any disadvantages

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

No data, however if refraction is performed on its own without the ocular health assessment, unnecessary referrals would be sent to our hospital colleagues which puts unnecessary burden on them. An example would be a mild crystalline lens opacity which does not yet meet the criteria for surgery.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

No data but from my experience as an Optometrist, I can tell you that separating a vital aspect of the eye examination is farce and does not bring any advantage to the patient at all.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No comment

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

People who have a spectacle prescription which exceeds a particular power in either meridian.
Many times I have encountered tired j correct PD measurements which have resulted in diplopia due to differential prismatic effect.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages would be to protect the public and avoid them of any consequences such as injury (falls, car accidents)

No disadvantages

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

If contact lens fitting/aftercare became something where non clinical staff can perform or supply, this puts the general public in danger and risk of sight threatening infections.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages are with the patient who is at risk of being supplied with these lenses by rogue traders which can have sight threatening consequences.

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Companies, online or High Street can abuse this and supply these lenses to the public. CL wear should be supervised by a registered professional as it puts the public at risk of sight threatening infections.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Companies, online or High Street can abuse this and supply these lenses to the public. CL wear should be supervised by a registered professional as it puts the public at risk of sight threatening infections

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

No comment

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Places the public at risk of injury if the correct prescription is not used.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The legislation is fine as it is however, it would be useful if it was strengthened further.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It places this protected group of patients in danger. Especially below 8/9 where the child is still in their critical/plastic period and at risk of amblyopia.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage is that it protects the u16s from unnecessary consequences

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No comment

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Companies using technology which allow online eye examinations. This should be banned. How can this be performed through a computer screen? It places the patient at danger as something very easily is missed which can be permanently sight damaging.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The patient is being provided with a poor assessment which means a failure of the jib of an Optometrist.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Technology can mean replacement of human jobs. This would be preferred by businesses as it would mean more profits for them. A machine also has no empathy or subjective input. This affects the public

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

No comment

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The sale of online spectacles should be banned entirely. I see many patients who have been provided with incorrectly glazed lenses. This puts the patient at risk of injuries.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

There should be a blanket restriction on any online sales or spectacles or other protected optical appliance which impacts a patients life

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Businesses should be required to prioritise clinical needs more than financial. It is becoming more common where financial gain is prioritised and this affects the public, ad their interests are not at the fore.

53 Are they any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

More tighter business legislation, including minimum eye examination times.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Allowing DOs to refract will be the end of optometry

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refracting dispensing and examination

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refracting dispensing and examinations

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

It will inevitably lead to multiples using cheaper DOs and forcing OOs to do dangerously fast health examinations only

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It will inevitably lead to multiples using cheaper DOs and forcing OOs to do dangerously fast health examinations only

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Issue and supply of contact lenses including cosmetic lenses

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sight testing and contact lens fitting. Spectacle and contact lens supply.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

MECS

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Other higher qualifications Glaucoma, medical retina etc need to be accredited, though these qualifications should have be able to accept more work placed learnt skills

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

I feel the multiples have too much influence and the GOC needs to be able to inspect them and hold them to account more, such as when a video of a multiple employee is telling others how to circumvent lockdown rules to in order to increase sales.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction is essential part of the eye exam. Separating the refraction which can provide a lot of information to the Optometrist reduces this knowledge.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Sight tests may be more disjointed and not completed fully, more steps in the process creates more spaces for mistakes as does increased workload which this change would likely bring with it.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Only impact i can see is will stop multiples cutting cost overheads

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Still doesn't cover the sale of plano lenses which is still medical device.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Possible mistakes is supply of lenses

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

Not if the regulation was tightened as it needs to be

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Poor patient education on how to handle and care for lenses

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Risk to patients regarding their eye health and general public if drivers are being issued spectacles that are outdated.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better public protection

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Poor fitting, possible prismatic effects that could impact binocular vision

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Good Patient protection

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Good patient protection

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Not aware of any specific regulation currently for all new remote technologies

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

No

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Site test is out dated 1948, should be eye examination as Scotland.
Add in roles minor surgery.
Add in use of laser.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

As already on line spectacles, contact lens supply effectively without an up to date examination, deregulate the part of the sight test that produces a prescription allowing the use of auto-refractors.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye health.
Children under 16.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Routine operations, i.e. no comorbidity, the post operation assessment should be carried out by the patients optometrist and not the provider of the surgery. The optometrist as a third party then enters the information into the National cataract audit. At the moment the providers of the surgery often enter their own data. A little like marking their own homework. With so many commercial companies providing cataract surgery this independent recording of date would promote better actual care.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Minor surgery. Why delay care for fluid and sebaceous cysts, large concretions
Use of laser. SLT is now the first treatment for much OHT and POAG.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

But you will never have the powers to implement?

Areas

The over prescribing and dispensing by some organisation.

Especially

Low spectacle prescriptions especially children.

Persuading (with commercial targets) patients to have new spectacles when it is of little benefit to good vision.

Ban commercial targets on sales.

A level playing field.

Objecting to monopolies.

For example DVLA visual fields. Here pts are limited to one provider, and have to often travel miles for a service that could be provided locally.

Also DRS Diabetic Retinal screening, this should be a specification available to any qualified practitioner.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

Promote ocular health.

As demonstrated with the delay in eye examinations due to COVID, there is a lot of pathology that now has delayed care.

For DOs allow automatic refractors.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

No disadvantage if pts understand, just for spectacles it is not for eye health.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Combined with the extreme underfunding of the NHS sight test, the patients are having to pay for the service by being supplied sometimes with spectacles that are not needed for better sight.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Practice records, [redacted] software, and nhs email referrals.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The present legislation is not implemented, anybody can without check ups just keep obtaining contact lenses over the internet.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Q

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients not getting check-up and being reminded on hygiene.

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

But the legislation is not enforced.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

There are risks now, with patients coming to harm wearing contact lenses especially cosmetic with their lower oxygen transmission. Less regulations would make it worse.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

As above

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantage but you need to implement the legislation.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No, you need more.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Pain, possible ocular damage, and ocular damage.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

From discomfort, to ocular damage with possibility of permanent reduction in sight. See any eye department casualty.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

The delay in patients being re-examined due to COVID-19, demonstrates that patients are missing out on much needed ophthalmic care, problems due to cataracts, glaucoma, macular degeneration, et cetera. So you need the two year period to avoid patients missing out on ophthalmic care. It is not uncommon already that patient using ready readers off-the-shelf spectacles and delay accessing care for ophthalmic problems. Many conditions are insidious.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages - None.

Disadvantage - out of date prescription, many change by a year much less two years.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As previously explained.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Swimming Goggles would be okay at the worst they leak. But not sports spectacles, they need to stay in place.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages - as stated.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage - it worse bar May be for swimming goggles.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Nil

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

SLT laser

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

AI to read retinal images and OCT.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

A depends on what SLT is classed as.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Nil

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Nil

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Yes, there appears to be a lack of implementation.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Nil

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

For IP, injected drugs is an area of exclusion.

They would be useful

1. Injected anaesthetic (say lignocaine) before managing lids with fluid and sebaceous cysts, plus large concretions, etc
2. For intravitreal drugs for, CMO & Steroids, wet MD & anti-VEGF, etc.

Managing CMO after cataract surgery would save patients travelling, save urgent appointments in an already hard pressed secondary ophthalmology. At the moment patients with wet macular degeneration are losing sight before they get to hospital and also from a regular follow-ups in the hospital. Plus elderly patients sometimes just don't get to their appointments in the hospital because it's too hard to get there, but their local optometrist is much easier. Macular degeneration patients are usually well into the 70s 80s and 90s.

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

As above

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Injections and IP as above

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Nil

Further information

56 Can we publish your response?

Yes

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Testing Sight

Fitting or carrying out contact lenses aftercare

Issuing prescriptions

Any dispensing with no registrant on the premises.

No dispensing at all to; U16, visually impaired, safety spectacles and low vision aides.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Only registered Optometrists should be allowed to complete a sight test.

The current restricted dispensing categories should remain but also stipulate a registrant must be on the premises to dispense ANY pair of spectacles or contact lenses.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dispensing of low vision aides and safety spectacles.
Dispensing anything should only be allowed if a registrant is on site.
Offering MECS/CUES services

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Refraction for dispensing opticians.
MECS accreditation for all registrants including CLO and DO.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

GOC needs to inspect to ensure business profits are not put before patient safety.

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

DO's have extensive knowledge of refraction and practice this whilst studying. I feel as a DO I have a lot of knowledge and training which I'm not allowed to use due to restrictions which are counter-productive as I feel Optometrists themselves are over qualified to refract and should be undertaking more clinical tasks in the area of eye diseases/pathology to help relieve pressures on hospital eye services.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantages would be to allow DO's to actually use knowledge gained whilst studying ophthalmic dispensing. I feel both DOs and Optoms are over qualified for what they do. DO's should be able to refract to give them more scope professionally in an industry where dispensing is 90% unrestricted. It would ensure better salary and development prospects. As for Optometrists it would allow them to work closely with patients in a more medical environment to take pressures off of the hospitals.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unsure. I feel the contact lens regulation is doing a good job.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Safety spectacles

Any low vision aides

Patients with any kind of learning difficulties

All dispensing should only be allowed if a registrant is on site.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Restricting tasks to registrants would only be a positive thing as it ensures advice given would be from those with the correct training and have the correct standards of practice. It would safeguard against poor patient care.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Increase use of improper contact lens wear and care if unregulated.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

All optical appliances should only be dispensed under the supervision of a registrant.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The regulation is not working, a quick [redacted] search will show that illegal dispensing happens very easily and regularly.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Dispensing in general needs to be regulated properly. I feel all dispensing should be done only under supervision of a registrant.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Submitted to Call for evidence on the Opticians Act and consultation on associated GOC policies
Submitted on 2022-04-01 18:43:23

Tell us who you are

1 What is your name?

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Dispensing Rx over +/-6 with cyl over 1.50

Children

Varifocals

Enhanced services

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Activities that if measured wrongly will affect px vision, comfort and safety

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dispensing high Rx and children

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Negative- MUCH more training would be required, the job of a DO is vast. It usually incorporates management and staffing. We don't need to do the job of an OO. Px trust an OO to do this. This would result in more remakes and whilst appearing g to save chair time will cost money in a different dept

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not able to answer that really

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Elderly are vulnerable as are people with special needs and children. You could say all people are vulnerable when it comes to picking specs that are correct for them As it is not an area they have knowledge in. And do largely once every 2 years. So are vulnerable to sales talk and making the wrong decision without trusted guidance.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financially it would cost employers more as they would need more qualified staff. Positively it would improve the business of optics as less mistakes and bad pairs of specs would be sold. It would improve the image of optics and therefore less complaints to the gov

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

There is already harm to patients as non optical suppliers supply contact lenses to px illegally with no fear. Any less restrictions would increase eye damage

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

They do t create barriers. But they are not followed. We see px every month buying online from people who have not checked their RX. Have let them buy lenses different to what they were prescribed- cheaper ones and we see damage to px eyes.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Increase in eye damage and blindness. Make it easier for px to damage their eyes unwittingly. Reduce the respect for professional . Public initially gain money, business loose money. People go blind

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Not totally sure but should say by a specialist, include eye test without cl in, check power and fit of lens, check cleaning regime and handling

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No impact as the legislation is not upheld as it is !

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

NA

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

To prevent sight loss, trips to A and E, future drain on the NHS

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Increased disease as people won't have their eyes checked
Financially bad for business but far financially worse in the long term for the NHS

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unknown

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Increase in damage to child facial growth, increase in unwanted effects from poor measurements.
Cheaper for mum so more children would get protection but visually poor outcomes. More issues at sight test so more chair time is expensive to business. For no financial gain.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unknown

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Ready readers over plus 2.50 should require a sight test

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unknown

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

NA

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

NA

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

More guidance for GPS in working with Optics. And the use of a free NHS test

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

CPD provider

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

They are broadly right however there should be consideration of whether it is right to bundle eye healthcare with the determination of the spectacle prescription. In 1989 the dispensing of spectacles was effectively separated from the testing of sight to allow patients the choice of having a sight test with one company and buying their glasses from another. The same separation effectively happens for contact lenses where fitting can be carried out by a different practitioner to the sight test, and supply by yet another company. I would like to see the sight test separated in to eye healthcare and refraction because the new (post ESR) learning outcome 3.3 reflects my belief "engages with technological advances in eye health and broader healthcare delivery and the significance of specific developments for enhancing patient outcomes and service delivery". Over 20 years ago we saw the introduction of wavefront aberrometers from which we could make spectacles accurate to 0.01D (rather than the current 0.25D) (subject to a manual binocular vision test to determine any need to prism) and also personalised lenses that compensate for lens position and frame fit as well as individual facial characteristics have barely caught on in the UK ([redacted] don't even sell them in their core range and going outside core range is frowned upon) despite them individualised lenses offering greatly reduced aberrations and improved vision to a significant number of patients. The refraction and measurement appointment should take longer than a typical current sight test to do properly. Many people currently have a huge amount of eye healthcare provided by medicine / ophthalmology why should they have to also have to have an eye health exam from an optometrist if they just want a pair of glasses?

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

I believe all aspects of the current sight test and contact lens fitting should be restricted to GOC registrants, however I believe CLOs and (suitably qualified) DOs, especially those involved in low vision practice should be able to refract independently.

Currently I believe the system of ophthalmic dispensing restriction is not fit for purpose. Whilst I think it is acceptable for children and severely / sight impaired patients to have the protection of being dispensed by a registrant there are a number of problems. Supervisors are mainly "on the premises" but not otherwise in a position to intervene, especially if they are optometrists, but even if supervision is carried out professionally there are a number of patient groups that are shown a disservice by the current system.

For example patients with a prescription over +/-5.00D in the highest meridian including the reading addition where applicable need to have the vertex distance of the frame taken into account if it is different from the vertex distance during the sight test and a new prescription calculated to give the same effective power at the eye. I believe these patients should fall into the restricted category, and this especially applies to very high power prescriptions falling into the NHS / GOS "complex lenses" category over +/-10.00D. There are also a whole host of low vision patients (over 1 million by RNIB

estimations) whose vision is much better than that required for registration as blind or partially sighted but still outside the legal limit for driving and / or at a level where ordinary reading activities cannot be undertaken with ordinary spectacle correction. Optical assistants are simply not capable or qualified to deal with these situations

It is not good enough for supervision of dispensing by non-registrants to be by optometrists who never leave their room or DOs who sit in a back office - that level of supervision may be acceptable for routine patients but not restricted categories. Additionally, over and above supervision, patients in restricted categories who are dispensed by assistants under supervision should be afforded the same protection / assurance of safety that is afforded to patients of pharmacists and dentists where support staff are either qualified (at level 2, 3 or 4) or qualified AND registered. I have seen practices with remake rates in excess of 20% - i.e. 1 in 5 patients specs are not correct - mainly due to dispensing error. The higher the prescription the more likely errors will be made as tolerances are tighter.

Given that most NHS / GOS voucher patients are either on a low income or children it could be argued that they are all vulnerable in some way and would benefit from the protection afforded by being dispensed by a registrant.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

- Use of therapeutic ocular drugs - restricted to to IP OPToms
- Examination of the back of the eye - restricted to optoms
- Contact lens fitting and anterior eye examination - restricted to CLOs and optoms
- Refraction and binocular vision - restricted to all current GOC registrants including DOs who have trained to refract independently (this course could be the same as that completed by ophthalmologists and takes about 6 weeks). I would favour orthoptists being allowed to refract independently and as a quid pro quo DOs getting involved in school vision screening to try and iron out some of the eye care service gaps.
- Dispensing to restricted categories of patient (an expanded list as above) - whilst kids and LV Px should be limited to current registrants the GOC might consider expanding the number of registrants to include optometric clinical assistants engaged in pre-screening, contact lens assistants engaged in teaching patients how to handle and look after lenses, and dispensing assistants engaged in dispensing current non-restricted categories.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

dispensing complex prescriptions, prescriptions requiring a vertex distance and patients with low vision better than the level required for registration SI/SSI should be restricted as should all spectacles where a NHS / GOS voucher is used. A good compromise would be for Px with voucher B, C, D, F, G, H and their private equivalents to be restricted - this accounts for about a quarter of spectacles dispensed.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Independent prescribing of spectacles by dispensing opticians (i.e. refraction) should become part of the normal role of an optician as it is in most of the rest of the world everywhere except a small number of English speaking former British Colonies. The ECOO Blue Book gives the scope of practice for over 30 European countries and clearly demonstrates that most "optometrists" are in fact refracting opticians. There is no evidence that refracting opticians alongside optometrists and / or ophthalmologists produces higher rates of preventable sight loss than the UK model, indeed quite the opposite might be inferred. It is important when allowing DOs to refract independently that patients receive the same kind of warning they get when they purchase ready readers to have a regular eye health examination from an optometrist or ophthalmologist.

The GOC should also regulate vision therapy, colorimetry and other fields of practice / additional training more thoroughly or at least extend Part 5 of the Opticians act to reserve the right to do so in the future as it has with orthoptics

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

This should not only apply to restricted functions in terms of supply of optical appliances but to all supply of all medical devices to all patients. Without registering a contact lens business for example, it will be impossible to prosecute when it does supply lenses to a child.

The playing field is not level with regards to business regulation and this has several affects that reduce patient safety and are also bad for individual registrants where they work for businesses that have chosen not to be registered and find themselves personally liable for the activity of a business that in reality they had little control over.

Companies such as [redacted] are able to ignore the (poorly written) rules on contact lenses and the GOC seems powerless to act as it lacks the statutory power to prosecute and must resort to a fruitless private prosecution, which, even if successful has no deterrent effect as the fines are miniscule compred to the sales revneu and profits involved.

The last private prosecution that I am aware of was GOC v [redacted] in which the company was fined I believe £50,000 but never paid the fine and simply moved off shore to the Netherlands and employed optometrists registered in France and elsewhere in continental Europe, whereas the UK optometrist ([redacted] ?) lost his house and business of 6 or 7 practices. It seems to me that an indivudal registrant being effectively fined hundreds of thousands of pounds when business gets off scot free is unfair.

The [redacted] case had similar consequences - she has lost a decade of income whereas [redacted] got a slap on the wrist depsite being part of a \$100Billion turnover global multinational enterprise.

I have been involved in a number of GOC FTP cases against previous employers and also supported individual colleagues through the process including attending hearings as a member of the public and as a prospective witness (though I was never called).

One aspect that shocks me is that there is no obligation of businesses / sole practitioners / partnerships to declare how many complaints they have had in a given year, how many made it to the professional body for assistance, or how many were settled by the insurance company, or what action was taken to address the situation (e.g. providing training to all staff).

Each year dozens of missed pathology cases result in patients going blind unnecessarily but there is no obligation for the business to inform the GOC if it provides a settlement. Another common patient harm is being given hydrogen peroxide solution without proper instructions on how it needs to be neutralised before the contact lenses are put in - apparantly having your cornea disinfected is agony, but in my experience results in a 4 or 5 figure settlement.

Hundreds of thousands of patients receive incorrect / inappropriate spectacles each year that require remaking or refunding - no attempt is made by companies to improve this dire situation - it is cheaper to inconvenience patients than properly train staff. Under RIDDOR accidents have to be recorded in a book and certain incidents reported to the authorities - why is it not compulsory to have an adverse incidents register in all practices and require companies to make a return as part of renewing registration - all companies record this information by the way so it would not be too onerous to do. Data on retests, remakes, refunds, complaints, insurance company claims, involvement of professional legal representation shouldall be reported in my opinion.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

The impact on most businesses will be minimal unless they are systematically breaking current rules.

Many companies, currently unregulated, break the contact lens supply rules, by exploiting a loop hole where any valid contact lens specification will do and it doesn't matter which lens is specified as long as it in date. This was clearly not the spirit in which this legislation was intended to operate and the GOC is currently powerless to act - it is pointless publishing clarifying rules if the GOC is unable to sanction those that break them.

There is similarly no real regulation of websites selling spectacles. The 1984 rules are clear (when read in conjunction with the current British Standard) that where the prescription is over +/-5.00D a vertex distance is required on the Rx and the seller has a duty to check the vertex distance of the frame and compensate the Rx as required. Clearly the websites are not checking vertex distance and are therefore acting outside the law supplying specs over +/-5.00D in the highest meridian including the reading addition - I know for fact this goes on as I have worked for several websites selling direct to the consumer and this rule is not even something the owners were aware of or cared about. Patients don't complain they just demand a refund but they are put to serious inconvenience and more seriously on higher powers this could make the difference between the patient being within legal driving standard and not meeting the standard and having an accident with potentially fatal consequences.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Absolutely, and I would like to see every business inspected say every 5 years, and / or a duty on the NHS to update the GOC when it carries out an inspection on a practice.

It is important that all premises are regulated individually so that appropriate fees can be collected, however with large companies like [redacted] for example (which has applied pharmacy procedures to optics), the GOC could attend a meeting of their clinical governance team or patient safety group and inspect the minutes. These are good systems at improving standards and should be introduced across the multiple sector.

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

I'm not really sure if the GPhC model would work - optical practices can often be much larger than pharmacies with upwards of 70 staff and dozens of registrants working on the premises in a given week. There does need to be someone taking overall charge however how is the "baton" handed over on their days off or when they finish shift or go on lunch?

One benefit of the pharmacy system which enables the "responsible pharmacist" system to function is that all staff are suitably qualified and trained to the level of their responsibilities at level 2, 3 or 4 and therefore the responsible pharmacist can be assured that they are not putting their own registration at undue risk. In my time I have witnessed optical assistants hand out specs to children, or worse unaccompanied parents, and hand out contact lenses to patients whose records specifically said an appointment was required, when there was no registrant present. One even admitted to using fluorescein to see if they could find a fragment of contact lens in the patient's eye - luckily a contact lens optician was able to drive across town and take over within 10 minutes but it is amazing what OAs without the proper training will take on. It is equally amazing that employers will not pay for the right training unless compelled to do so. For example [redacted] puts all its retail support staff (who do dispensing, pre-screening, contact lens teaches etc) through a retail apprenticeship programme rather than one of the specific optical ones that have existed for years and are used by [redacted] and [redacted]. Other opticians offer no real training and people muddle through, but even where all dispensing is carried out by DOs and CLOs do their own teaches and optometrists do all their own pre-screening things still go wrong - usually on a Monday when there's no registrant available.

When you sit in the safe sheltered environment of a CET / CPD session and ask registrants, without fear of prosecution, to tell you of the adverse incidents that they have experienced as many times as I have you are consistently amazed there are not more fitness to practice cases than there are. It's a good job the public think we are spec peddlars and not registered healthcare professionals isn't it?

I'd stop short of registering optical assistants as it done in dentistry but having everyone qualified at some level so they understand the law is essential - we all get GDPR training and Fire Safety why not Standards of Practice and The Opticians Act?

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes - under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

Patients should be free to choose to get their eye healthcare from one provider (e.g. a hospital eye department or a clinical optometrist) and their refraction from another (as is the norm in much of continental Europe, e.g. France) in the same way they can currently get their sight test, spectacles and contact lenses from different providers. They should also be free to choose to get all these things from one place as now.

Although the World Council of Optometry cautions against this

https://www.healio.com/news/optometry/20121212/10_3928_1081_597x_20120101_01_974047

<https://worldcouncilofoptometry.info/wp-content/uploads/2020/09/Stand-Alone-Refraction.pdf>

its paper is flawed. The risk that "patients... may assume their eyes have been examined to see if they are healthy" is similar to the risk that patients who have relied upon ready made reading spectacles since they were legalised in the 1980s may also avoid having a regular eye health examination. Although similar the risk is much lower because patients consulting a dispensing optician for a standalone refraction would have the protection of seeing a registered professional with the correct training and professional indemnity insurance whereas patients self-selecting ready-readers have no such safeguards just a few lines of advice on the packaging which is often missing altogether.

The risk is further mitigated by comprehensive taking of history and symptoms, particularly family history of glaucoma, and also history of recent eye health examination. Currently optometrists are only obliged to examine the fundus and conduct "any other tests deemed necessary". This means that in some practices the standard screening test for glaucoma (non-contact tonometry, puff of air test) is not routinely carried out (even in over-40s!), and similarly visual fields are not always assessed either even though they screen for several pathological ocular conditions. To this extent dispensing opticians can take the same approach as optometrists - if they feel the test needs carrying out they can refer the patient to an optometrist, and would be well advised to do so for all patients who have never had an eye health examination or have not had one for a specified period of time. Given that the eye health examination would still be available on the NHS through GOS for under-16s, over-60s and other at risk groups there would be no real barrier (at least financially) for patients. It is also likely that in most cases patients will simply be heading to the next room in any case in a multidisciplinary eye health

care environment.

WORLD COUNCIL OF OPTOMETRY STATEMENT FYI

The Sight Test: Refraction and Examinations of the Eye for the Purpose of Detecting Injury, Disease or Abnormality: The Public Health Case

Early detection of disease and abnormalities that can only be detected through a comprehensive eye examination that includes an ocular health assessment is essential for public health as late detection increases the likelihood that irreversible damage will have occurred¹.

The World Council of Optometry believes that refraction should not be offered as a 'stand-alone' service even in areas where there are high levels of sight loss through refractive error. The optometric workforce needs to be developed globally, allowing scarce and more expensive ophthalmology resources to be directed at areas where medical intervention is necessary.

Patients who have a 'refraction only' service may assume their eyes have been examined to see if they are healthy. A comprehensive eye examination also includes an assessment of how both eyes work together and a full eye health assessment, as well as refraction. In addition to examining the health of the eyes, this assessment may identify other health issues that include, but are not limited to, injuries, certain neurological disorders, high blood pressure and diabetes.

There is evidence that signs of treatable retinal and posterior pole eye disease are more likely to be detected during procedures conducted as part of a comprehensive eye examination.^{2,3,4,5}. While some of these diseases may be accompanied by symptoms of visual loss or disturbance others may be symptomless^{3,6,6}. It has been suggested that glaucoma detection could be improved by increasing the general population's participation in eye examinations⁷.

Eye health is too important to take any unnecessary risks. The World Council of Optometry believes that safeguards to prevent stand alone refraction would serve patients well and reduce the economic cost of avoidable blindness to individual patients, as well as to society.

1 Sinclair A, Hinds A, Sanders R Ten years of glaucoma blindness in Fife 1990-99 and the implications for ophthalmology, optometry and rehabilitation services Ophthalmic Physiol Optics 2004

2 Harrison RJ, Wild JM, Hobley AJ. Referral patterns to an ophthalmic outpatient clinic by general practitioners and ophthalmic opticians and the role of these professionals in screening for ocular disease. BMJ. 1988 Nov 5;297(6657):1162-7.

3 Pierscionek TJ, Moore JE, Pierscionek BK Referrals to ophthalmology: optometric and general practice comparison. Ophthalmic Physiol Opt. 2009 Jan;29(1):32-40.

4 Port MJA. Referrals and notifications by optometrists within the UK: 1988 survey Ophthalmic Physiol Opt 1989;9:31-35

5 Hobley AJ, Woodward EG, Port MJ. Retrospective study of optometric referrals. Ophthalmic Physiol Opt. 1992 Oct;12(4):395-9.

6 Sommer A, Katz J, Quigley HA, Miller NR, Robin AL, Richter RC, Witt KA. Clinically detectable nerve fiber atrophy precedes the onset of glaucomatous field loss. Arch Ophthalmol 109:77-83, 1991

7 Burr JM, Mowatt G, Hernández R, Siddiqui MA, Cook J, Lourenco T, Ramsay C, Vale L, Fraser C, Azuara-Blanco A, Deeks J, Cairns J, Wormald R, McPherson, S, Rabinathan K, Grant A. The clinical effectiveness and cost-effectiveness of screening for open angle glaucoma: a systematic review and economic evaluation. Health Technol Assess. 2007 Oct;11(41):iii-iv, ix-x, 1-190.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Currently many, often elderly patients, are forced to duplicate their eye healthcare appointments unnecessarily. Take my elderly aunt for example - she is under the hospital for diabetic eye disease monitoring and intravitreal injections for age-related macular degeneration - she sees eye healthcare professionals approximately every 2 months. Why then does she need to have a full eye examination at the opticians when she only wants a refraction?

It is a particular problem for patients and dispensing opticians engaged in low vision work and specialist contact lens work where the waiting list might be 18 weeks for an appointment (and in the post covid world much longer). Currently there is a high likelihood the prescription might have changed in the intervening period and currently technically although the dispensing optician is entitled to refract to confirm the prescription, and is perfectly capable of determining the new prescription if there has been a change, they are not allowed to prescribe and must refer the patient back to the optometrist for a new prescription. The patient then goes to the back of the queue for their low vision and / or specialist contact lens appointment and has to wait for months for another appointment. In reality in my experience DOs ignore the letter of law in the best interests of patients to save these vulnerable people being without up to date vision correction for any longer than is strictly necessary. Often they will get an optometrist / doctor to "sign off" on their change in Rx (despite the fact that the GOC statement says that refraction cannot be delegated), but the signatory will not in my experience physically check the accuracy of the refraction which rather proves the point that dispensing opticians should be allowed to refract independently.

In the case of GOC v [redacted] it was agreed that he was entitled to refract and acknowledged that he had conducted around 50,000 refractions in the decades following him completing the "delegated functions" course at City that was at the time supported by the College of Optometrists. Although one of only a few dozen people to complete the course the fact that there had been no complaints about the accuracy of refraction, or evidence that the results were inaccurate, also demonstrates that DOs are perfectly capable of refracting patients in their own right.

It is also well known that refraction is not rocket science and can easily be taught in 6 weeks or less. Programmes to increase the numbers of nurses and technicians capable of doing refraction in parts of Africa supported by charities such as Vision Aid Overseas and other charities report theory and practical training to be completed in around 80 hours, though in my opinion these training courses fall short in terms of ocular motility / muscle balance and could be improved. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4911439/>

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The current legal definition of a sight test is not helpful and prevents high quality care in many circumstances as some practices / practitioners are able to use it as an excuse not to invest in the latest equipment and just do the bare minimum that they have done for decades. These practitioners would be better working as refracting opticians (alongside a new breed of refracting dispensing optician) and leaving the eye healthcare to those who can do it properly. The UK as a whole needs to specify standards for optometric and refraction services as has been done in Scotland to ensure that when patients want to avail themselves of eye healthcare they are getting it to a consistent standard - not to a bare minimum that was specified in 1958 - but to a level that reflects current technology and population needs.

Many optometrists in my experience are also forced to cut corners to save time, and an unwillingness of companies to spend time with unproductive patients (many ration childrens and NHS appointments) also causes problems. For example my own daughter has been suffering from dizziness for over two years which turns out to be vestibular neuritis, however the doctor wanted her to have a sight test including binocular vision check. Her first test, with a locum at a large multiple did not include any assessment of motility, binocular vision or accommodation despite this being specifically requested when the appointment was booked. When this was brought to the attention of the optometrist as she handed over the prescription for glasses (at a level below what the college guidelines consider to be worth prescribing) she did a cursory cover test and said everything was OK which it clearly wasn't.

A second opinion was sought and the situation explained. At this appointment the optometrist had clearly decided cycloplegic refraction was necessary and had drops in before we had even signed the GOS "form". Paralyzing accommodation in this way makes it impossible to measure any insufficiency or to properly assess binocular vision (BV) at near, so a third opinion was sought. Finally we found an optician who was able to conduct a full BV assessment and prescribe exercises, and prismatic lenses if this was unsuccessful.

Currently Section 5 of the Opticians Act allows the GOC to make rules relating to Orthoptics. This should be used to allow dispensing opticians to carry out school vision screening and binocular vision assessment.

My other daughter, then aged 3, failed nursery school vision screening - amazing what happens when you live near an orthoptics training establishment - screening of 4-5 year olds has stopped in most of the England but my daughters have been screened several times.

It took exactly 18 weeks to get an appointment at the local eye hospital (the only choice given by the screener). We had been quoted 9 months but the hospital was ordered to get its waiting lists down. We attended a catch up clinic on a Saturday morning and there were 120 people in the waiting area. We checked in then waited 30 mins to see the orthoptist who took 30 minutes to measure visual acuity. Another hour to get drops, which take 30 minutes to take effect, then 10 minutes with a consultant ophthalmologist for refraction and fundus examination. This 3 hour session, which could have been done in 45 to 60 minutes in an opticians, or two 25 minute appointments on different days which is often preferable for a 3-year old, resulted in a prescription for glasses and required a trip to the opticians anyway and could have saved 18 weeks.

Currently we have rules that apply to opticians that don't apply to hospitals which leads to inefficiency across the sector. Proscribing what MUST be in an eye test leads to a bare minimum of care being provided in some instances and in other cases wastes time on refraction when what the patient needs is an emergency eye health assessment. We also have a postcode lottery for school vision screening and access to primary care eye health services outside of GOS. Separation of the sight test into eye health examination and vision and prescription check would allow for a consistent nationwide nationally commissioned primary eye health system to replace the postcode lottery of Minor Eye Conditions Services (MECS), Primary Eyecare Acute Services (PEARS), and Covid Urgent Eyecare Services (CUES). Only then can optometrists take away some of the burden that ophthalmology is unable to cope with. The RNIB and Healthcare Safety Investigation Branch (HSIB) say unnecessary delays cause unnecessary blindness.
<https://www.hsib.org.uk/news-and-events/latest-hsib-report-highlights-devastating-impact-of-delays-and-pressure-on-national-glaucoma-services/>

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We are stuck with an old fashioned system in England that does not ensure patients receive a consistent level of either refraction or eye health examination. It does not help patients obtain timely treatment / assessment in secondary care or reduce the burden on the NHS and arguably leads to preventable blindness. It also does not give patients freedom of choice to have their refraction where they purchase their spectacles, low vision aids or contact lenses and leads to unnecessary delays if patients have to be re-referred back to optometry. Much "supervision" of refraction is in name only in the hospital sector where it is allowed to be done by dispensing opticians, orthoptists and nurses - these people should be trained and qualified, registered and accountable in their own right if they are in fact doing the work unsupervised.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

This data should be available from the NHS / GOS statistics. In a small multiple out of 50,000 tests per year we used to refer around 1.5% of patients who were almost all over 60. In a national chain conducting millions of test a year the percentage was similar at between 1 and 2%.

With better business regulation you could compel business to collect this data (you could also ask the NHS to collect it) so that public health outcomes could be effectively monitored.

The percentage referral rate varies according to the demographics and the commissioning of enhanced optical services. In areas with no enhanced services referral rates and an elderly population referral rates are around 4% in my experience. However in areas with a full complement of Enhanced Optical Services including MECS, PEARS, Glaucoma Referral Refinement, Cataract Pre-op assessment the referrals are greatly reduced but these appointments can take up to 10% of sight test capacity to fulfil. Referral low vision services is almost non-existent in my experience and low vision is the least commissioned of the enhanced optical services despite the RNIB estimating that 2 Million people are living with sight loss.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

The European Council Of Optometry and Optics produces its Blue Book that itemises the scope of practice for different countries. Most of Europe operates a model where refraction and spectacles are obtained from one establishment and eye health examination from another. In some countries such as France refraction by dispensing opticians is the norm though I believe technically illegal. There is no substantial difference in preventable sight loss in these countries I believe.

The current refraction at most establishments does not include state of the art autorefractometry including wavefront aberrometry, topography and axial length measurement. It also does not include comprehensive binocular vision assessment. For some patients with special requirements separating refraction would allow dispensing opticians to specialise in helping people with specialist refraction needs such as those in the early stages of keratoconus, undergoing treatment for early onset myopia, or with ocular aberrations that can benefit from iScription type personalised lenses even in single vision, or with low vision, to ensure the appliance provided meets the patients exact needs.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It is unclear at present whether the "teach" is part of fitting or part of aftercare and whether or not it can be supervised by any registrant including a DO (which is my understanding of the law having taken advice and having practised this way for over 30 years), only a CL practitioner, or does not need supervising at all. All three modes of practice are in common operation.

The process would also be much more efficient if contact lens opticians, who are duty bound to verify the refractive status of the eye could actually prescribe the changes they find. Because they are already trained in refraction they could also easily prescribe glasses which would make it easier to persuade people who overwear lenses because they have no glasses to invest in some as it would remove one of the barriers to this currently (i.e. another appointment / expense / inconvenience). CLOs would need to increase the amount of binocular vision assessment as this isn't something they do at all in my experience largely because BV issues cannot really be corrected with contact lenses.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The only downside really is that the law remains unclear in relation to the supervision of "teaches" (insertion, removal and handling instruction) but I guess since this has never been tested in court it isn't really an issue, but it is a potent source of disagreement at CPD discussions.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

According to the GOC Rules on Supply 1984 (and the associated British Standards - specifically British Standard 2738 Note 4 in the introduction) all patients whose Rx is over +/-5.00D require a vertex distance to be measured on the frame they have selected, which must then be compared to the vertex distance of the refraction (trial frame or phoropter) and where there is a difference the prescription recalculated and compensated so that the patient experiences the same effective power at the eye. Currently 99% of non-registered dispensers are incapable of making this calculation and unaware of this requirement. Online sellers are also unable to take this measurement because it would require the frame to be on the patient's face and the measurement needs to be taken from the side - it cannot be done by the patient looking in the mirror, or holding a credit card to their forehead, or even as yet by highly sophisticated 3D scanning apps used on the latest iPhones with 3 cameras built in. Therefore patients whose Rx is over +/-5.00D in the highest principal power meridian (and including any reading addition where applicable) should be afforded the protection of being dispensed by or under the direct supervision of a registrant.

This would be best accomplished by simultaneously reviewing the GOS Voucher values so that the cut off points are at 5.00D and 10.00D only instead of the current 6.00D, 10.00D and 14.00D. This would reflect the higher level of skill required on prescriptions over 5.00D and also that lenses over 10.00D all cost the same these days since the market has contracted due to the advent of post-cataract intraocular lens implants replacing the need for well over 90% of positive powered lenticular lenses.

If the cut of at 5.00D was considered untenable then a cut off of +/-10.00D (the current level of complex lens voucher that entitles all patients to a reduced NHS voucher regardless of income) would make sense. This group of patients are particularly likely to receive poor service and spectacles that are not fit for purpose.

I would extend the restricted categories to include all vulnerable adults especially young adults up to aged 25 in special school environments and elderly patients in care homes. I would also like to see home visits for the purpose of delivering / adjusting glasses carried out by a registrant. A good proxy for "vulnerable" is being entitled to a GOS voucher towards the cost of glasses as by definition these are children or people in receipt of benefits which makes them particularly vulnerable to financial abuse especially if seen in their own home. Since most voucher patients are able to get "free" glasses from the majority of optical practices financial abuse would be unlikely.

On the subject of financial abuse over my career I have seen many people, including registrants, dismissed for dishonesty and theft. However I have also seen "nice" bosses decide not to prosecute, or in the case of registrants inform the GOC. Usually a future employer calls for an off the record reference check and asks a direct question about the person's honesty, and sometimes I read about them being struck off by the GOC in Optician a few years later. I would like to see the GOC place an absolute duty on employers and registrants to inform them of dishonest staff, including those that are not registered, who can later enter training and become registered in my experience. This would also solve the problem of the current NHS provision not being joined up across the nations (although registrants of a different type (i.e. on the sexual offenders register) living in Edinburgh and working in England does tend to set off alarm bells:-)

There is also around 1 million low vision patients whose vision isn't "bad" enough to warrant registration as sight impaired but who are nevertheless disabled by being no longer able to drive or see basic things such as food packaging even with their spectacles. To provide such protection to these patients it is not just a simple matter of restricting function. This also requires a fundamental change as to what is included BY LAW on the prescription the patient can take from one practice to another. This MUST include Best Corrected Visual Acuties so that the dispensing optician can assess whether the appliance they have supplied is actually bringing the vision up to what is expected. This will be vitally important when dispensing opticians are refracting to as it provides an important benchmark for the eye healthcare provider as to what has been achieved previously.

The provision of visual acuties on the prescription would benefit all patients and also prevent a good deal of complaints and misunderstandings currently referred to the OCCS. Patients with untreatable pathology are sometimes under the illusion that their new prescription will restore their visual acuity to previously achieved levels when this isn't possible. If the dispensing practice had this information these complaints and patient inconvenience could be avoided. This of course presupposes a person who understands visual acuity is dispensing the patient rather than an unqualified person with little training. If we can't further restrict on the patient side it might make more sense to reregulate the dispensing of spectacles full stop, OR, to ensure that all dispensers are qualified to a certain extent say at level 2, 3 or 4 using existing qualifications and apprenticeships.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I don't see any real disadvantages to patients - voucher patients and current vulnerable groups spend the least and the voucher system effectively prevents the sector overcharging. Of course opticians will probably object especially if they are simultaneously forced to stop rationing provision to vulnerable groups at the same time. The main advantage is it will improve outcomes for patients with higher prescriptions, and / or lower levels of best corrected visual acuity whose needs are more complex.

I have personally seen remake rates of 12% across a chain with hundreds of "stores" and been responsible for bringing this down to around 4%. Imagine if 1 in 8 new cars broke down or 1 in 8 burgers gave the consumer food poisoning - there would be a national outcry. But 1 in 8 pairs of specs not being fit for purpose? Its OK they can get a refund or get a new pair free of charge - never mind the time, travel, parking, money, lost income etc they have had to endure and the fact that they then have to often start again and find a new optician. In CPD events an undergraduate lectures people often report return rates of over 10% and sometimes as high as 20% - this is scandalous and would be greatly improved if dispensing opticians actually did dispensing instead of dealing with "visual concerns" after the patient has collected. Surely it is better to get things right first time?

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

The current problem is that the law is an ass because it is so unclear. Essentially providing the consumer has an indate specification for any old lens they can order a different lens to a completely different specification - if this wasn't true [redacted] wouldn't be advertised on London Underground and able to offer their lenses as equivalent to any lens on the market. I've supervised or been the "generally directing" practitioner for several direct to consumer contact lens businesses since the early 1990s and the only way to make a profit is to ignore the rules on verification - what's the point of verifying if all you are checking is the date and not the lens specification? The verification rules are unworkable if taken to the letter of the law which demands sight of the original copy or a physical conversation with the actual prescriber. We broke those rules by insisting on a fax / email scan of the copy so we could be sure we were supplying an equivalent lens whereas other suppliers supply a completely different lens. Many suppliers also have no verification whatsoever trusting the patient to enter their Rx accurately even though the GOC's own data (shared on the Love your lenses working group, possibly derived from AOP) showed that 8% of patients had self prescribed based on their spectacle prescription. No matter that contact lens related keratitis is the leading sight threatening cause of attendance at eye A&E.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

If the rules were made clearer and tightened up as mentioned then harm would be dramatically reduced. It is not appropriate for me to have a prescription for painkillers and use it for antibiotics, why is it appropriate to have a prescription for [redacted] and use it for [redacted] ? The main change should be that the specification is scanned and uploaded to the website (in addition to manual data entry) and that it is stored by the supplier and the specification verified before despatch. The supplier should be a business registrant too so that they can be audited and sanctioned if necessary. Foreign businesses need also to register. ALI should be able to show a GC charter mark to add assurance.

The general direction rules are ludicrous - they may as well not exist - but they really should and must be tightened up. I've been a "general director" several times, writing standard operating procedures and providing training etc. There is no obligation for this person currently to be named, no obligation for them to have additional liability insurance. What happens when they fall out with the proprietor and leave - are they still liable? Does their professional body know what they are doing / have done and would their liability insurance through ABDO / AOP / FODO pay out in the event of a claim? In my career I've witnessed completely wrong lenses sent out and patients have an accident as a result, hundreds of people shipped the wrong disinfection solution many of which burned their eyes with hydrogen peroxide, and huge numbers of patients have serious eye infections as a result of non-compliance. Only a few have lost sight permanently, and then only in one eye, so it doesn't really matter in the great scheme of things does it? The GOC couldn't have prevented these things could it? I mean having someone write the manual and then only get them back after there's an issue is fine. No point having a registrant in charge and on the premises at all times, general direction will do surely - I mean why add £20,000 or £30,000 costs to a £3 Million pound business it simply could afford it.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Verification in the current form encourages people to break the law in the sure and certain knowledge that the GOC will do nothing about it. As stated a scan of the specification should be REQUIRED at the time of ordering, data should be entered manually by the consumer however to save businesses costs, and the order should be checked against the scanned document before shipping. The lens supplied should be an identical product and the only substitutes allowed should be identical products supplied as own label for branded and vice-versa from the same manufacturer. Where products become discontinued then a clinician must be involved preferably to refit the patient, but as a minimum a telephone conversation should take place to explain the risk of substitution, and ideally the manufacturer should have conducted clinical trials that indicate parity of fit.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This would increase the number of people self fitting based on their spectacle prescription and the number changing for example from ultra-high oxygen lenses to ones with much shorter safe wearing times but without actually cutting the time they wear the lenses.

Verification should not mean having the original in your hand or speaking to the prescriber. It should mean the consumer uploading a copy to the supplier's website, but manually entering the data for the order. The supplier should then check against the uploaded Rx before despatch.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

A check up should be a required every 2 years - the CL Rx should have the same validity as the spec Rx but patients advised to have check ups more frequently if advised by their contact lens practitioner.

There needs to be a decision on whether a teach is part of fitting or part of aftercare. In reality suppliers cannot be held responsible for anything other than advising aftercare they can't provide it or accept liability for non-compliance. Patient safety is provided by ensuring the lenses are supplied to meet the exact specification and that the patient has had a check up within say 2 years. The only significant risk is to patients who sleep in their lenses who require much more frequent check ups so maybe the validity period should remain variable but this allows practitioners to get round the rules by putting artificially short dates on which then encourages patients to shop abroad or on websites that break the rules.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Plano lenses need fitting just like Rx ones so if the rules are relaxed for these they should be relaxed for everyone - we could publish Rx tables on how to convert your spec Rx to a contact lens Rx and we wouldn't need fitting at all. People who want plano lenses usually fall into two categories - those who

wish to change their eye colour and wear them full time (these patients tend to be fitted properly, at least after their first adverse incident) and those that want a particular look for a party - these patients are unlikely to go through the fitting process, unlikely to disinfect their lenses properly before wearing again, and highly likely to be under the influence of drink or drugs when using them so that an adverse overwearing incident becomes somewhat inevitable.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

The rules seem stricter (and clearer) on plano lenses than on powered to me, however businesses still need to be registered with the GOC to ensure they understand the rules. You would need to compel suppliers to give you their customer list to do this though as the number of suppliers is immense - joke shops, beauticians, hairdressers, many online retailers, even second hand ones!!!

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Business regulation would solve the problem - the current rules are OK its just nobody obeys them and the GOC does nothing more than (the admittedly quite effective) cease and desist letter. A £50k fine for a hairdresser / beautician would be a serious deterrent and in my experience they are hoodwinked by sharp sales people who neglect to tell them the rules.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is a great shame that these lenses are priced such that wearers are unwilling to pay for fitting / aftercare and opticians are unwilling to engage with a group of patients that provide them with more than their fair share of problems. Most patients learn the hard way and don't wear these lenses again. The legislation is broadly OK, although they are still medical devices so need to simply be brought under the same banner as Rx lenses.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The principle barrier is only allowing refraction to take place with eye healthcare and for the sight test to only be carried out by optometrists and doctors. State of the art personalised lenses incorporating wavefront aberrometry have been around for over 20 years and only a handful of practices are dispensing them whereas on the continent they are a significant part of the market. I have had several pairs of these lenses from different manufacturers and they make a significant difference especially when driving at night when my pupils aren't so small as to provide the improved depth of field / focus that I experience in the day time.

As part of the informed consent process opticians should be informing patients of their best options not just those that fit in with their current business model or the NHS. Wavefront guided lenses offer an extended time in spectacle for patients with advancing irregular astigmatism (such as keratoconus patients) and others with media defects and significant ocular (in eye) aberrations. As a dispensing optician I would like to have a business concentrated on optics without eye healthcare and see eye healthcare stand on its own two feet as a separate entity alongside. At the time my previous employer was considering investing in wavefront aberrometers we conducted a study tour in several European countries including Germany and the Netherlands - although opticians can operate independently of optometrists and doctors many choose not to but the standard model appeared to be for the patient to be seen for a refraction and dispensing by an optician and then referred upstairs / next door for the eye health exam with an optometrist who may be part of the same business or may operate completely separately. In markets with more or less complete deregulation such as the Netherlands (where only professional titles and fundus (back of the eye) examination is strictly regulated) opticians (who refract and dispense) often provide a screening service over and above the determination of best corrected visual acuity. For example they may perform the pressure check and refer patients whose pressure meets the equivalent of the NICE guidelines referral protocol without any attempt to diagnose glaucoma. Similarly patients whose visual acuity cannot be brought up to normal levels, or previously recorded best corrected levels, is also referred. In British Columbia when refraction was legalised there were reports of increased business for optometrists as a result of people availing themselves of typically free refractions and then being referred on.

The current rules on measuring vertex distance which are flouted by almost all online retailers are not a barrier to progress. It is important that patients with high powered lenses have their prescriptions compensated so that their vision is maximised. The rules need to be maintained as technology is being developed so that online sales can be legitimately transacted whilst conforming to the requirements. I am aware of at least 2 companies that are a long way down the route of patients scanning their own faces using iPhone apps and the algorithm being able to accurately determine exactly how the frame will fit on the face, how the lens will fit in the frame and how far the lens will be from the cornea. This heralds a new dawn in legally compliant online sales of bespoke, robotically produced / hand-made frames utilising computer aided design and computer aided manufacturing CAD/CAM technology however

the technology is most likely to be used by dispensing opticians in practice locations with frame material samples to view, feel and try on. I have had a number of prototypes made for me using one of these algorithms and have been impressed by the deadly accurate lens centration and the ability of the app to recommend the best "off the peg" frame and to only recommend a "bespoke tailormade" version of the same frame when it will benefit the patient.

While I am on the subject of "tailormade" at least one large chain of opticians uses this term to describe progressive lenses that come in a variety of corridor lengths, whereas others use it to describe lenses that have a choice of corridor lengths and insets and can be compensated for pantoscopic angle, dihedral (faceform) angle (wrap), vertex distance and working distance. This is akin to saying suits that come in short, regular and long fittings are the same as a Saville Row suit tailored for every detail. Terms should be laid down in British Standards (and European Norms / International Standards). BS EN ISO standards exist for every aspect of our work including defining the terms we should use (e.g. BS EN ISO 13666) I'd like to see this upheld in terms of the advertising and terms we use in practice. The [redacted] and [redacted] case on BBC Watchdog is a case in point when description of blue light lenses went off-piste and damaged the reputation of the professions in the eyes of the public even though the individuals concerned were unqualified unregistered optical assistants. There is still a tendency in some businesses for assistants to make it up as they go along in order to get the sale and meet the target but nobody seems to care if the patient does not belong to a restricted category.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I don't think there is any significant risk to the consumer if dispensing and refraction were carried out separately from the eye health examination in some businesses as they currently are in secondary eye healthcare settings. The only significant risk is the silent stealer of sight - glaucoma - since it is asymptomatic until vision is permanently lost and it has been argued that patients having a refraction with a dispensing optician might not get a full eye health examination. This can be mitigated by refracting opticians providing eye healthcare information BY LAW to their patients on the copy of the prescription that they issue, and also ensuring that visual acuities are part of the prescription going forward for all registrants who issue one. The actual risk is no higher than for ready readers - patients self selecting in [redacted] or [redacted] get information advising them to have a sight test with every pair of ready readers. It is funny the World Council of Optometry doesn't have a view on ready readers, but charged with protecting the turf of optometrists suddenly finds the same risk to be unacceptable even though it the default business model in almost all of the non-English speaking world. It seems to me that our rates of visual impairment are higher not lower than other developed nations with refracting opticians and doctors being the default model or this model working side by side with optometry and patients having choice.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Optical appliances are medical devices and subject to strict Standards - the best protection for consumers to buy their appliance from a registered business and all businesses should be registered in some form - even the unregistered currently, though they flagrantly ignore the law, are required to take into account BVD, ensure accurate centration, check prescription accuracy on a focimeter etc by the 1984 rules. I certainly wouldn't want to see this relaxed - indeed it should be more rigorously enforced even against current registrants.

As previously detailed restricted categories should be expanded to take in complex prescriptions, patients with low vision who do not meet the sight impairment criteria, vulnerable adults - especially those seen in their own home, and patient whose prescription requires a vertex distance.

All suppliers optical appliances should ensure their staff who are involved in supply have a minimum level of training which should be a recognised course of study at level 2, 3 or 4 depending on the restricted nature of the patient. Many countries have different categories, for example children under 8 can only be seen by a registrant in person or a trainee optician under one to one supervision, with current supervision rules applying to other restricted groups including the new ones.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

The two year prescription restriction is a good thing, although currently registrants (mainly dispensing opticians) can override this if they feel this is in the best interest of the patient. I think this is a valuable check as it ensures registrant involvement and that an eye health exam can also be advised. When DOs are refracting autonomously and patients are also able to obtain an accurate refraction via their mobile phone or laptop this is still an important check and balance in the interests of patient safety and also satisfaction. Prescriptions do change and if the patient is investing in new spectacles they should want the prescription to be as up to date as possible. In my career over 30 years the number of patients I have seen who refuse to have a up to date Rx amounts only to a few dozen - these are primarily patients who have very high prescriptions and who have not been dispensed properly (i.e. the Rx has not been compensated for a change in vertex distance so their vision has been compromised to unsafe levels). The patient blames the eye test, which is often at fault because the vertex distance isn't provided as it should be by law on prescriptions over +/-5.00D in the highest principle meridian including any reading addition where required. Other times it was the supervision by the sight tester of their unregistered colleague carrying out the dispense and again failing to compensate the Rx because unregistered colleagues are often unconsciously incompetent - they don't know what they don't know. They may be consciously incompetent but decide to get the sale anyway because often the Rx doesn't need compensating and the patient can always get a refund later. I have had a few patients over the years who have had a genuine phobia about being in a room alone with an optometrist,

occasionally even a female one, or a phobia about having their sight tested, and I have been happy to dispense them without an up to date Rx - sometimes as much as 25 years old. Although these patients might be happy to not have these questions they would be put at a severe disadvantage as by definition they are vulnerable in some way, need to be consented properly (i.e. informed of the much increased risks that an eye condition might go undetected), and often have complex dispensing needs best dealt with by a registrant in a face to face environment.

Having said all that if restricted groups were extended to include all voucher patients and all patients requiring a vertex distance according to the 1984 GOC Rules then I think this restriction could be removed for everyone else except possibly the over 60s since they are at greatly increased risk of sight threatening eye disease. The current ability of a registrant to override the rule is useful in an emergency where specs can be supplied and the sight test performed later - this doesn't happen often but I have on many occasions supplied spectacles to Px on holiday who has lost glasses, or to hospitalised patients and residents of care homes whose glasses have been mislaid / broken beyond repair (in an accident or by staff) and needed correction urgently.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If the restricted categories were expanded to include all NHS GOS voucher patients and all patients requiring a vertex distance then there would be few downsides. Ultimately this is no different to the situation with ready readers so although there is a very real risk the financial savings of the many outweigh the preventable visual impairment and loss of independence of the few, this risk is probably worthwhile if it is considered that increased disability and financial burden on the state is a price worth paying for increased convenience and possibly reduced price for a tiny minority of consumers

I have personally seen several emmetropic patients who have lasted until they have a permanent vision loss before having a sight test having relied upon ready readers once they became presbyopic. They feel all they need is an sight test for some "proper" glasses, maybe now for distance as well as reading and all will be well. The reality is somewhat different and 2 Million people in the UK live with sight loss as a result.

Some conditions are silent stealers of sight - notably glaucoma which affects over 2% of over 40s, rising to over 10% of over 75s.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7769798> . I can well remember a 60 year old coming in recently boasting how he was going round getting all the free stuff he was now entitled to and proudly stating he had never paid for an eye test (i.e. never had a sight test) his whole life as he had used ready readers but they weren't up to scratch anymore. Unfortunately he now needed his newly acquired free bus pass as we had to inform him he had already lost so much of his field of vision due to glaucoma he wouldn't be able to drive any more.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Overall the current system works quite well and has a good balance between patient safety and simplicity of operation. If there were further restrictions on dispensing to include complex prescriptions, other prescriptions requiring a vertex distance, safety spectacles and vulnerable adults in receipt of a GOS voucher, then it could easily be argued that the remaining adult population under 60 are at very low risk of ocular disease and 3 or 4 years would be a reasonable "valid" date. The danger of this is that the NHS might set new rules making the standard recall period say 4 years instead of 2 years which could depress demand for sight tests by 25% to 50% and put lots of opticians out of business. There is also the fact that most people have a change in Rx every couple of years and need a sight test for reasons other than an eye health check, although if a refraction was able to be purchased separately (from a dispensing optician or online provider) this would not matter - a free refraction could easily be provided as part of the spectacle dispensing process and the prescription would be up to date. We would presumably need a system for ensuring patients are adequately warned about the potential for eye health issues, and possibly a requirement for this to have been checked within the previous 2-5 years depending on the age and risk profile of the patient (2 years by default, and say 5 years for adults between 16 and 40)

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

This legislation (Opticians Act 1989 as amended 2005 Part IV, section 27 (2)(b) is little understood and has served to put opticians off supplying these appliances for fear of falling foul of the law. As someone involved in sports with children 4 to 6 times per week I see kids playing football etc in standard spectacles all the time and it is an area where greater provision and awareness of the risks is required.

My understanding is that sports eyewear currently enjoys a greater state of deregulation for adults but not for children and that sports eyewear can be provided using modular systems of best spherical correction (common in swimming goggles for example). This is best done by registrants, whether for children or adults, as it enables allowances to be made for difference between the eyes even if astigmatism isn't being corrected. It would be worth separating out swimming goggles (where vision is compromised anyway by being underwater, best correction is adequate, and the PD can be altered by adjusting the bridge) and sports specs with high wrap and impact resistant requirements as these are complex appliances and require additional in person measurements. In fast paced sports like squash, badminton, football, cricket it is not good enough to allow approximate prescriptions as it puts the player, and other players at risk of serious injury.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Taking my daughter to football every week for the past 4 years I have seen several sports injuries relating to wearing standard spectacles for football, often requiring stitches and other hospital treatments. There was a well known case in Manchester where the child lost an eye: <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/manchester-fa-glasses-football-boy-15865147> . Squash, badminton, tennis, cricket, golf, hockey etc all pose similar risks and many players do not take this seriously.

At its heart this is a failure of history and symptoms taking by optometrists who spend little time asking children (and adults for that matter) what they do, and a reluctance to talk to parents about sports specs on the part of the dispensing staff because a charge is made when they normally get free spectacles on an NHS GOS voucher for general use.

Currently the NHS will issue a replacement voucher when the child breaks their every day glasses during sport - they would be better issuing children with an additional voucher at the outset for a specific sports appliance and providing the child with the safeguarding from harm that they need. It would be beneficial for children to receive a specific advice leaflet to mitigate risks - this could for example mention risks of sports injury, but also amblyopia and myopia control to ensure consent is properly gained.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Nobody really understands this legislation except for a few rogue online suppliers who are able to sell specs to children by dressing them up as sports eyewear when they are not. It needs bringing up to date and restricting to registrants, certainly for children, and with the exception of modular swimming goggles probably for adults too as the lenses are often highly wrapped and require compensation. Overall this is a missed opportunity for patients to protect their eyes from serious injury that currently most opticians barely engage with - for example one practice I work in orders them in on approval for patients to look at / try on instead of sticking a range that patients could try on there and then - most patients / parents don't bother with this approval process - they are interested in protecting their child's eyes but won't do anything about it unless and until their child is prevented from playing by a referee or coach. The risk of a child playing in ordinary glasses has to be balanced against a child playing without vision correction at all in a dynamic visually demanding sport when the risk of general injury will be much higher without correction.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not Answered

If yes, please give your reasons and provide any evidence to support these.:

Currently despite dispensing opticians and optometrists being the best qualified people to deliver low vision services, and there being 2 Million people living with sight loss in the UK, about 95% of practices do not offer a low vision service. I would like to see practices compelled to help this massive group of disabled people - currently we take their money for 50 or 60 years, then, at the point when they need us most we cut them loose to sit at home on antidepressants instead of helping them in the way only our professions can. Low vision work is time consuming but could easily be made more attractive if there was a nationally commissioned service as part of GOS where patients could be issued with a low vision assessment voucher following a sight test that they could then use with their optometrist or take to a dispensing optician, or sight loss charity or hospital of their choice when a further voucher could potentially be issued for a basic appliance.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients with complex needs, especially those with higher powers requiring a vertex distance will continue to be disadvantaged and put at unnecessary inconvenience, cost and risk of accident. To be fair some of these patients already have the protection of the law it is just that the GOC does not uphold its own rules or prosecute the regular transgressions. The greatest single change we need is for the GOC to have prosecuting powers and be able to make its own rules relating to refraction, contact lenses, spectacles, low vision etc.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I have consulted with several companies that offer scanning technology to use various appliances to scan the patient's face from ear to ear and convert this into lens and frame measurements. I've been involved in focus groups for major lens and frame manufacturers and even for a global merchant bank and a group of investors looking to finance businesses in this area.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I am certain of a few things:

1. Scanning technology, whether freestanding practice based camera systems, or apps on an [redacted] or [redacted], is deadly accurate at taking measurements in three dimensions, with the exception of behind the ears.
2. Algorithms are being developed that can design a bespoke frame to fit the patient's face exactly, or recommend the best off the peg option. They can also measure or determine the vertex distance and compensate the prescription accordingly. This will benefit patients who are very small, large or asymmetrical etc, and especially if used by dispensing opticians will give them new opportunity for better fitting glasses.
3. Online refraction is coming but will always have pitfalls - it is less accurate than an in practice autorefractor but likely sufficient for most adult patients (autorefractors aren't great with kids either because instrument accommodation causes significant inaccuracy).
4. It will be important to recognise that online assessment and autorefractors currently cannot assess ocular motility or muscle balance (binocular vision - how the eyes work together). So whether legalising DOs refracting independently or looking at allowing prescribing based on autorefractor results or supply of specs based on online refraction there needs to be a safeguard that binocular vision is assessed. So for example if DOs get to refract autonomously this must include an assessment of BV, or if online is legalised then it must be subject to health warnings and / or a requirement to have had a full eye examination with an optometrist or a BV assessment with an optician every so often.
5. Online fundus / retinal examination (back the eye) is possible using special [redacted] attachments however some products have been discontinued recently https://peekvision.org/en_GB/about-peek/peek-retina/ probably due to concerns from optometrists / ophthalmologists in the developing countries where they are used being put out of business. In remote areas, including in the UK, the ability to send images to an expert for an opinion is an important means of reducing health inequalities and it doesn't matter from the patient perspective who has taken the picture of the back of the eye, however it is probably best done by an optometrist

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The GOC needs to have independent prosecutorial powers and be able to make its own rules - it is impossible to know what technology will bring. We have seen possible use of contact lenses for the monitoring of glucose levels, slow release of eye medication etc but what else could come and how does this fit in with independent prescribing by therapeutic optometrists, being fitted by contact lens opticians etc.

Additionally anyone selling any optical appliance / eye related medical device / medicine / healthcare product should be registered and thereby punishable by the GOC and the GOC needs to get its house in order with regards to the way the law is written and act quickly to correct mistakes or legal interpretations that are clearly against the spirit of the law, what legislators intended, patient safety and the notion of fair competition.

A simple example is contact lenses: the Act (Part IV, 25 (5) (a)) says [a fitter of contact lenses]... must on completion of the fitting, provide the individual with a signed written specification of each lens fitted sufficient to enable the lens to be replicated...

Section 27 details that this specification must be verified by the seller and yet it is apparently a defence in law to verify the specification then sell a completely different lens providing the patient's specification is in date. This is clearly nonsense and is tantamount to me having a prescription for asthma medication and using it to obtain treatment for eczema.

If there is no will to make the law clear, or practical ability to enforce it, then the market may as well be fully deregulated so that opticians can then compete on a level playing field without fear of prosecution. Orders from any supplier, high street or online, should require the supplier to retain a facsimile copy of the specification or prescription of the optical appliance. There should be no need to see the original or verify with the prescribing practice unless, as is usual with spectacles, the handwriting is illegible or the prescription improbable and not annotated to that effect.

Having coincidentally just watched "shoplifters and scammers" while eating my lunch (Channel 5, 12:15 30th June 2022) it is clear that counterfeit contact lenses are also a much more serious issue than is commonly thought and these dubious supply chains and the ability to supply any lens in lieu of any specification without fear of prosecution just opens even more avenues for criminal behaviour and putting patients at risk. Spectacles and sunglasses are also commonly faked (I once did a research project with BBC Rip Off Britain that showed around 1/3 of sunglasses are fake and that the majority of fakes do not provide UV protection, so, because the pupils dilate behind dark lenses the internal eye is exposed to around 9 times more UV than if no sunglasses had been worn at all.

Compulsory business registration for all businesses selling any optical appliance / eye related medical device would also stop counterfeit spectacle frames and sunglasses businesses and also online optical shops that operate by stealing frames to order for patients. I once witnessed a clone of the [redacted] website in the past purporting to sell [redacted] specs at a fraction of the normal price - it wasn't clear on this occasion whether this was selling and glazing frames stolen to order or was just a scam to get people's credit card details, but making the sale of optical appliances just a little more difficult for us law abiding citizens would be a useful deterrent for the law breakers.

I've supervised, generally directed and advised a number of optical websites and there is no shortage of dodgy suppliers offering "grey market" imports

of supposedly surplus stock which is either stolen to order (because it comes with no cases) or counterfeit (without serial numbers or original packaging) or just plain fake, where a completely random frame has been adulterated with a designer logo. I've worked with suppliers in the past to identify these supply routes and close them down but GOC registration for all websites selling in Pounds Sterling would this much easier and give the patient / consumer the reassurance they need.

The GOC also needs to bring vision therapy and colorimetry under its auspices - currently people get struck off and can open up again the next day offering similar services under a new guise. Behavioural optometry could easily become a specialist register for example. Low vision is also ripe for specialist register status - with the proviso that folk currently practicing regularly could get automatic grandfathering subject to proving they have assessed (say) 50+ patients. Low vision aids incorporating artificial intelligence can now cost in excess of £5,000 and are increasing being supplied by unregistered individuals - the scope for ripping off vulnerable patients is increasing especially when they are seen in their own home. Provision of spectacles on a domiciliary basis should also be done only by registrants - the public need the protection of registration especially if the supplier representative enters patient's homes alone.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

See 47 - currently opticians can't adapt to new technologies for fear of breaking the law so there isn't a level playing field and the unscrupulous are first to exploit this.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

All businesses transacting in £ Sterling, whether online or otherwise, UK based or otherwise, that offer sight tests, eye health checks, refraction, spectacles, safety eyewear, sports eyewear, contact lenses, low vision aids, ready readers, sunglasses, contact lens solutions, eye drops, eye vitamins etc should be registered with the GOC (unless they are a pharmacy for example) so that they can be regulated and if necessary prosecuted, or at the least be struck off the register if they don't comply.

The GOC needs independent prosecutorial powers and the maximum fine for businesses needs to be increased to similar levels as those imposed for GDPR breaches.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

See 47

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

See 47

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Power to prosecute and impose fines on businesses in proportion to those that apply for GDPR breaches. All suppliers of optical appliances to be registered. Vulnerable people to have the protection of being seen by a registrant for dispensing especially if in their own home and especially if the dispenser works alone.

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

It would have been really helpful to have had links to click at each of these questions to take you to the relevant bit of legislation - most people aren't very well up on the specifics of the law, and lay people would have no chance to respond meaningfully to this consultation which has been too short given the

complexity of the questions and the volume of reading required to answer properly.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

All guidance should be reviewed and once we have a new Act all registrants should be issued with an "Opticians Handbook" (as we were in 2005) with the new Act and the main regulations within it - online resources are great but for doing tasks like this consultation this book is invaluable.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

There is scant disregard for the status of many patients who are disabled, particularly the 2 Million or so people the RNIB identifies as visually disabled, most of whom are not registered as sight impaired but lie in between this state and normal vision and are for example no longer able to legally drive or read a newspaper. The vulnerable need greater protection through greater sanction of the use of registrants by businesses particularly when the patient is dispensed, or the optical appliance delivered to them for fitting, in their own home. Doing domiciliaries in the past it was amazing how many people had wads of cash behind the clock on the mantle piece, or just signed the check and left you to fill it out, or got you to count out the money from their purse. Currently the GOC has little jurisdiction over domiciliary businesses where non-registrants attend to dispense and fit or adjust glasses and with franchises increasingly excluding dispensing opticians and optometrists seeing it as beneath them to deliver glasses I fear for the safety and wellbeing of patients who could be befriended and groomed out of their life savings. Registrants have more skin in the game if they can be struck off for life, whereas non-qualified dispensers can start over just as soon as they get out of prison after fleecing a little old lady out of her life savings and depriving her family of their inheritance.

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Student optometrist

If 'other', please specify.:

Part time DO

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Same as it is now.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

DOs can do everything apart from posterior eye examinations and VFs interpretation

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should not be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

DOs cannot conduct a posterior eye exam

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

A contact lens fitting/aftercare isn't exactly complicated.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

A dispensing optician is more than capable of carrying out refraction via an ophthalmoscope or pheropter. This can also be done with a trial frame and lenses. If this is being taught at universities and DOs have to pass these assessments on refraction then it should be no problem for a DO to carry out a sight test. You cannot pass the dispensing degree if you don't pass assessments on refraction objectively and subjectively. Why is this being assessed if you not ever going to use it in practice?

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It will free up more time for optometrists to assess and manage eye conditions, as well as relieving the stress put on HES. IP should be mandatory for optometrist now to alleviate overload on HES. This means this is an excellent opportunity for DOs to overtake the refraction process of an eye examination. I also believe an anterior eye examination should be allowed for DOs as well as contact lens fittings/aftercares.

In addition to this, the business will be more prosperous and will generate more money. DOs can amend rx when necessary for BVD/WD whilst doing refraction.

DOs in today's times are very under appreciated by the optical community at large. This is extremely disappointing considering DOs have also completed 3 years of optical training and have a wide range of knowledge on anterior/posterior eye conditions, able to use a slit lamp and able to refract. It's unacceptable that a DO is assessed on these aspects but can't use them in practice. DOs have now become sales people and are underpaid for their

contribution to the company, because our skills are not valued.

I cannot think of one disadvantage.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

DOs will continue to be under appreciated.

You will not have many DOs soon.

The salary's for a DO is far too low.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It's easily achievable for DOs. Again, this can really free up an Optom's time.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

More stress on Optom's.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

N/a

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

N/a

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

N/a

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Should be aware of handling/insertion and care before giving out CLs

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

More safer

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

No

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Eye should be checked.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Fine as is

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

No

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

No

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

No

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Good

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Good

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Good

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

I take the AOP's view on the matter.

I believe the GOC are responding to business pressure applied through lobbying which will put the public in danger resulting ultimately in more members of the public losing their sight.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

So called 'Pre-testing' ie nct autorefraction oct drp - this should be restricted to qualified registrants only. None-registrants should only be allowed to undertake receptionist information gathering and form filling activities and basic dispensing under supervision. With many yrs or experience I have observed that these employees have been presganged into responsibilities that they neither want or have the trained for. It's time business 'trading' aspect of opticians practice acknowledged this fact.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Optometrist - no restrictions.

Dispensing opticians dispensing of glasses and LVA's only. No refraction.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

So called 'Pre-testing' ie nct autorefraction, Oct and digital retinal photography should all be restricted to OO and DO only.

This is because it is essential that it is carried out professionally and competently trained individuals with the full knowledge of what they doing. This should be relaxed when we have clinically qualified assistants working alongside us eg nurses.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Yes.

Ip, Meccs, enhanced services, glaucoma refinement, children's services.

What is the point of all this further training that has been undertaken over the last decade if these qualifications have no significance?

The risk to the public will be much greater of blindness if these standards are abandoned.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

In 25yrs I have not met any dispensing optician who is willing to take responsibility of refraction.

The sight refraction is intragral to ocular disease detection - fact.

Without undertaking refraction the solving of visual problems and disease detection and ultimately referral to ophthalmologists will break down with the consequence of patient loss of sight - fact.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

See above response - reasons enough. Negative impact.

Businesses might have higher profits. Positive for businesses...

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The NHS will need increase their payment for optometrist services.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Ask the NHS is very significant - I'm sure it's very simple to obtain use the freedom of information act to find out! Surely the goc can do this.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Yes because I'm telling you 20+ yrs of experience and feedback daily at work communication from hospital and patients - often NHS h.e.s. doesn't reply because of the defunct communication between us and secondary care never finding out the results of referrals...

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Patients would often receive the incorrect contact lenses.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Negative - as patients would eventually end up in hospital casualty eye departments with corneal infections and the possibility of blindness.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Everything the college of Optometrists currently specifies for good practice.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Blindness.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See above

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Remote care should be restricted to very serious situations of national pandemic emergency in risk of cross infection.

I have witnessed many examples during this pandemic over the past 2yrs of remote care resulting in serious consequences for patients that included blindness. Remote eyecare simply is inferior to face to face examination- it cannot and should not replace it unless exceptional circumstances exist.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

1 What is your name?

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

all as currently regulated eg sight testing, contact lens supply etc

7 What activities do you think must be restricted to our registrants?

Please provide details.:

all activities that are currently restricted to registrants

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

no

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Would help but worried about possible health risks

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

better px health checks if stay as current

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

protects the px against unfit practitioners

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

any disabled or vulnerable person

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

better control over supply and registration

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

leave supply and fit as is

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

leav as is but better enforcement required

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

n/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

potential risk to their wellbeing and sight

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

best stay as is to protect individuals

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

potential for incorrect fit, power, centration

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

protection of px

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

leave as is

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

n/a

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

n/a

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight testing

Contact lens fitting

Supplying under 16s with optical appliances

Supplying visually impaired with optical appliances

Selling plano contact lenses

Supplying optical appliances to patients considered to be vulnerable as this requires enhanced skills and knowledge

In my opinion, all the above require trained registrants who have greater communication skills, better dispensing skills, greater medical understanding and much greater decision making skills.

I also believe the GOC should consider a registrants ability to give advice and treatment for myopia management, one of the major developments facing the optical groups.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sight testing

Contact lens fitting

Supplying under 16s with optical appliances

Supplying the visually impaired with optical appliances

Supplying vulnerable groups with optical appliances

Supplying plano contact lenses

Giving advice and treatment for myopia management

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Restrict the supply of optical appliances to groups that are considered vulnerable
The advice and treatment of myopia management

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

We need a consistent approach to business regulation
Maintain the right balance between clinical and commercial incentives
Appropriate operating procedures
Correct equipment maintenance and staff training

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

GOC has strengthened business regulation since 2013 by introducing more comprehensive business standards
Introducing inspections will only increase regulation costs unnecessarily

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

As long as this is under the oversight of an optometrist or medical practitioner, I believe patients will continue to benefit from an eye examination in conjunction with a refraction. This is essential to maintain an eye care system which enables eye and wider health issues to be identified and addressed as early as possible.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

As dispensing opticians already understand refraction from their initial training, they would require limited enhanced learning to update and maintain this knowledge.

If dispensing opticians support optometrists in carrying out sight tests this will enable us to be more flexible whilst still maintaining a complete sight test which I believe should involve a refraction and an eye health examination.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Vulnerable groups such as those with learning difficulties or dementia
These require the enhanced skills and knowledge of a registrant

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better communication skills

Dispensing skills such as facial characteristics and posture

An understanding of medical conditions and their impact on vision and behaviour

Judging the decision making capability of a patient

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not Answered

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not Answered

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not Answered

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not Answered

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The restrictions protect the public

The fitting process is essential and can be as complex as fitting spectacles or contact lenses, in many cases more complex

In order to provide maximum protection, the correct fitting is essential

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Tell us who you are

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

Dispensing and Contact Lens Optician

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Non registrants should be restricted /prevented from doing the work of a qualified registered dispensing optician , to protect the public and ensure the public receive the best quality dispense. Less emphasis on pushing sales, but more patient centred, in order to receive the best quality spectacles. Qualified registered Dispensing Opticians should be the only ones, looking after the Dispense on hand over from Optometrist/ Ophthalmologist Contact Lens teach of insertion / removal and lens care, should be all done at time of fitting by the CLO and followed up at aftercare.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Registrants should be restricted to their scope of practice

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Registrants should work at what they are qualified to do and not be interfered by non registrants , due to financial pressures within businesses. Work should be spaced to enable all registrants to look after the patient entirely, to ensure the patient receives the best care.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

It would serve the public well if Registered Qualified Dispensing Opticians were enabled to carry out refraction particularly those working alongside Ophthalmologists, who are not undertaking refraction anymore. This is creating a lot of stress to Registered Qualified Dispensing Opticians and their patients presently. The Qualified Registered Dispensing Optician, has to employ the services of a Registered Qualified Optometrist to refract in order, to obtain a prescription to dispense . From the public point of view , they see three professionals before getting their spectacles/contact lenses. In some incidences this puts an extra unnecessary cost on the patient to obtain their prescription.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Definitely it would assist to have "powers of inspection", as a deterrant to those, challenging the law

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

Yes! Business should allow Registrants work without any ethical interference. Time to complete their tasks should be reviewed, and allotted proportionally for the patients best interest and not share holders interest. This may involve smaller practices to reduce overheads , to benefit the patient's care. Presently feedback from patients, is that we have lost that personal touch and those working on the practice dispensing area, are like shop assistants pushing sales, without that patient's interest at heart.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

Yes! As before this would help patients get their prescription for dispensing without having to go through a full eye examination with an Optometrist, if they had already seen an Ophthalmologist.

Additional to the refraction the Dispensing Optician should do pre screening with Tonometry and if possible OCT.

If no underlying issues patients should be seen by Optometrist/Ophthalmologist every two years and more frequently if there are issues to be managed. However if a patient needs spectacles made up and not due a full eye examination, has no problems, then the Qualified Registered Dispensing Optician, should be in a position to refract.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Definitely there is a financial saving to patient in not having to pay twice. If seen by an Ophthalmologist and not issued with a prescription and then seeing an Optometrist to get a prescription and then on to the Registered Dispensing Optician for the spectacles. Three appointments when only two required or maybe one appointment if Ophthalmologist works in same location as the Registered Dispensing Optician.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The sight testing legislation is important that patients are seen regularly to detect any underlying issues early and intervention put in place promptly.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Due to the evolving situation whereby Ophthalmologist are no longer undertaking refraction, even though it is a valuable part of the examination, changing the legislation to include Registered Dispensing Optician refracting, would be a positive step.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Depending on the age profile. Find with the increase in longevity, 50% of older patients need referring, where they haven't been checked for some time. This often results out of fear of a financial burden to not engage with their opticians. The retail hard sell tends to put patient off, seeking regular eye checks. Also over 80% of the younger working population in the tech industry needs Dry Eye Management and often seek eye check due to eye discomfort.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The inclusion of plano prescription lenses in legislation, is a positive step, as this can be an area which is abused by those for profit on young people with no knowledge of the potential harm they are at. Even some people involved in the film sector are quite ignorant in their knowledge of contact lenses and potentially could do harm using lenses on actors/actresses without proper management. Again a lot of this occurs to cut back on costs.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protection for the public would be the main disadvantage, if left unchanged

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes - please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

The sale and supply of optical appliances should be restricted to Qualified Registered Opticians for young people to ensure they get the best appliance suitable for their needs.

Also visually impaired would be better served by being dispensed by their Qualified Registered Dispensing Optician than by the unqualified

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would benefit vulnerable patients as their dispensing would be carefully managed by a qualified Registered Dispensing and mean they would be safeguarded against financial exploitation

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

In fact the supply of contact lenses to the patient, should be tighter, in that those fitting patients, actually give lenses to patient directly, verbally repeating the care and wearing schedule and not have supplied directly from manufacturer

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

If the supervision relating to sale of prescription contact lenses changed away from the Qualified Registered, the patient is more at risk from poor fitting lenses and poor adherence to cleaning schedules

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Very important that contact lenses go through the regulatory process before patient takes away lenses to wear

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The removal of requirement to verify contact lens specification would increase the risk to patient of incorrectly fitting lenses, creating more people to drop away from lens wear due to discomfort.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Definitely! Also the Qualified Registered Optician that fits the patient, should follow through in the teach and aftercare. This puts an emphasis on the importance of the wearing and care of the lenses. Whereas the passing of this procedure to unqualified member of staff, gives a negative vibe to patient of the unimportance of the process.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

This ensures the sale of contact lenses is completely protected and patients fitted correctly and safely monitored

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

If the sale of zero powered contact lenses is not treated the same as prescription lenses , the public is at risk to eye infection through poor hygiene, ignorance re wearing of lenses.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Anyone intending to wear contact lenses zero or powered, requires suitability check for contact lens wear, fitting , tuition on care of lenses, and wearing schedule with follow up aftercare

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

More incidences of eye insult, possibility ending up in A&E, which would be avoided if properly managed from the start

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Strict control on sale and supply of optical appliances, is important for care of the public. Public need the assurance that what they receive is suitable and correct to their needs

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

If removed the public would be put in a position of risk to their health and well being.
Incorrect prescription could trigger off asthenopia, leading to unnecessary medication, causing further health issues.
Badly fitting spectacle frame could develop into skin lesions, requiring medication and taking up medical chair time

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

The sale of optical appliances necessitates obtaining a prescription , which safeguards the patient from any underlying issues going undetected

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

This is very important as without this a non registrant would sell regardless for monetary gain. Fortunately in this country we don't have a two tier dispensing system. Only qualified registered opticians may dispense spectacles and medical practitioners. Those that dispense and are not registered are breaking the law. However this is often challenged.

Patients are the ones that lose at the end of the day, overcharged and poorly fitted

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The danger here would underlying health could go undetected. Danger to a persons future sight.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If legislation remains same, we have the status quo. However is legislation is tightened there could be a redution in chair time taken up unnecessarily. This would result in happier , healthier patients

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No! Terribly important young people fitted with correct optical appliances for sport ,as ill fitting appliances could cause skin lesions, could have them remove protective wear leading to ocular insult. Illfitting appliance could obstruct vision leading to sport injury.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Similiar as above. Cost might be less, but risk to injury high if ill fitting appliance

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Issues would remain unchanged but with tigher control on Dispensing of such appliances would be a better sign of duty of care to our patients

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Definitely more control on Dispensing of Optical Appliances would benefit our patients, giving them more comfortable optical wear

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Similiar to above

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Ordering contact lenses on line is a concern, where a different product supplied to ordered

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The risk that fitting is ignored and could result in health issues, e.g. incorrect bridge fitting of spectacle frame causing skin insult, vision discomfort through optical strength effected by back vertex power not taken into account

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Technology requires regulation for the future . If a person can have vision check ,via their computer and then dispensed remotely, there is no input or oversight by the Qualified Registered Optician

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Industry would have to be involved in Regulation as is the Profession.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The risk of illfitting optical appliances, could lead to health issues as previously mentioned.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Awareness campaign by GOC to inform the public of the disadvantages of online purchasing. Making them aware of the purpose of the Act. On line purchasing would be similiar to prior to the Act, and purchasing from [redacted] . Consequences more people go undetected for eye diseases

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

More active monitoring of practices that they are functioning with patient care number1 and profit secondary

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Change in legislation to protect the patient, that only qualified Registered Opticians/Medical Practitioners may dispense spectacles

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Yes more guidance to the public, informing them to use the Regulated Profession for their eyewear needs and why.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Eye examinations

Refraction

Fitting contact lenses

Dispensing to under 16's

Dispensing 'complex' prescriptions

Writing referral letters

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye examinations

Refraction

Fitting contact lenses

Dispensing to under 16's

Dispensing 'complex' prescription

Writing referral letters

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

The restriction to have a majority of directors as GOC registrants to register as a body corporate doesn't reflect many current business models, and therefore allows them to slip through the net of GOC business standards, to a certain extent. To ensure the Act reflects changes in business ownership structure this, needs to change to encompass any business that sells prescription optical appliances, and to ensure public safety.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

It will make business owners more accountable, and responsible, especially those who aren't registered as body corporates.

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

This seems like a sensible approach, and should ensure that all business premises that sell prescription optical appliances/and/or/zero powered contact lenses have a 'responsible' registrant to safeguard safety and standards.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

I'm slightly torn on answering this one. One one hand there is no reason why a DO cannot provide a safe and accurate refraction, provided suitably qualified, without supervision. However, this could lead to two tier eye care where the refraction can be supplied separately without the more clinical aspects of the eye exam, which could lead to an increase in poor eye health due to undetected eye disease, which in turn has huge impacts on public health, quality of life, and an influx of advanced eye conditions into hospital eye departments. I think it's almost inevitable that refraction/clinical parts of the exam will split in time, but it's not in the best interests of public safety and eye care. Despite

advances in technology, we aren't ready for this yet, and should always take the safety high ground.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

This, to me, is an obvious advantage. By delegating refraction to DO's (who have seen much of their dispensing function undermined by technology, and optical assistants, who are increasingly well trained) it will free-up optometrists to enhance the care and services they offer to alleviate pressure on hospital eye departments, and provide more convenient Primary Care settings for more mandatory eye conditions traditionally seen in a hospital setting.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Unsure, but on balance I'd say, yes. It needs to reflect changes in technology and working practices, especially those employed during the Covid pandemic.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Mainly negative impacts as it doesn't allow the profession to be more agile, to move with, and take advantages of new technology. Take a more futuristic approach. How will things change in the next 5-10 years, and how to mitigate for them.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

No

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

No, not off-hand, only for the common sense reasons highlighted above.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Unsure

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unsure

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes - please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

People requiring a carer to be present during the eye exam to ensure appropriate consent and care is taken, and that the carer understands the reasons for any choices/restrictions.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Positive impacts would be improved eye care for vulnerable people who need a carer to accompany them.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Having to revert back to the original prescriber to confirm the specification is a waste of everyone's time. The prescription provided should provide all the information on it already. Patients don't understand the need for it, and it holds up what should be a simple purchase - if the prescription provided isn't suitable then it should be changed.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

Probably not, provided the patient is an existing wearer and can provide evidence of the lenses they purchased successfully, confirm they have no issues with them, and can produce a valid prescription. There are ways around all the to-ing and fro-ing currently needed, which creates an unintended (or intended) barrier to purchase lenses elsewhere.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Provided the patient is an existing wearer, and can provide evidence of the lenses they purchased successfully, confirm they have no issues with them, and can produce a valid prescription. There are ways around all the to-ing and fro-ing currently needed, which creates an unintended (or intended) barrier to purchase lenses elsewhere.

For 1st time wearers, if they don't have the specification, then this should still be sought.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Mainly convenience for all concerned: the patient, the supplier, and the practice staff/CLO/Optom of the prescriber. Patients don't see the need for delays, and all the telephone tennis/requests to speak to the patient by the prescriber (common).

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

I think it should be the responsibility of the supplier to define aftercare based on the wearer/product supplied/wearing regime/risk etc. If there is a definition it'd need to cover all complexities of lenses from daily toric wearers who require solutions, to occasional daily disposable wearers, who are much lower risk supply. As the bandwidth is so large any definition would need to be suitably vanilla as to delegate responsibility to the supplier in any case as to be not too prescriptive when unnecessary.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Zero-powered lenses are a much higher risk as they aren't worn by those used to wearing lenses, and who don't have an aftercare regime.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

It would open-up unscrupulous sellers to sell lenses with impunity, potentially leading to risk of damage/disease.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

See above

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages to customer's eye health, potentially. These need legislation.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

For the reasons stated in the explanatory notes it's unrealistic to police sales from outside the UK, but by changing the registration rules of body corporates to include all suppliers of prescription optical appliances it could clamp down on illegal UK sales.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Regulation is essential to some degree to protect public safety, and to provide confidence in the profession.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

I think the relaxation of this restriction during the pandemic proved that this is perfectly safe, provided the consumer is made aware of the importance of regular eye exams on health grounds. There is no harm in duplicating a pair of the consumers old, broken glasses, for example; all you're doing is providing them with a copy of something they were perfectly happy with.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I think it's for the consumer to decide whether they're happy with their current glasses, even if a new prescription demonstrates evidence for change. For example, this is especially common in the prescribing of reading glasses, where the concept of working distance is accepted at 40cms for all, whereas 'reading' for most people (with mobile devices etc) is actually longer, requiring less magnification. 'Reading distance' should be dictated by the customer, not the optometrist. They may need extra-close prescription glasses for shorter distances, but they're perfectly happy with their older reading glasses.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Inconvenient to the consumer to impose it, leading to the delay in supply of glasses, and in any event, any qualified DO/OO has the ability to use a prescription of any date provided they can justify it's in the consumers best interests, so it's easy to circumvent this legislation, therefore it's unnecessary.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

I think they're adequate as they are.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Without proper fitting/measurements by a qualified person it could be detrimental to the development of their eyes, which could then lead on to ongoing vision problems later in life. Ensuring under 16's are well looked after will give them more confidence to visit the optician regularly when they're older, or parents themselves with their own children.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I can see no disadvantages for under 16's, but some practices might grumble at the time costs vs revenue that dealing with children necessitates.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

No

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No change

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The proliferation of PD measurement Apps which are launched without reference to proving study's into their accuracy - only 1-2 of them are actually any good. Also those who claim to monitor eye conditions such as visual field, amsler grids, and the vision-checker ones which will test V/A. Of most risk are

those from outside the UK who claim (often spuriously) to be able to provide accurate online refraction.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Provided they're adequately tested/approved by the MHRA, and their use is regulated by the GOC (if necessary given additional powers to do so) technology is a good thing, and will make eyecare more accessible, efficient, accurate, convenient for patients, and save time for practitioners. However, technology will always move faster than legislation, so care is needed in this area.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Yes, but with the caveat, at the moment. There should be future changes as the technology is more mature and scientifically proven, but for now, I'd exercise caution or the market will be taken over by overseas start-ups with an eye for profit, not eyes.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

I'd like to see the GOC working with tech developers/suppliers to better understand the direction of travel. Any use of technology is, I think, down to the registrant to decide whether it's appropriate, which could prove problematic, so some regulation, or at least changes to policy/guidance, working with ABDO, College of Optometrists, is needed to protect registrants and the public.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Work more closely with suppliers, those who use the technology, the public end users, and optical bodies to see if anything needs to change. There needs to be a collaborative approach. The tech companies think the GOC is out to prevent them, the optical professions think the tech companies will replace them, but the public has a desire for more tech.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

I would doubt many online suppliers are registered with the GOC, probably due to the restrictions on becoming a body corporate. If these were removed the GOC could work closely with online suppliers to encourage them to be registered, which then mean they could have some degree of regulatory compliance, or even a voluntary code of practice. If they're regulated too much, however, they'll just move offshore, which would defeat the point.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Work closely with them to understand their businesses and encourage them to 'show their working' in how they supervise orders, handle complaints, returns, and aftercare. I think post-pandemic that more would be willing to engage with the GOC, especially as more now employ GOC registered professionals.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Pretty comprehensive already, I think.

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No others I can think of.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think it's good practice to review them all yearly, especially post-pandemic, as things have changed so much.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

1 What is your name?

[redacted]

3 Which category best describes you?

Optical patient

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not Answered

If no, please provide details.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not Answered

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

All citizens should have the right to take full ownership of their health (including eye health), I believe that prescriptions and other similar restrictions should be discarded as they only help companies to profit and take away people freedom of choice! I would like to be able to choose my prescription as I see fit like it already happens in many other countries. Until regulations change to serve the consumer better, several people (myself included), will keep importing glasses and lenses from abroad with the prescriptions they desire, that means not using UK services which hurts businesses and makes it more difficult and inaccessible for the average person.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

All citizens should have the right to take full ownership of their health (including eye health), I believe that prescriptions and other similar restrictions should be discarded as they only help companies to profit and take away people freedom of choice! I would like to be able to choose my prescription as I see fit like it already happens in many other countries. Until regulations change to serve the consumer better, several people (myself included), will keep importing glasses and lenses from abroad with the prescriptions they desire, that means not using UK services which hurts businesses and makes it more difficult and inaccessible for the average person.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

All citizens should have the right to take full ownership of their health (including eye health), I believe that prescriptions and other similar restrictions should be discarded as they only help companies to profit and take away people freedom of choice! I would like to be able to choose my prescription as I see fit like it already happens in many other countries. Until regulations change to serve the consumer better, several people (myself included), will keep importing glasses and lenses from abroad with the prescriptions they desire, that means not using UK services which hurts businesses and makes it more difficult and inaccessible for the average person.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

All citizens should have the right to take full ownership of their health (including eye health), I believe that prescriptions and other similar restrictions should be discarded as they only help companies to profit and take away people freedom of choice! I would like to be able to choose my prescription as I see fit like it already happens in many other countries. Until regulations change to serve the consumer better, several people (myself included), will keep importing glasses and lenses from abroad with the prescriptions they desire, that means not using UK services which hurts businesses and makes it more difficult and inaccessible for the average person.

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

1 What is your name?

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

The [redacted] believes that non-registrants should not:

- Carry out sight tests and contact lenses fittings (to ensure public safety)
- Dispense optical appliances for vulnerable groups: currently children and visually impaired. The [redacted] would argue that a few other groups of vulnerable patients should be added to the current list such as:
 - o Patients with learning disabilities
 - o Patients with Dementia, Alzheimer or Parkinson's diseases
 - o Patients with reduced capacity to consent.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The [redacted] believes that all clinical work (sight testing and contact lenses should be only done by a registrant. The [redacted] thinks that Dispensing of optical appliances should be restricted to registrants for the following groups of patients:

- o Children under the age of 16 years of age
- o Patients with learning disabilities
- o Patients with Dementia, Alzheimer or Parkinson's diseases
- o Patients with reduced capacity to consent.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The [redacted] believes that any enhanced services or clinical work should only be done by a registrant.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

The GOC as a regulator should not be involved with the professional higher certificates diplomas. That role should be left to the College of Optometrist / Royal College of ophthalmologists.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

The [redacted] has read the summary and it believes that it would be better (from patient's safety point of view) if all optical businesses would be registered with the GOC. However, the [redacted] is not sure that the 2013 review is still applicable today and perhaps a further review should take place.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that extending business regulation in addition to those identified in our 2013 review of business regulation will enhance patients' safety and create an even playing field at the optical market if all optical businesses have to register with the GOC.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

It may not be proportionate for the GOC to regulate the profession by inspections where the CQC has exempted primary care optical practices from registering with it.

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that a similar model for optical practices could be useful as it will ensure that the optical practice is run in a way that follows current GOC regulations and there is somebody accountable to ensure patients' safety.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

The GOC believe that “dispensing opticians could undertake refraction for the purposes of the sight test if they are appropriately trained, competent, overseen and indemnified”. The [redacted] has few reservations regarding this:

- o In order to prescribe optical appliances one would need to learn about binocular vision.
- o What framework will be in place with regards to DO training and possibly working first under supervision?
- o The proposed change where DOs could refract should occur where local community services are fully developed as otherwise there will be no need for “free up the time of optometrists to support a wider range of clinical activities” that may lead to optometrists having less work.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that the positive impact in allowing dispensing opticians to refract for the purposes of the sight test are:

- o Free optometrists time to carry out more clinical work
- o Development opportunity for dispensing opticians.
- o Potentially better availability of refraction appointments.

The [redacted] believes that the negative impact in allowing dispensing opticians to refract for the purposes of the sight test are:

- o Non tolerance cases where binocular vision aspects of the glasses prescription were not taken into consideration.
- o If the patient corrected vision is poor due to ocular pathology how quickly the dispensing opticians could book that patient with the optometrist to establish the cause for the reduced vision.
- o The proposed change where DOs could refract should occur where local community services are fully developed as otherwise there will be no need for “free up the time of optometrists to support a wider range of clinical activities” that may lead to optometrists having less work and potentially affect optometrists livelihood.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

the [redacted] believes that carrying out the refraction at the same time or close to eye health check makes sense as only by combining these two elements together, one could have a complete understanding of the patient’s eye health and vision that is achieved by that patient.

If there is a separation between the refraction and eye health check there is the risk of the following disadvantages occurring:

- o New glasses are going to be prescribed for a patient with reduced vision although a referral for cataract / AMD pathology would be more appropriate.
- o Patients will attend for an appointment for new glasses but new glasses may not be able to improve vision further due to pathology but that patient did not book or did not attend an eye health check appointment.

The [redacted] does not see what advantages would be with the separation between the refraction and eye health check.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The [redacted] believes the advantages of sight testing legislation remaining as it is currently are:

- o Enhanced patient safety as eye health check is carried out for every refraction visit.

The [redacted] believes that the disadvantages of sight testing legislation remaining as it is currently are:

- o Increased cost as only optometrists could test sight
- o Optometrists workforce shortages in some area of the country may affect the availability of appointments
- o Less opportunity for DOs to learn new skills.
- o Potentially less opportunity for optometrist to up skill and support secondary care with community optometry services and / or shared care scheme.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

The [redacted] does not have the data you have requested. NHS England (using data from PCSE) may be able to provide the number of GOS sight tests that the patients were referred. Primary Eye Care services or any other MECS/CUES provider may be able to provide the number of patient’s referrals to secondary from its CUES/ MECS services.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

The [redacted] does not have the data you have requested.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The [redacted] believes that contact lenses (as a medical device) should only be fitted by a registrant to ensure patient safety. Allowing non registrants to fit contact lenses could put patient safety at risk which is a significant disadvantage. Possible advantages are the reduced cost of the non-registrant employee.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that the advantages of fitting of contact lenses legislation remaining as it is currently are:

o Enhanced patient safety as only a GOC registrant could fit contact lenses.

The [redacted] believes that the disadvantages of fitting of contact lenses legislation remaining as it is currently are:

o Increased cost as GOC registrants are more expensive to employ

o GOC registrants workforce shortages in some area of the country may affect the availability of appointments

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

The [redacted] believes that the sale and supply of optical appliances should be further restricted to certain groups of vulnerable patients:

o Patients with learning disabilities

o Patients with Dementia, Alzheimer or Parkinson's diseases

o Patients with reduced capacity to consent.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that further restricting the sale and supply of optical appliances to certain groups of vulnerable patients have the following advantages:

o A GOC registrant will be able to adapt his or her communication for patients with special needs

o A GOC registrant will be familiar with patients with special needs (as per College of Optometrists guidelines)

o A GOC registrant will be able to use professional judgement as to what is best for the patient where the patient does not have the ability to make a decision.

The [redacted] believes that further restricting the sale and supply of optical appliances to certain groups of vulnerable patients have the following disadvantages:

o Further restrictions will make the practice operations more complex

o How one could determine that a patient has Dementia, Alzheimer or Parkinson's diseases and as such only GOC registrants could dispense that patient.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

The [redacted] agrees with the GOC that "the requirement for verification of both electronic copies and particulars is outdated and we understand the risks associated originally with this may have changed"

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that there is a potential risk of harm if the general direction / supervision requirements relating to the sale of prescription contact lenses changed

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that the requirements for verification of contact lens specifications creates unnecessary regulatory barriers. Mistakes do happen but in the vast majority of cases there is no need for verification and as such it is not justifiable to follow this protocol.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that the advantages of removing the requirement to verify a copy of or the particulars of a contact lens specification are:

- o To improve efficiency when supplying contact lenses
- o Reduce the time the patient has to wait for the verification to take place.

The [redacted] believes that the disadvantages of removing the requirement to verify a copy of or the particulars of a contact lens specification are:

- o Small risk for the patient where the contact supplied was not the one intended.
- o The audit trail for supplying the contact lenses will not be complete.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

If there is a definition of what aftercare means that will ensure that internet suppliers of contact lenses would need to comply with these requirements and create an even playing field with optical practices on the high street.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

This is to ensure patient safety especially young people who are more likely to take risks.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Zero powered contact lenses are popular with young people as it is regarded as a party accessory. Buying these products from non-registrants means that the patient may not receive any training on insertion and removal and how to look after the lenses. That means an increased risk of eye infections.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Only legislation could ensure that these lenses are sold by a registrant to ensure patient safety.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that the advantages of zero powered contact lenses legislation remaining as it is currently are:

- o Enhanced patient safety
- o Better educated patients.

The [redacted] believes that the disadvantages of zero powered contact lenses legislation remaining as it is currently are:

- o The cost of the lenses will be higher than if bought from non GOC regulated outlets.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The optical market is very competitive and the current regulation ensure patients safety and where possible even playing fields.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The [redacted] believes that if regulation is removed then non GOC registered businesses could supply optical appliances to the public which may not be fit for purpose (for example for driving a car / bus) with significant risks for patient's safety and public health.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Optical appliances have a vital part in ensuring that the patients' vision is corrected to do a particular task and if that optical appliance is not suitable then the patient's vision may not be fully corrected which could lead to road traffic accidents for example in the case of a patient who drives a car / bus/ Lorry.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It may be appropriate at time to dispense glasses for a prescription that is over 2 years old but it is better that a GOC registrant should exercise his or her professional judgment on the matter in order to ensure patient safety.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that the advantages of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years are:

- o There is no need for another optometrist appointment
- o It would potentially cost less.

The [redacted] believes that the disadvantages of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years are:

- o Increased risk of eye disease not detected in a timely manner.
- o Increased risk that the glasses prescription that is over 2 years old may not provide optimum correction for the patient.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that the advantages the legislation remaining as it is currently are:

- o Enhanced patient safety
- o There is the assurance that on the whole only current glasses prescriptions are being dispensed.

The [redacted] believes that the disadvantages of the legislation remaining as it is currently are:

- o Optometrist appointment will be required.
- o There will be a possible delay to the ordering of the glasses.
- o There will be a possible increase in cost.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that one needs to exercise caution when considering this question. It is true that some children's optical appliances (such as ready-made swimming goggles) are not made to the exact prescription and as such could be dispensed by non-registrants. However, to avoid confusion and to enhanced children's safety it is probably best to leave the regulation as it stands today.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that the advantages of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner are:

- o More choice of retailers to buy the appliance.
- o It would potentially cost less.

The [redacted] believes that the disadvantages of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner are:

- o For some sportswear optical appliances (such as squash glasses) the fitting of the glasses is vital in order to provide the eye protection required.
- o There is the risk of harm if some sportswear optical appliances are sold by non GOC registrants.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that the advantages the legislation remaining as it is currently are:

- o Enhanced patient safety
- o There is the assurance that every sportswear optical appliance is fit for purpose.

The [redacted] believes that the disadvantages of the legislation remaining as it is currently are:

- o There will be the need to attend the optical practice to see the registrant.
- o The cost of sportswear optical appliances would be more expensive.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

The [redacted] is not sure if there are other aspects of sale and supply of optical appliances that needs changing.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The [redacted] believes that the advantages of the sale and supply of optical appliances legislation remaining as it is currently are:

- o Enhanced patient safety measures for the current vulnerable groups
- o Optical practices have robust protocols to ensure correct dispensing of appliances.

The [redacted] believes that the advantages of the sale and supply of optical appliances legislation remaining as it is currently are:

- o There may be increased cost for the patient.
- o There may be reduced choice of retailers that supply optical appliances.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The [redacted] thinks one should make the GOC aware of the practice of remote refraction where the patient is being refracted using a computer software and then the vision is checked when the optical appliance is made when the patient is going to collect the optical appliance.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The [redacted] believes that generally the use of technology could assist in patient care when it is done in a reasonable manner. Although remote consultation in ophthalmology could be an option for some patients' episodes, I believe that most patients' episode should be face to face. Using technology to share patients' record will assist patients' care.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The GOC says that "Currently our regulatory powers are based on a face-to-face model of care delivery where patients are seen in the practice and all care is delivered within the UK" The [redacted] understands from this that the GOC has not developed ways to regulate remote consultations (that could be outside the UK). The [redacted] believes that the answer to this question is Yes as remote consultations are commonly used by the NHS and as such it is an option of care that some patients may prefer. The GOC should consider how to develop its regulation powers in order to keep up to speed with remote care.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The GOC says that "Currently our regulatory powers are based on a face-to-face model of care delivery where patients are seen in the practice and all care is delivered within the UK". Remote consultations are commonly used by the NHS and some patients may prefer that option of care. The apparent gap in regulation with regards to remote care could potentially put patients at risk.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

The GOC should consider the following points with regards to remote consultations:

- o When a patient is consulting someone from abroad it should be made clear to the patient that the person is not bound by the GOC regulations (Similar warnings are displayed for saving accounts for Banks from abroad that are not regulated by the Financial Conduct Authority).
- o The patient should be aware of the complaint protocol of the organisation / person that he or she is going to consult remotely.
- o The patient should be aware of the cost of the consultation and how he or she is expected to pay before the consultation.
- o What considerations of software to be used to ensure confidentiality.
- o What considerations are made for recording the consultation and where the recording will be stored.
- o What kind of consultations may be appropriate to carry out remotely?
- o How follow up consultation is going to be arranged?

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Members of the [redacted] have personally seen where patients who bought glasses online could not use them due to incorrect pupillary distance and / or incorrect vertical centration. On line contact lens supplier commonly switch the type of contact lenses. That means that they do not supply the contact lens that was checked by a GOC registrant. Moreover, some online suppliers sell contact lenses well after the expiry date of the prescription. It is well known that patients who buy contact lenses online have more risk of serious eye infections.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

The GOC state at paragraph 52 "The reality is that the enforcement of our legislation relating to sales – bringing a private prosecution in the magistrates' court – is not practicable for an organisation the size of the GOC or in relation to sales in a global online market. Moreover, it is not realistic to expect the GOC to achieve legislative reform that enables us to routinely act against non-UK sellers. De-regulation could be a way to achieve a level playing field if transferring the onus of compliance to the consumer, except for restricted categories, does not expose the consumer to a level of risk that is necessary to be mitigated by legislation."

The [redacted] is not sure how "De-regulation could be a way to achieve a level playing field if transferring the "onus of compliance to the consumer" is going to achieve the desired outcome. If there is de-regulation that should include optical practices too as otherwise the unacceptable situation where online retailers do not follow the GOC regulation and the latter is not able to enforce its regulation and on the other hand optical practices must follow the GOC regulations.

The [redacted] believes that the GOC should make more effort to prosecute online retailers and recover the cost if the prosecution from these retailers are successful.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The [redacted] is not sure if there are any other areas of the GOC current legislation that may need to be amending.

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The [redacted] is not sure if there are any other gap in legislation that may need to be changing.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The [redacted] is not sure if there are any other GOC policies that may need to be amended.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The [redacted] is not sure if there are any other impacts of GOC legislation that may need to be amended.

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Professional/representative body

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Not enough detail

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight Testing as specified in the Act.
Supply and fitting of contact lenses
Supply of all prescription spectacles & safety specs.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sight Testing as specified in the Act.
Supply and fitting of contact lenses
Supply of all prescription spectacles & safety specs.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Supervision of any screening or diagnostic tests.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

We know of no evidence to the contrary

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

The current QiO is sufficient.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

It's in the public's best interest for the status quo to remain as the optometrist is better qualified and fully responsible for the outcome.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantage - none.

Disadvantage - endangering eyesight and putting the public at risk with the consequence to the NHS and increasing the burden on social services.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It protects the public and ensures eye health issues are picked up early (often saving sight) and maximises visual efficiency in the workplace.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage - It protects the public and ensures eye health issues are picked up early (often saving sight) and maximises visual efficiency in the workplace.

Disadvantage - None.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Please refer to our optical bodies and NHSE.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

There are no data as refraction and eye health checks are a single item in the UK. However, a separate refraction is dangerous as it is often just done as an automated function.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The legislation is there to protect the public and ensure the eye is not compromised.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage - protects the public and ensure the eye health is not compromised.

Disadvantage - NIL

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Public protection

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

The degree of change needs to be specified as eye health would be potentially compromised.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Advantages outweigh the disadvantages

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Public protection especially if the Rx has changed

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

It would depend on the proposed definition

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

It depends on the change. Control is needed for these.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Public health and eyesight is at risk with the unregulated supply of these.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Public protection

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Public protection

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

ADVANTAGE - Public protection

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Public protection

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Public protection

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

ADV - Public protection

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Internet & unqualified supply needs to be more regulated.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Dispensing measurements

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

There should be minimum standards of fitting, measurements, observations and verification.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Dispensing of optical appliances should be regulated so only a registered professional can dispense

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The profession has moved on from the term 'sight-test' and this needs to be addressed.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Dispensing spectacles to children
Performing Eye Exams
Fitting Contact Lenses

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Dispensing spectacles to children
Performing Eye Exams
Fitting Contact Lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

They aren't currently trained to do it

If they want to do it they should train to be an optometrist

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Pathology could be missed

There would be confusion as to what sort of test a patient is having

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I Don't know

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Contact lenses can permanently harm the eye. Proper fitting and aftercare reduce the chances of this happening

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Hi quality of care will be more likely to occur

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Children

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The development of children's eyes could've hindered if the spectacles aren't correctly dispensed

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Patients might not be so well looked after and corneal damage might occur

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Checking contact lenses are as ordered is the most basic check

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient dissatisfaction and harm to their corneas

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Potential for harm caused by poor care

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

The system works at the moment

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

There is plenty of competition

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Poorly dispensed spectacles creating problems for patients

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Poorly dispensed spectacles would create problems for patients

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Patients benefit from an exam of there has been change

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Their vision might not be a good as it could be

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

There is plenty of competition

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Possible harm to a patient's eyes or face

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

At least the pd should be correct

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

Things work well

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Deregulation could lead to less sales for qualified opticians, potentially putting them out of business reducing the availability of proper Eyecare

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I prefer face to face consultations

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I don't think remote care can be as good as face to face care

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I don't think so

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

I don't think so

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

I didn't answer yes

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Not sure

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

I didn't

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I don't know

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I don't know

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I don't know

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I don't know

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

- testing sight
- fitting contact lenses
- selling optical appliances to children under 16, including sports eyewear
- selling optical appliances to people registered as visually impaired
- selling zero-powered contact lenses
- advising and dispensing of myopia management products
- instillation of eye drops

7 What activities do you think must be restricted to our registrants?

Please provide details.:

- testing sight
- fitting contact lenses
- selling optical appliances to children under 16, including sports eyewear
- selling optical appliances to people registered as visually impaired
- selling zero-powered contact lenses
- advising and dispensing of myopia management products
- instillation of eye drops
- dispensing and advising of optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

- testing sight
- fitting contact lenses
- selling optical appliances to children under 16, including sports eyewear
- selling optical appliances to people registered as visually impaired
- selling zero-powered contact lenses
- advising and dispensing of myopia management products
- instillation of eye drops
- dispensing and advising of optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

Alongside the latest advances in technology which enables our optometrists to detect eye conditions earlier, prescribing and MECs. The delegated function of refraction to the dispensing optician would create more time for an optometrist to see clinical appointments and spend time checking understanding with patients of the importance of an eye exam. This can only result in early detection and prevention.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The delegated function of refraction to the dispensing optician would create more time for an optometrist to see clinical appointments and spend time checking understanding with patients of the importance of an eye exam. This can only result in early detection and prevention which ultimately would raise awareness of the importance of eye care and the profession.

Oh n the case of newly qualified DOs they would need gain their existing qualification with a full skill set in refraction, communication and referral. For existing DOs this would need to be a bolt on qualification to upskill existing clinicians.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Restricted to those who are vulnerable such communication difficulties, dementia. The skills of our clinicians and knowledge of optical appliances should be valued. Understanding how to communicate with different groups of patients, time and knowledge is often visited CPD (CET) I always learn something new in these types of sessions.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients will always review the brat products which can in some cases enhance the quality of life.

For example the difference between being sat down explained and demonstrated to on how to use eye drops or a magnifier can be a completely different experience to over the counter in a bag and ho home alone to figure it out. It's all about clinicians delivering a great quality of care. That is why we do CPD - we keep learning how to be the best for our patients whoever walks through the door.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Eye health is important and the regulations are there to protect the public.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Ma

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It ensures that patients have a full eye examination which can detect sight threatening conditions earlier ie: prevention.

Also it ensures patients are wearing the correct prescription which is important for quality of life and peoples safety moving around and when it comes to driving too.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages are :

the two year standard ensures that patients have a full eye examination which can detect sight threatening conditions earlier ie: prevention.

Also it ensures patients are wearing the correct prescription which is important for quality of life and peoples safety moving around and when it comes to driving too.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The reason for wearing sort goggles rather than an everyday pair is normally around safety and the glasses staying in place whilst in motion. it is as important as everyday spectacles that they are fitted correctly and the patient is communicate with about usage.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Na

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Na

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Na

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

Agree need looked at and made consistent but not more deregulation

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Eye examination (including refraction), fitting of contact lenses should be prevented. Dispensing of spectacles should be restricted and done at least under direction of registered especially for more complex prescriptions, children, etc.

Non-registrants can be very helpful to carry out ancillary tasks but eg taking notes for emergency triage form - their idea of what sounds more urgent can vary a lot from what might ring alarm bells for myself. The patients also give different stories once they get to speak to the optometrist so need the care of the whole team.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye examination, fitting of contact lenses, refraction.

Optometrist should be free to decide if refraction can be separated from eye examination but only if dealing with eye health problem and it is not appropriate to complete at the time. If refraction is necessary then should include eye health check also.

Staff which have been trained to help with eg pre-screening are very helpful to make best use of registrants time but registrant must put whole thing together. Using the retinoscope for refraction can provide a lot of information about cornea, lens, retinal reflex so should remain part of the examination. I work in an independent so not many activities are delegated. Those who have previously been to a multiple and seen multiple people before getting to the optometrist are not always happy with a conveyer belt approach.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

I think most things should at least be supervised by a registrant. Ready readers can be purchased in a lot of places - I think these should have to place a recommendation for regular eye examination somewhere near the product.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Some extra activities that we are capable of doing to help out with eg hospital assessments can vary across the uk depending what has been arranged. If these activities are covered by the hospital for responsibility then goc has no need to take responsibility with accreditation or approval. However if it becomes a defined extra qualification then the goc should probably have a method for listing without causing complication or duplication.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

I think all businesses should be registered in some way.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

I had huge issues trying to register the business when I made it a limited company rather than sole trader and now have to pay twice to carry out the same job. It should be easier to add the limited company if run by someone already registered. If someone is running a business that is not qualified then all should be registered in some way even if have a different category for that.

Lots of places sell ready readers - should they have to have some sort of registration? or at least the producer so can say they are sold under direction? Registered businesses have more regulation for the same product - should be evened out.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

Should be able to inspect if there is investigation of complaint and it would be helpful to the case. However, I already have regular practice inspection to make sure have all the required equipment and there is also some checking of records to make sure examinations and dispensing are up to standard. GOC should not need to duplicate.

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

I

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

If dispensing opticians are going to undertake refraction they should do the conversion course and become an optometrist. The refraction and eye examination should remain as a whole entity so get full picture. If there are too many people doing parts of the examination patient becomes uncomfortable with being passed from pillar-to-post and it's amazing how much information comes out while have patient in room for a while - this would be missed if only short time with each person.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Optometrist would lose information added by using retinoscope. History and symptoms is a huge part of the eye examination - the DO and OO would both end up having to ask a lot of questions so not saving any time. Refraction sometimes needs amended to help any pathology found. DO could do unaided vision and visual acuity with current specs as part of pre-screen but vision while refracting can give pointers to pathology. If you train the DO to pick up on these then they may as well do conversion to OO.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Optometrist should be free to separate refraction if dealing with eye health issue and it is not appropriate to do at the time. I have worked in England and had to do a refraction to be able to claim for a sight test when it was a waste of time that could have been spent on other tests. I currently work in Scotland where refraction can be left out and done with a supplementary examination at a later date (this has to include an eye health check) So can eye health check and refraction be separated - yes but only when eye health check is revealing issue not for refraction to be done on it's own to sell spectacles.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As previous question there is an advantage to separate refraction if it is not suitable to do it at the time of eye health issue. The biggest disadvantage of separating refraction would be the potential to miss pathology with the eye health check. It already happens with patients who use ready readers and don't bother to have an eye examination for a long time - sometimes they come in as they have noticed an issue, if it's visual loss due to glaucoma then it's too late. For the patient there is the option for a qualified person to use a prescription over 2 years if eg specs are broken and the person cannot manage without immediately replacing but at least there is a degree of assessment. Some of the relaxations made for during covid such as extending prescription, telephone contact lens checks for short temporary extension of supply, remote assessment of problems eg picture sent of sub conjunctival haemorrhage could all be considered for permanent use.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

Most Scottish eye examinations are processed electronically and have a box saying if referred or not- psd would have figures. Only a percentage of English examinations are done on nhs so would not give the full figures - you would need to know the percentage nhs to private for a practice too.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

Only my own experience

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

eg downs syndrome patient - should remote such as online buying be restricted as fit much more difficult even if DO is watching order. However a well trained optical assistant could do a good job under direction so perhaps not in practice restriction. That's ok so long as registered person and staff know their limitations

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

I'm not sure you can change it much as those that sell online ignore the current ones as it is. Don't want to increase legislation for those in practice but need to tighten up on those that are managing to supply without adhering to the rules we have. I have numerous patients who have changed a number (fit or power) or ordered a completely different lens (even spherical and not got the toric part)

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Just need each seller to adhere to it

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If someone has uploaded or handed in a written specification which is on letterhead etc then shouldn't need to verify but when patient just filling in online or handing you the packets of current then best idea to verify as often not correct. Also don't know when last check up was in those situations. Risk to patient eye health if aftercare not followed up.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

As a minimum should include a check of eye health ie cornea. Check patient is using and caring for lenses properly, wearing time, new lens frequency, assess fit and power.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Zero powered lenses should be treated the same way as powered. The potential for patient harm comes when buying themselves without any advice/ care.

Patients have bought them and just had to work out how to insert and remove.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

as above

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Can get away with most things for low powers but anything over 4DS there is a lot of things to know. Allowing patients to sort for themselves can cause all sorts of problems

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Things can change a lot in 2 years.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There is always the option of a registrant being able to provide over 2 years but this would be a considered opinion so safer.

Ages 20-40 are fairly stable so could consider going to 5 years but then gets messy if lots of different times for categories as some of those eg diabetics you wouldn't want to go to 5years. For a lot of categories 2 is quite reasonable.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If it is plano powered then would be ok. Anything powered should come under same rules as specs.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not Answered

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Being able to do phone consultations and use photos was a definite advantage during covid lockdown as patients didn't have to make unnecessary visits at times. It's not always clear enough so sometimes a face-to-face appointment is better and don't always see what you expected so needs to be done with caution. However, if someone is poorly or has huge difficulty attending it can be helpful to know if safe to delay appointment or decide if not necessary.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Eye exams, contact lens fitting, dispensing to vulnerable groups

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sale of optical appliances, eye exam, contact lenses, dispensing to vulnerable groups

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

no

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Unregulated supply of contact lenses is already an issue and could be exacerbated

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

They are not regularly verified now so they need to be tightened

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There are no advantages that i can see and only disadvantages and potential risks to the contact lens patient

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Student dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

ALL dispensing needs to be REGULATED

More and robust action needs to be sought for online sellers including those registered abroad that sells into the UK

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

ALL DISPENSING

ALL SALE AND SUPPLY OF OPTICAL APPLIANCES

ALL SALE AND SUPPLY OF CONTACT LENSES

ALL SALE AND SUPPLY OF LOW VISION AIDS INCLUDING OFF THE SHELF MAGNIFIERS

ALL SALE AND SUPPLY OF READY READERS

7 What activities do you think must be restricted to our registrants?

Please provide details.:

ALL DISPENSING

ALL SALE AND SUPPLY OF OPTICAL APPLIANCES

ALL SALE AND SUPPLY OF CONTACT LENSES

ALL SALE AND SUPPLY OF LOW VISION AIDS INCLUDING OFF THE SHELF MAGNIFIERS

ALL SALE AND SUPPLY OF READY READERS

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

FITTING OF ANY SPECTACLES

DISPENSE TRIAGING OF ANY SPECTACLES

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Refraction for DOs - as a DO can complete a Contact lens course, if refraction is going to be enabled for a DO to perform, then there should be a certificate for refraction as there is for the fitting of contact lenses

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

The GOC fail to regulate businesses based over seas that sell to the U.K.

Any product sold into the U.K. to consumers are subject so U.K. legislation and regulations.

However, the GOC sooner investigate their own registrants rather than actually taking the time and effort to investigate actual illegal sellers / illegal traders etc.

This is evident from my own complaint and the GOC responses.

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

They should be able to refract if the following apply

1. They complete a certificate for refraction, much like a contact lens certification
2. They're allowed to cyclo / dilate patients
3. They're allowed as a minimum to provide an anterior examination
4. Protection put in place for the DO for pathology related issues that would not normally be detected in a basic refraction

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The only benefit would be as part of dispensing triage when a patient is having issues with spectacles.

This would be the only logical reason for a DO to be able to refract.

However, for routine eye tests, this still needs to be completed by an optometrist only.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients eye health is paramount and as it is, the optometrists have the relevant knowledge and skill to carry out Examinations.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Any patient that is registered as disabled

Any patient that could be considered vulnerable such as those with dementia as an example

Personally, ALL SALE AND SUPPLY OF OPTICAL APPLIANCES SHOULD BE RESTRICTED TO DISPENSING OPTICIANS

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

General direction would need to be removed.

The issue is general direction allows various practices to get away with supplying powered lenses, even to restricted groups without any knowledge of any registrant as it's just done without consultation.

By having a blanket legislation to stop this would mean ALL practices would have to follow the same rules without their own guidances added for general direction

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

The legislation needs to be tougher with all contact lenses verified by a registrant, including dispensing opticians only and not by general direction.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Improves safety to the patient

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Restrictions need to be increased.

No other retailer should be able to sell zero powered lenses such as for Halloween etc.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

The risk will decrease if also zero powered contact lenses sale and supply was restricted!

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Risk to young people vision and eye infections particularly around holiday seasons

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

MORE RESTRICTION FOR SALE AND SUPPLY OF OPTICAL APPLIANCES IS REQUIRED

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Risk to vision which in turn risk to general public such as driving with poor vision, or in occupations such as pilot

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Risk to anatomy structure of young persons
Risk to poorly fitted and poorly prescribed optical appliances
Risk to wrong sport appliance selected

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

ALL SALE AND SUPPLY OF ALL OPTICAL APPLIANCES SHOULD BE RESTRICTED TO DISPENSING OPTICIANS

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safer for patient
Knowledge on dispensing would be superior to non-registrants

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Remote consultations should not be carried out

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

ONLINE SELLING OF SPECTACLES SHOULD BE BANNED AS THEY DO NOT TAKEN INTO ACCOUNT PDS, BVD, PANTO TILT, HIGH RX ETX

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

RESTRICT ONLINE SELLING AND DO A BETTER A JOB OF INVESTIGATING

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Refraction should remain with optometrists.

If DO's are allowed to refract it would reduce care and allow large companies particularly to reduce test time and costs just to make more money. It will reduce patient care.

This from a DO

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Answered below

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Answered below

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Answered above

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

CET/CPD should be voluntary not compulsory.
Or at least an easier system than now. It's overly complicated

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It should be left with optometrist to give the best possible patient care. Pathology can affect refraction it should all be checked by one qualified practitioner.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A minimum time recommendation would be good. Large multiple companies trying cram as many tests into a day isn't in patients best interests.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It works fine but could do with clearer guidelines for the general public

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There is an increased risk of complications as patients can merely have the cheapest lenses and no aftercare leading to potential sight altering or sight loss complications.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As previous section

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The main issue isn't spectacles made from an old prescription, it's someone not having a regular eye examination.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Lowering quality

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No evidence but 35 years of experience tells me it will just be another cost cutting thing to make more money at the expense of patient care.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these.:

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these.:

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sale and supply of all contact lenses

Testing of Sight

Eye Health checking

Sale and Supply of Optical Appliances (with specific Exemptions as current legislation dictates)

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sale and supply of all contact lenses

Testing of Sight

Eye Health checking (including dilation/cyclo/local anaesthetic)

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

no

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

EYE HEALTH CHECKS AND REFRACTION ARE VERY MUCH LINKED, WITH THE RESULT OF ONE PART HAVING IMPLICATIONS ON THE OTHER PART. INTERACTIONS AND CONVERSATIONS THAT HAPPEN DURING A REFRACTION MAY BE VERY RELEVANT TO THE OPTOMETRIST IN INVESTIGATING A PROBLEM.

IF SEPARATED, THERE IS A STRONG RISK TO PUBLIC SAFETY, WHERE A MEDICAL CONDITION COULD EASILY BE MISSED.

IF ANOTHER PRACTITIONER or LESS QUALIFIED PROFESSIONAL, IS INVOLVED, THERE IS SIMILAR RISK THAT ISSUES COULD BE MISSED.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

WE DO NOT HAVE ANY ISSUES WITH THE CURRENT LEGISLATION IN OUR BUSINESS AND FEEL THAT IT DOES NOT CAUSE ANY BARRIERS FOR OUR PATIENTS AND THE CARE THAT THEY RECEIVE.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

1. BETTER CARE AS ONE PERSON IS RESPONSIBLE FOR ALL SECTIONS OF THE EYE EXAMINATION, MEANING THAT THE RISK OF AN EYE HEALTH CONDITION BEING MISSED IS SIGNIFICANTLY REDUCED.
2. QUICKER AND MORE ACCURATE REFERRALS INTO HES.
3. IF REFRACTION AND EYE HEALTH CHECK ARE SEPARATED, THERE IS A RISK THAT SPECTACLES ARE PRESCRIBED AND MADE UP WITHOUT THE KNOWLEDGE OF PATHOLOGY. THEY MAY NEED A REFERRAL TO HES BEFORE SPECTACLES ARE MADE UP. THIS COULD BE COSTLY FOR THE PATIENT.
4. CURRENT SYSTEM ENTITLES THE PATIENT TO RECEIVE AN EYE HEALTH CHECK AS WELL AS REFRACTION. IF THEY BECOME SEPARATED, THERE IS A RISK THAT THE EYE HEALTH CHECKS BECOME UNAFFORDABLE FOR MANY. OR THAT THE PUBLIC DO NOT UNDERSTAND THE IMPORTANCE OF HAVING REGULAR EYE HEALTH CHECKS. THERE IS A STRONG RISK THAT IT MIGHT BECOME A

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

AN ADVANTAGE OF THE CURRENT REGULATION IS THAT IT ENSURES CORRECT FITTING AND SUPPLY OF CONTACT LENSES. WE HAVE HAD TIMES WHERE PATIENTS HAVE OBTAINED CONTACT LENSES ILLEGALLY FROM AN ONLINE RETAILER, ONLY TO FIND THAT THEY HAVE NOT MET DRIVING STANDARDS BECAUSE THEY HAD ORDERED THE INCORRECT CONTACT LENS TYPE OR POWER. KEEPING AND ADHERING TO CURRENT LEGISLATION WOULD STOP THIS OCCURRING.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

BY CONTINUING WITH HIGH STANDARDS OF CARE, DICTATED BY THE CURRENT LEGISLATION, THERE WOULD BE LESS RISK OF CONTACT LENS COMPLICATIONS.

THERE ARE CURRENTLY MANY MODALITIES OF CONTACT LENSES AT DIFFERENT PRICES, AVAILABLE FOR PATIENTS, ENSURING THAT AFFORDABLE OPTIONS FOR ALL.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

PEOPLE WITH SIGNIFIANT LEARNING DISABILITIES
ANY PERSON DEFINED AS "VULNERABLE"
COMPLEX PRESCRIPTIONS

THE ABOVE CATEGORIES ARE SEEN AS EQUALLY VULNERABLE AS CHILDREN U16, SO THERE IS NO REASON WHY THEY SHOULD BE EXCLUDED FROM THE ACT.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

ENSURED ANYONE WHO IS VULNERABLE OR HAS LESS UNDERSTANDING, RECEIVES THE HIGHEST LEVEL OF CARE AND ATTENTION NEEDED. QUALIFIED PRACTITIONERS HAVE A GREATER UNDERSTANDING OF THEIR NEEDS, WHICH IS REGULARLY UPDATED THROUGH CPD. NON-QUALIFIED STAFF HAVE NO REQUIREMENTS TO UNDERSTAKE SIMILAR TRAINING AND MAY THEREFORE NOT BE EMPOWERED TO OFFER THE SAME LEVEL OF UNDERSTANDING.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No - the legislation seems sensibly and necessary for the safe supply of contact lenses and reducing the legislation would pose potential safety risks to the general public. We would actually back making the legislation more stringent and/or certainly policing the legislation better as there are lots of incidences where the legislation is ignored.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Yes - most members of the general public do not understand the measurements on a contact lens when ordering it. The current legislation means that we can ensure that the lenses a member of the general public is using is safe for them. We are seeing more and more that members of the general public are managing to get hold of contact lenses without the appropriate checks been carried out and this is leading to issues with poor vision and or inappropriate wear. Luckily due to the legislation these incidences are few and far between but changing the regulation would undoubtedly lead to an increase in them.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Unfortunately, it seems as though these legislation requirements are seldom conformed to. We have experienced incidences where incorrect lenses have been supplied and clients have not been able to reach driving standards in supplied lenses without follow up. These requirements not only need to be upheld but need to be enforced better

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages - faster for patients to get supply

Disadvantage - Increased risk to incorrect supply. Increased risk of contact lens related complications. Increased burden on HES. Increased risk that the general public will see contact lenses as an unsafe option and not the lifechanging product they can be for clients when used and dispensed correctly.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Yes - Not providing a definition can and does lead to lose interpretations of the need for continuing care. This can and does lead to inconsistency with "after care" and issues with safety to the general public.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Zero powered contact lenses still have all the same risks to the general public, other than issues arising from Poor/unaided vision. The risks of health problems are probably higher than with prescription contact lenses, as generally the quality of the lenses are lower. Understanding of how to care for the lenses safely is lower as patients are generally less well informed, as they are less likely to have had any significant contact lens fitting/introduction.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

lack of educating the general public on how to safely look after contact lenses will inevitably lead to an increase in contact lens related problems and an increased burden on the HES which could and should be preventable by appropriate legislation and policing of this legislation.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Legislation on its own will not and has not solved the issue. It also needs effective policing of the legislation.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages – Keeps the general public safe – (as long as the legislation is policed)
Disadvantages – Will increased the cost to the general public.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Although it may be difficult to enforce legislation. We should not put the safety of the public at risk and compromise or dilute our legislation in order to "level-up the playing field". We should hold ourselves to the highest standards of care and educate the public on why we have these standards and how the public can differentiate between suppliers who hold themselves to these standards and supplies who don't. If it is not practical for the GOC to bring about private prosecutions could/should they at least provide legal support for those who have been wronged by a supplier flaunting the law and would like to ensure legal action?

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Yes, the general Public cannot be expected to fully understand the ramifications of purchasing optical appliances. Professionals selling such devices should be held responsible and given guidance on what responsibility they hold

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Although it may seem like an unnecessary barrier to the general public they are not experts in the field. The two year prescription restriction is in place with the best interests of the general public in mind. The GOC should be making regulations with the public safety in mind and not dictated to by a small minority of "unhappy patients".

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage – Patients might save themselves a small amount of money and time (unless the prescription has changed in which case there will be a significant increased in cost and time)

Disadvantages – They are more likely to be walking around or driving with less than optimal vision. This could lead to them not only been a danger to themselves but also the other members of the public who they share the street/roads with

Reduced frequency of eye exams which will lead to an increased quantity of eye conditions like Glaucoma which are manageable if detected early enough but a cause of sight loss if not detected soon enough.

More clients will experience poor service levels as they will need to return for rechecks or further appointments more frequently.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage – Better Screening for eye disease, better quality of care for the public. Better levels of vision for clients meaning general public safer on the roads/streets.

Disadvantage - none noted

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Children are potentially vulnerable and should be protected by legislation... The needs for sportswear optical appliances can be complex and should be assessed and fitted by an appropriately trained individual.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages – more accessible

Disadvantages – higher risk of inappropriate or unsuitable appliance which could lead to injury or dropping out of sport due to inadequate vision/enjoyment.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages – Protects Children and ensure the best possible advice and products supplied by a group of fully trained and qualified people.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages – On the whole it works and keep the public safe, it ensures that the appropriately trained people are giving the best advice. All these people have signed a code of conduct to ensure they are acting in the best interests of the general public and can be held responsible if they act inappropriately. It makes it more difficult for unscrupulous individuals to take advantage of the system and knowingly or unknowingly putting the general public at risk by prioritizing revenue over acting in the best interest of the general public.

Disadvantages - none of note

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Technology should be embraced but needs to come with the required upskilling and training.

As technology moves so quickly this may mean additional qualifications outside of the typical University/Pre-reg training.

The technology should only enhance the ability of the practitioner to perform their role and it should not replace it. Autorefractors are notoriously unreliable and only work as well as the technician using them.

They should always be used in conjunction with other findings... OCT technology involves a learning curve and usually leads to an increase in referrals initially while a practitioner gets experienced and recalibrates their knowledge to a new normal. In our experience these things always work best when also using tried and tested methods to back up results... this is where the experience of the performer and the skill comes in to play.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The policy is correct but the policing and awareness for the general public needs to be improved.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Awareness to the public about who does and doesn't confirm to GOC standards. A bit like ATOL protection for holidays where holiday goes can be reassured. A GOC stamp of approval for optical sales where patients know they have some protection in terms of the supplier can be held to account.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Think its all best left alone for a few years weve jusy come out of covid

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Non registrants should not be allowed to work in optical practices. It puts the public at risk. Period.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Any advice on the sale and supply of spectacles shpuld be restricted.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Yes working in an optical practice.

Can i go and start pretending to be a gp or nurse- answer no.. its ridiculous that the body thats supposed to be supporting the public is even asking these questions. Mind boggling.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Optometry should be 5 years with a full prescribing qualification. Those who only want to refract and dispense can just do the current optometry degree

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

All opticians should be heavily regulated with severe penalties for those that dont

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

Optometry 5 year degree with doctorate qual and full power of medical treatment and diagnosis..

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

What a ridiculous statement. A dispensing optician by trade does dispensing. What if the gmc suddenly allowed optometrists to diagnose and treat chest infections.

Quite easy to do but someone will mess it up and make a misdiagnosis.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Zero advantages

Disadvantages- people prescribed the wrong glasses. Public will lose confidence in refraction. Someone will go blind or have a car crash and goc will have blood on its hands

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The people doing it have knowledge of pathology that is directly linked to sight testing. Most people could work as pharmacists- you just pick the meds of the shelf and give to px. Why go to uni for 4 years.. so you dont make a mistake
Dont undermine the process

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Quite a few but mainly because the government pays pennies for a sight test. So the public suffers as a consequence. What has the government done about that..

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

This is a no brainer. How can you even ask this question. What if patient in question has a cataract.. hemianopia, ptosis, corneal guttata..
Are you kidding!! Why not just deregulate the whole medical profession so people can order any meds they want

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Its already deregulated. Government does not very much to stop this.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes - please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Everyone. We are all equal

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Further safety to the public which is the aim of the government

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Stop allowing sale on the internet if you cant regulate it

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Yes contact lenses

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

testing sight

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear

selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

In addition, the GOC should take account of developments in practice that have occurred since the legislation was last reviewed and prevent non-registrants from carrying out the following activities either directly or under supervision:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:

highly-developed communication skills,

expert dispensing skills, taking into account factors such as facial characteristics and posture

an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour

an ability to judge the decision-making capacity of a patient

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

is long-term and potentially expensive

has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia

may be of value to patients who are over 16, as well as to children.

Recognising that legislative change could take some time, the GOC should review its standards of practice and standards for registered businesses to make clear what constitutes good practice for the benefit of patients.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

testing sight
fitting contact lenses
selling optical appliances to children under 16, including sports eyewear
selling optical appliances to people registered as visually impaired
selling zero-powered contact lenses
dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia
giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The GOC should take account of developments in practice that have occurred since the legislation was last reviewed and restrict the following activities to GOC registrants only:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:
highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:
is long-term and potentially expensive
has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia
may be of value to patients who are over 16, as well as to children.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

Yes, there should be a consistent approach to business regulation, recognising that some activities are within the control of businesses as opposed to individual registrants, such as ensuring that:

there is the right balance between clinical and commercial incentives
there are appropriate standard operating procedures
equipment is maintained correctly and staff are properly trained to use it
All businesses carrying out restricted activities should be required to register with the GOC and comply with its business standards.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

there is the right balance between clinical and commercial incentives
there are appropriate standard operating procedures
equipment is maintained correctly and staff are properly trained to use it

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

No, when the GOC considered this question in 2013 it concluded that the risks associated with business practices did not warrant an inspection regime. Since then, the GOC has strengthened the system of business regulation by introducing more comprehensive business standards that make clearer its expectations.

In the absence of evidence that the risks associated with business practices have increased and analysis showing that it is necessary and proportionate to introduce an inspection regime, the case for doing so has not been made.

As a general rule, the GOC should think very carefully before increasing the costs of regulation and these will ultimately be passed on to patients.

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

american + european

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

The GOC states in the call for evidence that, “dispensing opticians could undertake refraction for the purposes of the sight test if they are appropriately trained, competent, overseen and indemnified.” They go on to say that this would be possible only if they were to amend or remove its 2013 policy statement on refraction.

[redacted] supports the GOC’s view that dispensing opticians should be able to undertake refraction for the purposes of the sight test, subject to the stated conditions. Therefore, the GOC should amend its 2013 statement on sight-testing to enable this to happen.

We also recognise that refraction by dispensing opticians for the purposes of the sight test should be under the oversight of an optometrist or medical practitioner so that patients will continue to benefit from an eye health examination in conjunction with a refraction. This is a major strength of the UK’s system of eye care and enables eye and wider health issues to be identified and addressed at an early stage in line with the wider health policy focus on prevention.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Enabling dispensing opticians to refract as part of the sight test under the oversight of an optometrist or medical practitioner would be a limited change to the GOC’s 2013 statement on sight-testing. What is often overlooked is that this statement already allows dispensing opticians to refract outside of the sight test, e.g. to check a prescription.

The training needed to enable dispensing opticians to carry out refraction as part of the sight test would also be limited. They already learn about refraction as part of their initial education and [redacted] would provide additional training so members’ skills and knowledge are up-to-date. The GOC’s new outcomes for registration will ensure that future DOs are fully versed in refraction from the outset.

Enabling dispensing opticians to support optometrists and medical practitioners in carrying out sight tests would enable patient care to be provided in a more flexible way while upholding the principle that a sight test should involve both a refraction and an eye health examination.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

financially bad
equality bad

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

advantages - atleast fitting done by registrants as opposed to online companies swapping lenses to fit their agenda

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Yes, the sale and supply of optical appliances to certain groups of vulnerable patients should be further restricted so that it must be carried out by a registrant. Such patient groups should include people with learning disabilities or dementia because dispensing optical appliances to such patients requires enhanced skills and knowledge.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing optical appliances to people with learning disabilities or dementia requires enhanced skills and knowledge, including:

highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
understanding of medical conditions

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

online sale of contact lenses

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

disadvantage - sale of lenses on expired prescriptions

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

GOC doesn't monitor all sales due to seller not being registered

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No, the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 does not create any unnecessary regulatory barriers.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These restrictions are necessary to protect the public and should be maintained. We do not agree that the fitting process for such sportswear is 'not as complex' as for spectacles or contact lenses. Sports eyewear is fitted not only to ensure optimum vision but to afford protection to the wearer. Therefore, it is more rather than less complex to fit, requiring detailed questioning about usage and enhanced dispensing skills to ensure a safe, optimum fit.

The call for evidence also suggests that the restrictions might be unnecessary because sportswear is 'usually only worn for short periods'. While diving masks, swimming goggles or sport goggles can be worn for short periods, they can also be worn over an extended length of time. In any case, if such optical appliances have not been fitted correctly and/or appropriate advice has not been given, there is clearly an increased risk of harm if a child is unable to see clearly under water or is wearing a poorly fitting pair of rugby goggles. This could also result in harm to team members or competitors.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Eye health screening and diagnosis

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction and interpretation

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Delegated function refraction by dispensing opticians

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Continuity with most of world with responsibility collaborating between dispensing and optometry

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unnecessary restrictive protectionism

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Only empirical evidence after co managing delegated function course for DOs

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Protection to public essential

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No advantage. Danger of sight threatening pathology if unregulated

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

No

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Needed

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Unacceptable risk of corneal pathology

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Np disadvantage

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As above

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

No

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Np opinion

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

No

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

No

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

OCT images exchanged with consultant

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

As above

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Mo

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Mo

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

No

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

No

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

No

Further information

56 Can we publish your response?

Yes

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Measuring PD NO
Dispensing varis NO

7 What activities do you think must be restricted to our registrants?

Please provide details.:

NONE

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The full core of eyecare plan

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

A complete sight test is not just refraction, which I can teach my wife, who is non optical in 6 weeks. But of her lack of knowledge of applying this prescription to the concerned individual could result in disastrous results.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no comment

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

none

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

over 60's and under 16

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These most vulnerable individuals would accept things as norm despite not being correct

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

I had a child who wore his sisters c lenses coloured bought online and ended up at western eye hospital via me due to severe Keratitis

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

PUBLIC SAFETY

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

A PATIENT IN THIS TIME PERIOD COULD BE LOOSING SIGHT.

Th prognosis of any disease is much better earlier it picked up and diagnosed

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

none

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

FITTING COMFORT, CORRECT TYPE OF LENS MOST SUITED TO THAT PRESCRIPTION AND THE KNOWLEDGE OF THE LENS TYPES

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NOT SURE

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Testing eyes

Fitting contact lenses including Plano contact lenses

Dispensing to u16 and vulnerable people

Fitting prescription sports appliances

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction

Eye health check

Supplying optical appliances

Supplying optical sports appliances

Fitting of all contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Frees up the optometrist to carry out more eye health checks

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Vulnerable groups including those with dementia. Higher proportion in an ageing population

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

That contact lenses can only be supplied if a patient's eye test and contact lens checkups are in date

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient would not have had an eye health check.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Reducing increased eye problems and other health issues that could have been dealt with at early stage of diagnosis.
Maintaining business income

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Children must have the correct prescription and often unable to explain errors.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Testing of sight, eye examination, prescribing of therapeutic medications, prescription of spectacles, correction of sight, sale and supply of spectacles to U16 or partially sighted individuals, multifocal spectacles and all forms of contact lenses.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

as 6

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Sale and supply of multifocal spectacles

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

CQC-type inspections are not required and provide no more value

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

There can be no reason apart from desire for restriction of trade, to support a 'no' answer given that the proposed amendment seeks only to enable delegated function of refraction by DOs continually under the supervision of optometrists. Many instances of co-management exist in the wider ophthalmology sector and optometrists benefit from these more than any other group.

There is no support from the literature for a view that delegation of the refraction function to DOs would lead the public into situations of potential harm. CLOs carry out most contact lens fits in the UK and join in MECS services without evidence of a threat to public safety. One multiple currently is carrying out a teleoptometry pilot scheme using DOs under optometric supervision.

Upskilling is the norm in the sector as a whole, as ophthalmology must respond to the changing population and the need to deliver care to a progressively ageing populace. As optometry extends into therapeutics and minor surgery, there will be a need to backfill refractionist workforce positions. One look at the Optician magazine job adverts section will show that there is no pressure on jobs for optometrists.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantages: will allow for teleoptometry schemes using technology to provide for remote eye examination by an optometrist, with the 'hands-on' elements carried out as delegated functions by DOs. The impact will be greater provision of eyecare services in areas where there are longer waiting lists for optometrist appointments.

Supply of suitable candidates into the workforce to prevent a dropout of numbers as optometrists seek to use new IP, MECS and minor surgery skills. It would seem unlikely that great numbers of DOs will seek positions involving delegated functions. Relatively few DOs have the FBDO R or CLO

qualification, and conversion courses at educational institutions will be unable to provide high numbers of 'R' qualified DOs because the educational pipeline is simply not wide enough to teach and examine large numbers of learners.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Barriers to the unqualified are robust and must be better enforced. They are not unnecessary, they are there to protect the public. Only the addition of suitably trained and experienced DO refractionists acting under the direct supervision of optometrists needs to be implemented.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There is a risk to adequate supply of sufficient numbers to the workforce if the legislation does not change to permit DO refractionists working under supervision.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Registrant bodies corporate will be able to furnish council with accurate breakdowns of referral percentages, their changes since the pandemic and currently.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

I was not aware of any support or ambition toward such a two-tier system.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Public safety

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

CL are not fashion items. Acanthamoeba and other infective agents are a risk to sight to the unwary

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

It ensures that eye examinations at regular, safe intervals are encouraged. Sight-threatening disease is frequently asymptomatic to the patient and many life-threatening conditions are diagnosed after detection at eye examination.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Telediagnosis protocol and remote supervision is successfully implemented by bodies corporate in the UK currently

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Better provision of eye care in areas under-served with optometry and where there are longer waiting times for eye examinations

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The 2013 GOC statement limiting delegated refraction by DOs.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Remove the 2013 statement on DO refraction

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

DO delegated function courses providing more DO refractionists operating solely under the continuous personal supervision of optometrists

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

3 Which category best describes you?

Business registrant/employer

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Eye examinations

Refraction

Contact lens fitting

Dispensing to vulnerable category patients

Troubleshooting

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye examination

Refraction

Contact lens fitting

Dispensing to vulnerable category patients

Troubleshooting

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

As above

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Undoubtedly there are a number of companies who simply tick the boxes without any intention of adhering to the guidelines, if they know they won't be inspected.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Clearly there would be a short term financial benefit for companies, as a DO costs less than an optom.

However from a patient care perspective, it would surely be an inferior experience. It would also mean a more fragmented experience for the PX, if the refraction is separated from the actual clinical examination side of things. I can't see how refraction can be treated in isolation, as the clinical side often impacts on the given result.

I cannot see how it would influence inclusion or diversity.

I believe it is being pushed by some companies for commercial reasons, to try and have only "money making" appointments, and shipping the clinical side, which is considered less financially rewarding elsewhere.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

In my mind it would only be positive as it helps safeguard patients, and maintains a minimum level of care.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

IMO this role is already fulfilled by contact lens fitters and there is no benefit in having unqualified staff doing it. It can surely only be detrimental to patient care.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

It is simply not regulated closely enough.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

It needs to be monitored much more closely.

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Any form of testing to give a prescribed outcome either by eye test or contact lens testing

7 What activities do you think must be restricted to our registrants?

Please provide details.:

See above

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Modifications to Prescriptions

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

It would give them autonomy to come in to practices to see if they are providing service to which they are supposed to

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

It would be in the benefit to the patients if a Dispensing optician can re-refract but under supervision to alleviate pressure on the opticians. ie if the px needed a modified reading add for circuit board work the DO could then give a refraction to give the px what they need

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantage would be taking pressure of the Optician and helping with load

Disadvantage would be not refracting for driving as I feel that should still be down to the optometrist

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage would be a more up to date legislation to meet the demands of the general public in a modern age.

Disadvantage would be it would be harder on smaller practices which do not have the support of other qualified staff

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I think it should stay the same as if left unchecked could lead to rise in OTC purchases of C/L without proper training and possible more issues with wear

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

High rx patients and low vision to not cause any further issues leading to rx issues

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage would be able to monitor the patients and provide the care they need

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Unregulated this could lead to a rise in eye infections due to no training on wear

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage would be under or over prescribed rx on C/L but the advantage would only be monetary as people would buy as when

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Again even if the C/L power is zero still could lead to a rise in eye infections

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage is if the patient is happy with their current prescription then they could continue with it.

Disadvantage would be eye health check would be unmonitored and if the rx was not correct before the problem would continue

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage would be incorrect fitting of specs

Advantage would be more accessible goggle purchase

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

ive tested pxs who have presented for a stest early feeling their vision has deteriorated and thinking they need new specs etc. on refraction va has been reduced from a couple of lines to several, and in some cases a lot more. in these cases as i have done the fundus check a the same time i have found pappiloedema, macula disease, retinal detachments etc.

now if a DO did the stest on a 70 yr old with va reduced a line or two only, they dont think anything of it and it turns out to be disc swelling, gca, wet armd, RD etc then that is not the best outcome for the px.

even if they did feel an optician should take a look, theres no guarantee that the px could be seen immediately etc putting them at risk of sight loss

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

all as is at present! it will be like cow boy builders

7 What activities do you think must be restricted to our registrants?

Please provide details.:

refraction, eye health check, contact lens sale and supply, we pick up all the problems of the pxs who buy online without any after care!!

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

sale and supply of rx contact lenses

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

ive tested pxs who have presented for a stest early feeling their vision has deteriorated and thinking they need new specs etc. on refraction va has been reduced from a couple of lines to several, and in some cases a lot more. in these cases as i have done the fundus check a the same time i have found pappiloedema, macula disease, retinal detachments etc.

now if a DO did the stest on a 70 yr old with va reduced a line or two only, they dont think anything of it and it turns out to be disc swelling, gca, wet armd, RD etc then that is not the best outcome for the px.

even if they did feel an optician should take a look, theres no guarantee that the px could be seen immediately etc putting them at risk of sight loss

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

it undermines the profession, puts px ocular health at risk for reasons below ive tested pxs who have presented for a stest early feeling their vision has deteriorated and thinking they need new specs etc. on refraction va has been reduced from a couple of lines to several, and in some cases a lot more. in these cases as i have done the fundus check a the same time i have found pappiloedema, macula disease, retinal detachments etc.

now if a DO did the stest on a 70 yr old with va reduced a line or two only, they dont think anything of it and it turns out to be disc swelling, gca, wet armd, RD etc then that is not the best outcome for the px.

even if they did feel an optician should take a look, theres no guarantee that the px could be seen immediately etc putting them at risk of sight loss

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

no advantage of DO's refracting as visual assessment prompts optoms to look for certain conditions in otherwise asymptomatic pxs, this is built from experience. DOs will be incentivised to become refraction machines and bonussed for this and would miss signs of pathology due to vision change etc

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no issues with it remaining as it is and pxs appreciate the professionalism of having stested by a professional qualified person

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

its about 3 or 4%

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

we should be proud of our px care towards px by offering initial trials and check on fits rather than supplying cls without req for upto date rx and checks etc

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no issues at all

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

as is at present

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and

equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

no ongoing advice or aftercare

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

it wont help the eye hospitals if they start seeing pxs at stages of advanced pathology missed due to seperation of refraction and eye health checks and or not having eystest with ocular check as they can continue to buy specs on out of date rxs!!

this very idea is flawed, more pxs having refractions only, being allowed to use rxs over 2 years old = pathology picked up later stages when symptomatic and progressed more work for HES not LESS!!

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

it wont help the eye hospitals if they start seeing pxs at stages of advanced pathology missed due to seperation of refraction and eye health checks and or not having eystest with ocular check as they can continue to buy specs on out of date rxs!!

this very idea is flawed, more pxs having refractions only, being allowed to use rxs over 2 years old = pathology picked up later stages when symptomatic and progressed more work for HES not LESS!!

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no issues at all where as other opytion is

it wont help the eye hospitals if they start seeing pxs at stages of advanced pathology missed due to seperation of refraction and eye health checks and or not having eystest with ocular check as they can continue to buy specs on out of date rxs!!

this very idea is flawed, more pxs having refractions only, being allowed to use rxs over 2 years old = pathology picked up later stages when symptomatic and progressed more work for HES not LESS!!

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

online sales should not be allowed as there are a lot of poor fitting specs- incorrect rx's, pd's, heights etc causing issues to p's and some aren't even aware and suppress monocular changes

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

selling contact lenses
refraction

7 What activities do you think must be restricted to our registrants?

Please provide details.:

none

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

none

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Train CLO S TO BE ON A LADDER SO EACH QUALIFICATION WILL LEAD TO BE A FULLY QUALIFIED OPTOM .
ALTERNATIVE QUALIFICATION AS AN OPTOM MAKES BETTER OPTOMS COMPARED TO FULL EDUCATION OPTOMS MANUFACTURED BY UNIVERSITY

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

I qualified as a refractionist accredited by college of optometry .It took 35 weeks one day per week at city and east college .lecturer [redacted] . I can show you my certificate .
I worked with optoms and proved to be very productive .Patients found it a very thorough eye test .Every patient was fully examined with a slit lamp for a full check of anterior eye .

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Progression . with such a shortage of optoms will reduce this .NHS req more optoms to progress to qualify so reduce Nhs delays for px . This will take less time of GP S. and ophthalmologist.
Optoms should be able to be able to train in various fields .

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NO Advantage .NHS cannot continue as it is.ST FEE in future will be taken out of NHS to reduce cost

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is working

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

under 16

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

safety

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

disadvantage cannot confirm specifications

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

safety

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

no safety for patient protection

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

safety

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no anser

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no answer

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

not sure

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

no answer

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

CLO has no protection ..PX may not give full info to continue wearing cls . AC will show problems

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

no answer

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

no answer

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

no answer

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

no answer

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

no answer

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

[redacted]

3 Which category best describes you?

Business registrant/employer

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Providing comprehensive eye tests, but not refractions

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Provision of the eye health aspects of an eye test, but not basic refractions

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should not be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

With the advent of tele-optometry, the question of off-shore acuity testing looms. It is already possible to obtain an acuity test and a signed Rx on-line, from off shore. Off-shore acuity testing should not be restricted as long as it only results in an Rx, not an eye health determination. The Rx should be deemed valid in the UK as long as it was issued in accordance with the rules in place where it was issued.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

Contact lenses are totally deregulated in most of the world, including almost all of Europe. Deregulation has resulted in FEWER eye health problems, apparently because compliance, especially with daily wear lenses, improves significantly. Increased ease of obtaining replacement lenses improves compliance. Unpublished contact lens industry research in Europe has shown this to be the case. This was also clearly the case in the USA where [redacted] research (where I served on the Board of Directors for eleven years) showed significantly improved compliance for wearers purchasing on line.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

There is no clinical evidence that extension of business regulation achieves anything. I do not believe there is a demonstrated benefit. A demonstrable and significant benefit would have to exist to justify extension of business regulation.

In the USA, [redacted] studies have shown that increased regulation "increases healthcare inequalities by making it unnecessarily harder for women and racial/ethnic/religious minorities to be involved in provision of essential care."

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Extension of business regulation increases healthcare inequalities by making it unnecessarily harder for women and racial/ethnic/religious minorities to be involved in provision of essential care. This has been shown consistently by [redacted]

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

I do not see a valid reason for inspection other than in the case of clear violation, which should be possible under the current system.

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

Only qualified practitioners should be regulated, not businesses. There would have to be clear and unequivocal evidence of need before businesses themselves should be burdened with regulation.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes - with no restrictions

Please give your reasons and provide any evidence to support these.:

Refraction has become so easy and foolproof that dispensing opticians should be permitted to refract AND issue an Rx.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Availability of Rx's, for acquisition of eyeglasses, would be significantly improved. Those of us who have been retailers of eyeglasses know from experience that having to obtain a comprehensive optometric eye exam, just to obtain new glasses, results in many people not seeing properly.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Those of us who have been optical retailers for many years know from experience that many people do not purchase new eyeglasses on a timely basis due to the fact that obtaining the currently required comprehensive eye test is a hassle.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Current sight test regulation is a disadvantage because it results in significant numbers of people not acquiring new eyeglasses when they should. This is a lot more serious than many realize.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

A comprehensive eye exam results in about 2% of patients being referred to a medical practitioner. This can be as high as 4% in areas of economic deprivation.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

There is no clinical evidence anywhere in the world that justifies an eye health check in association with someone only wanting a new pair of glasses. The official position of the [redacted] is that a comprehensive eye health check should be "relatively infrequent" until older. For older age groups, the [redacted] recommends 2-4 years for ages 40-54; 1-3 years for ages 55-65; 1-2 years 65+. Below 40 the recommendation is 5-10 years.

<https://www.aao.org/clinical-statement/frequency-of-ocular-examinations#:~:text=For%20individuals%20aged%2055%20to,in%20the%20absence%20of%20symptoms>

Net, net: In the absence of clear evidence to the contrary, a comprehensive eye exam should not be required to obtain a refraction.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

My response applies to first time wearers only. Experienced wearers rarely actually require a new fitting, despite what many contact lens fitters recommend (in their own self interest).

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I am happy for contact lens fitting regulations to remain as they are.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

There is ample reason to restrict supply of optical appliances to under 16s and to those registered visually impaired. But I do not recommend additional restrictions.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not applicable

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

There is no clinical evidence anywhere in the world to justify regulation of the sale of contact lenses provided as replacement lenses to experienced wearers. A [redacted] told me "I have never seen anything other than readily available anecdotal evidence supporting continued regulation of contact lenses. On the flip side, I have not seen anything from deregulated areas saying deregulation resulted in health problems."

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

It is clear that regulation of the sale of replacement lenses to experienced users results in increased eye problems due to non-compliance with wearing protocol -- such as the common problem of wearing daily lenses for several days. The regulation of the sale of contact lenses has the opposite effect many would believe. This has been proven in Europe and the USA. The European research was never published because the sponsor feared backlash from prescribers. The USA research was performed by [redacted]

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

See response to number 26 above.

I would point out that today's high water content daily wear lenses are far, far less problematic than the contact lenses of 29 years ago. Fitting parameters scarcely matter these days.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The impact of removing verification requirements would be an increase in eye health due (as noted in earlier responses) due to improved wearer compliance.

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The only zero power lenses sold with any frequency are disco and halloween sorts of lenses worn for only very short periods and infrequently at that. Beyond the always available anecdotal stories, the problems with these lenses is vanishingly small.

Net, net, who both to attempt to regulate these zero power lenses, especially given their readily available on-line cannot be policed.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

Not applicable

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The only impact is that buyers of these lenses will turn to the internet -- when it would be preferable to go to a proper optician or optometrist.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Requirement for an unnecessary eye health check requires engagement of expensive optometrists and thus hugely increases the cost of doing business. The availability and cost of eyeglasses will come down significantly if this unnecessary major expense is removed.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I see no risk to consumers. As per my response to earlier questions, there is no clinical evidence anywhere in the world to support tying a refraction to an eye health check. I have personally had optical businesses in 35 nations, with several thousands of locations, and am totally convinced there is no reason to require an eye health check in order to obtain eyeglasses. The [redacted] policy stated earlier supports my contention.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

See earlier responses. Any justification would have to be based on peer reviewed clinical evidence -- which I do not believe exists, and neither does the USA [redacted]

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

There is no clinical evidence to support a new Rx every two years -- nothing. People know if they see clearly -- another reason to be rid of the two year validity.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unnecessary expenditure -- a major reason for many people.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantage only -- waste of time and money.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Sportswear is probably not a problem, but i do not have in-depth experience in this area.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

For sports use only, there are probably no risks.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Personally, I believe it is a waste of time and effort to regulate in this area.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Prescription expiration should be removed -- no justification for keeping it.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages.

Advantage is enhanced ease and availability and lack of unnecessary hassle.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I sit on boards of directors of two companies developing advanced technology for the remote delivery of eye examinations and refractions

One is a smart phone app that provides an Rx in six seconds using only the smart phone camera. Accuracy is as good as the gold standard autorefractors. The test can be performed at home with no professional help. One of the many advantages is that the results can be accessible by your optometrist. This is especially handy for myopia management practitioners.

The second product is the first fully remotely operable slit lamp. This is UK developed technology, but the USA , Germany, Poland and Spain are the only seriously interested markets thus far, and where legislative restrictions will not exist. It would be a shame if this tech cannot be used in the UK.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Remote refraction capability "saved the day" for eyeglass wearers in Germany. One of my businesses used remote refraction tech in over 500 German locations, with great success.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The question is interpretation of the act, not the act itself.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The GOC has not been forward thinking with regard to adjustable lenses [redacted] . I have been associated with this UK-developed tech for many years. The GOC would not agree to sale of adjustable power lenses, even for diabetics and post operative people who have drifting vision. We have been selling this great product in 57 nations -- but not in the nation where the tech was developed.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

My response is to request that the GOC "lighten up" and not be so "letter of the law" oriented.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Not applicable

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Given the pervasiveness of the internet, regulation needs to consider the fact of Rx's being issued across international borders. This is already happening. Will this be challenged? Can it even be policed?

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

[redacted]

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Contact lenses (including cosmetic lenses & myopia control contact lenses)

Sight testing

Dispensing children & vulnerable or visually impaired adults

7 What activities do you think must be restricted to our registrants?

Please provide details.:

As question 6 above.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Would allow more effective use of professional time.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Dementia & learning disabilities.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Registrants would have greater understanding of the impact of such conditions & the necessary communication skills to ensure such patients are given the consideration they deserve.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The open supply of such lenses would encourage the swapping of, possibly used, contact lenses between people.

There would be no control over client suitability for such products & no physical instruction as to their insertion & removal or lens care regimes.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

See above answer.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantage of the health check element of the sight test might be lost.
The prescription might well have changed.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The quality & correct fitting of such appliances needs to be regulated if the correct protection is to be afforded to the child.
Indeed, a poorly fitting appliance could be of more harm than benefit.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dispensing of complex Rx's

Dispensing of any optical appliance outwith rx +6.00/-2.00

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

I feel this is part of the test and therefore should be done by the optometrist for continuity of care

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

An optometrist should refract their own patients for continuity of care. I disagree with dispensing opticians taking on that role. An optometrists role is undermined by allowing D/Os to do it

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

If the customer is happy with their vision and has no eye concerns, I don't see why an older rx could not not be used as long as the customer was aware of any risks.

It may cause less regular testing though therefore some hidden eye issues might be missed.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If the customer is happy with their vision and has no eye concerns, I don't see why an older rx could not not be used as long as the customer was aware of any risks.

It may cause less regular testing though therefore some hidden eye issues might be missed.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Testing eye sight
Supplying contact lenses

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Eye examinations
Contact lens activities

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Testing eyes

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

You cannot refract patients without being an optometrist as you need to be able to investigate pathology

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Optometrists need to retain refraction restricted to them as if a DO could do this unsupervised optometrists would not be able to gain employment. There is more to refraction than just holding up lenses and I don't think DOs should be able to do this. DOs are not optometrists and should not be trying to take over part of our job. This is totally devaluing our profession. You cannot refract without being able to identify and understand pathology. If they want to refract they should train as optometrists

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would allow optometrists to protect our profession

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It protects the public

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these.:

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

I do not agree with the new changes being discussed. Only an Optometrist should have the ability to carry out a complete eye examination. A Dispensing option or Optical assistant are not registered onto the GOC and should be kept this way. DO NOT DEGRADE OUR HARD WORK. OPTOMETRISTS DID NOT WORK HARD JUST FOR THIS TO HAPPEN.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Anything in regards to an Eye exam

Non-registrants NEED to be restricted from anything that only an optometrist can do at the moment.

DO NOT DEGRADE OUR HARD WORK. OPTOMETRISTS DID NOT WORK HARD FOR YEARS JUST FOR THIS TO HAPPEN.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

DO NOT DEGRADE OUR HARD WORK. OPTOMETRISTS DID NOT WORK HARD FOR YEARS FOR THIS.

THIS IS A HUGE MESS

THE TITLE OPTOMETRIST HAS BEEN SPAT ON MULTIPLE TIMES.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

This has got nothing to do with inclusion or equality - do not degrade the job of an optometrist.

An Optical assistant or Dispensing Optician did not go through 3 years of university and a year of pre-registration like we did.. where is the equality on our side????

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

The GOC keep on betraying our trust. The council we rely on the most cares more for money than the public health ..

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

DO NOT DEGRADE OUR HARD WORK. OPTOMETRISTS DID NOT WORK HARD FOR YEARS JUST FOR THIS TO HAPPEN.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

DO NOT INSULT MY DEGREE AND HARD WORK

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

There won't be any advantages, the dispensing opticians shouldn't be able to do what an optometrist have spent years to learn.

This is a huge disrespect to our degree.

With all due respect, dispensing opticians should stick to dispensing patient not refracting the patient.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No advantages.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

.
33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.
6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

.
6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

.
38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.
39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.
6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

.
41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

A patient needs the practitioner present in front of them - they rely on the practitioner to provide the best patient care. Doing this remote can and will lead to problems such as missing key ocular informations.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

.
51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

.
53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

.
54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

.
55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Health care is already flexible.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Restricted/prevented from testing of sight, fitting of contact lenses and the supply & sale of optical appliances and zero powered contact lenses

7 What activities do you think must be restricted to our registrants?

Please provide details.:

All of the activities I have outlined in question 6 in the current act.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Sale of optical appliances online including and not restricted to contact lenses and spectacles

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

As mentioned in point 28, I feel businesses are already regulated sufficiently/extensively

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

As mentioned previously I feel that businesses are regulated extensively/sufficiently

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

Unnecessary and unfair disruption to business which would impact them financially. Requirements to operate a business by the GOC are sufficient/extensive already

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Eye examination and refraction go hand in hand. There may be pathology present that could go amiss and which could affect the refraction without the dispensing optician having any knowledge of this. Also could result in unfair and unnecessary sale of spectacles and optical appliances to patients.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Also, a referral may be required for pathology (for example a cataract) which has caused a change in vision, how would a dispensing optician be able to determine this and make reliable decision? I do not feel the eye exam and refraction should be carried out separately or 2 different people, it should be carried out by an Optometrist or registered medical practitioner. See it from a patients point of view, the best decisions need to be made for the patient. I do not feel this can be done when a refraction has solely been done by a dispensing optician. An eye exam goes hand in hand with refraction.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

See answers to questions 15 and 16. Also I agree with the points made in note 36....Splitting the eye exam may also result in the ox not attending health checks resulting in potentially avoidable sight loss and increase in serious eye conditions. Financially getting both eye exam and refraction at the same would be better financially for the patient and also saves time for the patient.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

All round better for the patient. Both done at the same time. The correct decision/call on whether new spectacles prescribed based on outcome of eye exam.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I do not think there will be any disadvantage for the legislation staying as it is. Advantages of it staying as it is, patient care is not compromised, especially if a clinical complication/problem was to arise.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I agree that those that AREN'T REGISTERED dispensing optician, optometrists and registered medical practitioners do not have the necessary skills and knowledge to understand and address the specific needs of those types of patients.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

In date sight test are important. Both go hand in hand

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Verification is important

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No advantages

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Some direction would create consistency for patients and also avoid confusion to the patient with varying information/examinations given done to the patient. For example, procedures omitted by one practitioner as opposed to another practitioner reduces the importance to the patient.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Risk of missed pathology

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantage of the contact lenses legislation staying as it is

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

More should be done to restrict online sales of contact lenses to the patients based in the UK. The GOC should put stricter conditions in place regardless of time and cost.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

A free for all. Wrong info given with regards to patient care with contact lenses and the sale of other optical appliances i.e. advice and care of any pathological/physiological problems that may arise from wearing contact lenses and other optical appliances being non-existent/ poor/ inadequate.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Changes in prescription go undetected, pathology undetected by non-registrants

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages if it stays as it is. Main advantage is that pathology would be detected and dealt with properly, promptly and safely by registrants. Much safer for the patient.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Pathology being missed. No correlation between any eye or health conditions & fitting of these optical appliances.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantage if legislation stays as it is

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Supply of contact lenses to non-registered companies with the GOC.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unregulated supply of optical appliances online.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Missed pathology with remote care. Body language missed-can affect a px's response resulting in incorrect outcomes/results.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

I've heard that remote refractions are being conducted by a company in the UK by a company based outside of the UK. I feel this is dangerous for the patient and should not be allowed.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Stop refraction being conducted remotely. Refraction and eye exam should be done at the same time. I feel they go 'hand in hand'.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Online contact lenses sales and online spectacle sales where patients are 'trained without regulation to take their own pupillary distances.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Pupillary distances should be enforced to be taken by a registered dispensing optician, optometrist or registered medical practitioner. These individuals should be reimbursed financially and adequately to provide this. This should be stated in legislation.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above
and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Existing restrictions are sufficient:

e.g.

Use of protected titles

Testing of sight

Fitting of contact lenses

Supply of optical appliances to under 16 and those registered visually impaired

Selling plano contact lenses without a "prescription" from a registrant

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Existing restrictions are sufficient:

Use of titles

Testing of sight

Fitting of contact lenses

Supply of optical appliances to under 16 and those registered visually impaired

Prescribing medications (IP optometrists)

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should not be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

The DO is in an excellent position to accurately refract due to the nature of their training and expertise.

By creating this opportunity under the supervision of an Optometrist a two tier sight test would be avoided which would be in the patients best interest. We must avoid circumstances where patients forgot vital regular eye health checks.

This strategy would be more in line with other professions where certain functions can be safely delegated e.g. medicine, pharmacy, dentistry.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The pressures on the clinical workforce could be eased allowing optometrists to focus on healthcare and create efficiencies within practice.

An enhanced level of care could be delivered through these initiatives.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It is vital that we preserve the restrictions on making sight tests conditional on the purchases of eyewear and the requirement to have a prescription handed to the patient after the examination.

Patients have benefitted greatly from the increased choice of dispensing options available to them beyond the provider of their sight test e.g. increased choice of frames and lenses, convenience, payment options and value for money.

There is no evidence in our experience that patients are in any way disadvantaged by choosing to purchase spectacles from a different provider than their sight test.

The argument could be made that clinicians who test sight are better removed from the dispensing of spectacles to ensure no commercial pressures are felt to dispense spectacles.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantages are that patients are currently being cared for at a very high standard by their Optometrists and that they are very safe and healthy as a result. There does not seem to be evidence of the contrary.

The disadvantages of not considering enhanced delegated functions under supervision of Optometrists is that demand for clinical care outstrips capacity to deliver with an ageing population. More efficient, multidisciplinary models could help.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Very little evidence of a need for change. Where is the problem with the current restrictions on requiring a highly trained registrant to provide the prescription for contact lenses.

Innovation and change should tackle the wider problem of an ageing population and the associated healthcare needs.

If there is a shortage of registrants who fit lenses, perhaps another level of registrant could help (similar to the dental hygienist)- contact lens assistant who could work under the supervision of a registrant.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

The registrant fitting contact lenses should be obliged to hand over a copy of the contact lens specification after the consultation in exactly the same way for sight tests. This is equitable for patients who choose contact lenses and would like to pursue different options of purchase e.g online, subscriptions etc.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Verification creates confusion and inconvenience for patients who wish to purchase lenses from different suppliers, creating inefficiencies and increasing costs which are then passed onto the patient.

The registrant fitting contact lenses should be obliged to hand over a copy of the contact lens specification / prescription after the consultation in exactly the same way for sight tests. This would remove the need for verification.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Simply removing the need could create risks due to mistakes but the root cause is the lack of a regulation to hand over a complete specification at the time of fitting.

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

The public require protection from the potential risks of wearing contact lenses- opening up supply would increase sight threatening eye disease.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Requirement for a contact lens fitting and specification to be handed over at the time of fitting. These would be plano power / cosmetic lenses but the registrant has assessed suitability and eye health.

The patient could then choose to purchase freely if they have an in date specification.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

The Sale of Optical Appliances Order of Council 1984 is sensible legislation that strikes a good balance between removing unnecessary restrictions on supply and protecting patients from poor quality spectacles made by unscrupulous businesses.

Patients who choose to buy eyewear from non registrant providers are currently being served well and are very safe. There is a requirement to work to a prescription from a registrant, manufacture the spectacles to a high standard and encourage the regular testing of sight.

The removal of these standards could lead to spectacles being made outwit specifications causing poor vision, eyestrain and potentially accidents.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

There is a robust process in place by Optometrists to remind patients when they should return for a sight test. This period varies depending on the patient e.g. 3 months for a child, 3 years for someone who does not wear spectacles. 2 years is irrelevant.

Patients are restricted from choosing to purchase if out-with the two year period even if they are happy with their prescription. This is especially true if glasses are broken and sight tests are not immediately available.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantages are to remove the inconvenience experienced by patients who wish to purchase new spectacles and are happy with their prescription. Patients are capable to consent and often request this option.

The disadvantage is the potential delay in regular sight tests which can be mitigated by regular communication from their eye health provider.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages are that the public perceive this as unnecessary legislation that goes against their personal choice.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction
Dispensing children
High Rx

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Ophthalmoscope
Refraction

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Children and high Rx dispensing

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Myopia control

Dry eye

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction isn't just about giving Rx to make specs.

There is a lot of information optometrist will gather during the course of refraction which often leads to further investigation.

I can't possibly think how separating refraction from the rest of the examination can be beneficial to the px and the optometrist?

The only benefit is for the practice owner employing a refractionist on lower salary to get Rx for making specs.

How many px know the difference between full eye examinations and only refraction?

How many will go back to have the health of their eye checked only!!

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

As above

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It's not a barrier to DO it's to protect the public.
DO s can continue with their training to become optometrist if they want

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As above

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Fitting contact lens by a registered optician is very important for the protecting the public short and long term

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The non qualified person won't necessarily understand how the pathology is impacting the vision and needs of the px.
Non registered May have different level of understanding and knowledge as they have not passed any training to make sure they know all aspect of vision and px care

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

It doesn't stop in line supply

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Many times I have seen px bought CLs on line using CL Rx and specification I have given them which is fine. But increasingly they are shown an alternative cheaper lens (I ve never heard of) and has caused a lot of damage to the cornea after wearing them 6/12 till I see them for their next aftercare

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As above

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Unsupervised
No fitting
No check if the external eyes
No proper teach
Say no more

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Who will be responsible if px gets an infection ? Or loose sight as a result of poor hygiene

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It shouldn't remain because no one should just buy CLs and put a foreign body in their eyes without proper fitting and teaching

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

What is it the responsibility of the supplier to put non too to Rx right.

I think every party should take responsibility of their own action

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

See above

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If during covid it has not been possible to have an Eye exam then we should let px chose to have specs made up to old Rx if they don't feel a lot of change in their vision provided there has been no pre notes pathology

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If none qualified dispense an out of date Rx the. Some condition might be missed

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

They will buy the appliances on mine which might not be the right one for them

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As above

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

You need to see pxs to know what is wrong

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sale and fitting of contact lenses and glasses without a complete valid prescription.
Refracting or prescribing optical Appliances

The use of the title of optician

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Registrants should be able to provide the service that their qualifications allow them to.
The sale and fitting of contact lenses, the sale of glasses .
Refraction and eye health checks
Optical business

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The sale of special lenses that require fitting and facial measurements

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Paediatric specialist tend to get the most out of young kids and they should be recognised for it.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

Registered businesses or run by registered person can be held responsible and regulated easier.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

The impact is financial and may mean the product cost more to the clients however it will mean that the customer will get a better product and more centred health service

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

The compliance tends to improve if there is a chance of inspection

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

The pharmacy model been working well and proven to work.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

The industry is trying to cheapen the cost of the service and by getting dispensing opticians to refract I feel the deregulation of optics will follow. A separation between refraction and eye examination can lead to lots of patients not getting what can be life saving eye examination in some cases. Vision and eye health are interlinked.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Separation between refraction and eye examination will be devastating as lots of pathology will be missed and lots of people will think refraction was eye health check.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The only barrier I can think of is cheap labor.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

For the restriction to stay as is will be with patients best interest how ever the service cost more as corporations have to pay higher wage to staff.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

It is available through primary eye care company that runs extended services.
LOCSU have better idea of the numbers.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The contact lens has a direct interaction with the health of the eye.
Miss fitting or use can cause higher rate of eye infection creating a heavier load on eye hospitals.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Regulated service is more expensive as has to be done by someone qualified and competent.
Risk of eye damage and miss fitting is minimised giving the patient more protection

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

The current restrictions work well and that should continue as is.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The main protection needed to all the groups that they are seen by the right qualified and registered person

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

It will lead to deregulation and increase the risk to patient.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If the verification removed then the risk to patient is increased as the responsibility of the supplier diminished.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Contact lens in the eye has the same interaction regardless if it was Plano.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

The eye infections relating to the use of cosmetic lenses is higher than prescribed due to patients not having aftercare or even fitting of contact lenses.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No negatives

The protection to patient from harm.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Ocular muscle issues.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Ill fitting glasses or ophthalmic lenses can cause a prismatic affect that can lead to a muscle imbalance .

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Evidence showed patients are likely to have a change in vision in that time.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If patient not needing to have valid prescription to buy glasses then we will likely have a made up prescription by non registered people and lead to damage to eyes causing harm to patients

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

May be at cost to patient to have a valid up to date prescription but that's with the benefit of the right correction required with best visual outcomes and eye health being check at the same time.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Eye correction to under 16s regardless of if purpose should always regulate as the affect of any ill fitting or wrong prescription is devastating in many cases.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The affect on vision development and extra ocular is huge in the early years of life.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Better fitting glasses
Safe use of optical Appliances

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient protection from harm at heart.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Not

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The power and ability to hold the suppliers responsible.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Better online regulation

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Member of the public

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Please don't let DOs retract. In what is just devaluing the role of an optometrist for commercial gain, I think (as a member of the public) I feel much safer in the j oak edge that an optometric professional that has gone through at least 4 years of professional and academic training is much more suited to ophthalmic opticians than to DOs.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction of patients.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction of patients.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Refraction.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Devaluing the role and professional experience of an optometrist for commercial gain is a downward slope.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Absolutely no patient safety benefit to allowing DOs to refract, this is obviously a cash grab to try and rake in more money for the multiples and the public can see through it.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Absolutely no reason to devalue the role of optometrists, what are the legitimate public safety interests in allowing DOs to refract? There are none.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I'm sure a lot are, and a lot of important clinical issues will be missed by allowing someone with less training than an OO to carry out refraction.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Works fine as it is, why change it?

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Why devalue the roles of those that already carry this out?

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Why devalue the role of those already carrying out this assessment.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Of course it is.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantage, don't change it.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

NA

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Of course it is!!

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure what sense it makes to remove this regulation.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure what sense it makes to remove this regulation.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Not sure what sense it makes to remove this regulation.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure what sense it makes to remove this regulation.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure what sense it makes to remove this regulation.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

Not sure what sense it makes to remove this regulation.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Should stay as it currently is.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Negative if you allow people with little clinical knowledge or experience to replace the valued role of an OO

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

NA

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Surely online sales can cause significant harm to patient safety if they're are not seen by an OO?

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Disallow the sales of prescription lenses without having a clinical assessment by an OO

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Other - please specify

If 'other', please specify.:

Consultant Ophthalmologist

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

although most of the objectives seem reasonable, i would argue that a key point that is not coming across strongly enough although touched upon in objective 2 and 3. There is a real and pressing need to include optometry far more in the more medical aspects of eye healthcare for the sake of efficiency, quality and patient experience of care (not just patient safety) as demand shoots up and there are clear moves to wholesale integration of primary eye care into the wider medical ophthalmic pathway. I would like to see this come across far more strongly as recognised and regulation acting to recognise this, support and promote it, and regulate with this in mind. Rather than a more vague (try not to get in the way of it"

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

I think as optometrists move to be more involved as clinician decision makers and manage medical ophthalmic conditions , we need to be less restrictive of some of their traditional activities which might be delivered by technicians or optometrist-assistants as has happened in hospital for doctors and nurses with technicians and health care- or orthoptic-assistants. I think sight testing might be done by others.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

selling optical appliances to children and visually impaired also those with reduced mental capacity

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:

Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

there are many more medical qualifications now needed but think that needing GOC approval might reduce or slow uptake

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

I am concerned that the CQC does not cover optometry practices but now there will be an increasing "medical" aspect to care in practice as the transformation of services occurs. It seems illogical that an ophthalmic assessment for glaucoma in hospital requires/merits CQC regulation and regular inspection of site and service but the same care in an optometric practical does not. I would like the GOC to consider how they can fill that gap. If something like this was in place, this would also hugely reassure hospital colleagues when they consider transfer of care to primary eye care from the hospital service. It might be that there can be a tiered approach depending on the level of enhanced services provided.

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

yes see above regarding CQC type inspections and regulation for domains such as clinical effectiveness, quality, leadership etc for site and services.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

It is crucial that optometrists are freed up and empowered to deliver more of the medical ophthalmic care as part of the transformation of eye care services and the integration of primary eye care into the whole end to end eye care pathway . To do so they need to be able to devolve as many aspects of their lower risk activities or "non medical" activities to other colleagues. This is exactly what has happened in hospital as technicians, health care assistants, orthoptic assistants etc do more, to allow in-hospital nurses, orthoptists and optometrists deliver enhanced and extended roles which were traditionally only done by doctors. I would argue that you should consider whether there are activities which can also be done by other colleagues beyond dispensing opticians eg by other technicians..

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Disadvantage might be the actual or perception of a lower quality sight test, or a sight test not fully embedded within a proper understanding of the patients health, social and other factors.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I do not know enough to comment as an ophthalmologist but, as per my answer to Q15, it's crucial that all activities and tasks that can be safely devolved to other colleagues from optometrists are devolved, to allow optometrists to make full use of their considerable higher skills and contribute more fully to ophthalmic care pathways. All tasks should be undertaken by a hierarchy of professionals based on risk of the task and the patient, and the competency of the professional, moving away from tightly defined roles based on professional title alone.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Optometrists will not be able to utilise their full skills to benefit patients and eye care services, patients will continue to be delayed, harmed, with poor quality service and poor experience due to capacity delays in the NHS services. Optometrists will feel frustrated that they cannot use all their skills with consequent moral, retention and other issues.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I have been told by colleagues with NHSE and optometrist colleagues feeding back to NHS England transformation team on publications and planning documents that it is around 5%. I believe [redacted] in London has specifically collected local London data on this too.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I think not direct data, but the experience in hospital of using non-registered colleagues to obtain diagnostic and clinical data to inform the overall care is a good parallel and there is a wealth of experience there.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

unsure

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Adult patients with reduced mental capacity (eg dementia, learning disabilities) need the extra protection similar to the under 16s and those registered visually impaired due to their vulnerabilities and extra needs.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

making these things an offence is not sensible or proportionate.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

small risk of over sales of optical appliances. No serious patient safety impact.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

disproportionate and difficult to enforce. GOC needs to concentrate on other more important aspects of eye care.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

the key disadvantage is that it might reduce uptake of regular sight tests with reduction in early case finding and care of asymptomatic diseases eg glaucoma. Advantage however would be consumer choice and access to glasses. As a consumer, when I was a younger adult with a stable refraction and little likelihood of asymptomatic ocular disease I found the current arrangements highly irritating. You could consider an age cut off for ability to purchase, or a longer time scale to give flexibility.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

the risk is negligible and the restrictions are simply not warranted.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

advantages would be far greater access to the appliances and the regulator and others can concentrate their precious resources on aspects that will be beneficial to patients.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

poor access to appliances, and a feeling of over regulation, diminishing respect for the regulator. Diversion of effort away from key patient care and safety aspects of eye care.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think there is not only the aspect of AI as you mention, but also phone and video consultations, home visual acuity monitoring apps and there might be the possibility of home ocular imaging, IOP checks visual field testing now or in the near future. In addition, there is the aspect of sharing diagnostic information and virtual diagnostics. So the patient may undergo tests and the clinician (whether the primary care optometrist or the hospital clinician) later reviewing the assessments or images and making a decision on care without a consultation with the patient. There are services where the optometrist/practice might undertake diagnostic tests which are then used by the hospital for decisions on hospital patients. The assessments are then being done by people without the exact same training, governance and equipment that the hospital has which introduced complexities. Beyond that there is introduction (fragmented) of electronic connectivity systems for referral or sharing information with other optical providers or the hospital. There are a whole host of technology improvements and challenges which might create risks.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Looking at published papers and the eye care hub, and the general direction of NHS England and devolved nations, its clear that there is a strong believe and evidence base that digitally enabled care and remote technology has huge advantages in terms of access to care, care closer to home, and more efficient care making services sustainable in the face of increasing demand.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

this aspect I am not sure of but I think its hugely important to review this and update in light of the fairly seismic changes in tech and remote care.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

there may be but its important and needs review

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

There are a large number of changes as per my answer to Q45 e.g. AI, phone and video consultations, home visual acuity monitoring apps and there might be the possibility of home ocular imaging, IOP checks visual field testing now or in the near future. In addition, there is the aspect of sharing

diagnostic information and virtual diagnostics. So the patient may undergo tests and the clinician (whether the primary care optometrist or the hospital clinician) later reviewing the assessments or images and making a decision on care without a consultation with the patient. There are services where the optometrist/practice might undertake diagnostic tests which are then used by the hospital for decisions on hospital patients. The assessments are then being done by people without the exact same training, governance and equipment that the hospital has which introduced complexities. Beyond that there is introduction (fragmented) of electronic connectivity systems for referral or sharing information with other optical providers or the hospital. There are a whole host of technology improvements and challenges which might create risks. I think you need a comprehensive look at all these aspects, what are the key risks to patients and services, and then map whether these might benefit from regulatory change. Its too complex to answer in a consultation this needs serious work. The other aspect of all of this is the integration of primary eye care into the wider ophthalmic care pathway, which might also need a review of risks and how regulation should contribute.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think there are three issues I have seen which I would like more emphasis on ensuring avoidance of this practice - whether this can be regulatory I don't know:

1. The targeting of children above the sensitive age for sight -tests for "visual development" including optometrists going into schools to offer this. There needs to be more honesty that this is different from screening for amblyopia and not supported by national screening committee.
2. Younger children getting very very low prescriptions eg +0.25/-0.25D which as a paediatric ophthalmologist I have seen a lot of, in the context of really no significant refractive error or need. Patients at all ages need to be very clear about any risks and benefits of low refractive errors and be advised that with low refractive errors there may be little/no harm from not having glasses.
3. It might be useful to have something specific around behavioural optometry and vision therapy.

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think there are three issues I have seen which I would like more emphasis on ensuring avoidance of this practice - whether this can be regulatory I don't know:

1. The targeting of children above the sensitive age for sight -tests for "visual development" including optometrists going into schools to offer this. There needs to be more honesty that this is different from screening for amblyopia and not supported by national screening committee.
2. Younger children getting very very low prescriptions eg +0.25/-0.25D which as a paediatric ophthalmologist I have seen a lot of, in the context of really no significant refractive error or need. Patients at all ages need to be very clear about any risks and benefits of low refractive errors and be advised that with low refractive errors there may be little/no harm from not having glasses.
3. It might be useful to have something specific around behavioural optometry and vision therapy.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

see answer to Q52 and 53

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Non-registrants (i.e. not a Dispensing optician, Optometrist or other registered medical professional) should be prevented from:

- Testing Sight
- Conducting Eye health Examinations
- Fitting Contact lenses
- Fitting or supplying Zero powered Contact lenses
- Selling and Supplying optical appliances to persons under the age of 16
- Selling and Supplying optical appliances to persons who have are sight impaired
- Selling and supplying optical appliances to vulnerable adults

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Activities that must be restricted to GOC registrants:

- Testing Sight
- Conducting Eye health Examinations
- Fitting Contact lenses
- Fitting or supplying Zero powered Contact lenses
- Selling and Supplying optical appliances to persons under the age of 16
- Selling and Supplying optical appliances to persons who have are sight impaired
- selling and supplying optical appliances to vulnerable adults

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Training and education of future registrants to be carried out by current registrants (i.e. educators are required to maintain their GOC registration and therefore their CPD to maintain currency)

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

An accredited refraction qualification for Dispensing Opticians/CLOs to allow (alongside a legislative change) the registrants to carry out refraction and recording of visual acuity.

In the industry there has been an increase in OO duties including minor eye conditions services and enhanced optical services whereby health checks on the eye are carried out by OO and CLOs. In response to this it would be beneficial to optical service users who have had eye health checks to have a separate refraction to issue a spectacle prescription (where the eye health has been checked within a set time period). Many Dispensing Opticians are already using refraction techniques when dealing with customer problems to ascertain the issue before booking rechecks with the OO which saves time a resource for the OO.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

In the review of the risk to the optical profession report (2010) it was noted that there were risks from unregistered members of staff which the GOC have no scope over. The requirement to register businesses with the GOC ensures that they must meet the GOC standards which include ensuring that the unregistered staff onsite have appropriate training to do their job. I feel this does not go far enough and, in a similar model to Pharmacy, a minimum mandatory qualification should be required for all working in Optical practice within 3 months of their start date, this would further protect the public when accessing Optical services.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Optical businesses should be registered to ensure that there is responsibility from the business to ensure non-registered staff are aware of the limits of authority and are trained appropriately for their role.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Businesses should have more responsibility to have appropriately trained non-registered staff and I feel that the expectation of being inspected would instill a need to ensure that appropriate training is carried out.

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

The GPhC model puts a clear responsibility on the named person to ensure delegated functions are carried out appropriately and patient safety paramount.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

Roles in the optical profession are evolving and there are more eye health only services (e.g. MECS) whereby refraction is not carried out but a full eye health check has been carried out. It would be beneficial to allow a separate refraction to take place (where an eye health check has been carried out within a set timeframe) to allow the optical service user to obtain a current prescription. Many Dispensing Opticians already carry out some refraction based tasks where an optical user is having issues with their latest prescription, this allows the issue to be identified ahead of the official recheck with the OO. Allowing DOs to carry out this function under the oversight of an OO would free up OO time for other clinical roles whilst ensuring the optical service user the best care. I feel that this should still be overseen by an OO so that should there be a need to refer to the OO there are available for assistance should something arise or be noted outside the area of DO expertise.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The advantage of allowing Dispensing Opticians to refract:

Reduce OO workload putting a greater emphasis on OOs carrying out Eye health checks

Increase availability of refractive checks where optical service user wants to update spectacles, is not formally due for their eye test but enough time has passed that they would prefer to check the prescription is still current.

Disadvantages:

Potential for larger businesses to make a less favourable customer journey requiring separate appointments for eye health check and refraction.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The disadvantage of keeping the current legislation would be restricting the growth of the optical industry.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

My experience in a large multiple is that OOs have taken on more clinical roles and it would make sense to allow refraction as a delegated function to free their time up. By allowing DOs to carry out refractions there would be a greater emphasis on this specific task ensuring that the patient needs and preferences are dealt with. Being a registrant means that the GOC would still have regulatory power and standards of practice would ensure that DOs would always explain the differences between eye health checks and refractions and the importance of having regular eye health check ups minimising risks of patients choosing not to have eye health checks.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Contact lens fitting ensures that patient have regular check ups for CL as well as eye health which protect the public. Zero powered contact lenses should have the same restrictions.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

More regulation would be welcomed to ensure that vulnerable adults have their specific needs addressed by a professional registrant. Those registered by the GOC have a professional obligation to remain up to date with professional standards including safeguarding vulnerable persons as well as communication techniques to ensure correct consent, understanding and patient expectations.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Further restricting the sale and supply to vulnerable adults would potentially mean that more professionally registered staff are required to oversee those activities. In businesses where only GOC registrants carry out sale and supply would see no impact but businesses that rely heavily on non-registered staff may incur greater wage bills to ensure enough professional staff available.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

advantage to customers to give easier access to purchase contact lenses

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Duties to be performed during Contact lens Aftercare

- To perform examinations on the eye for the purpose of detecting injury, disease or abnormality of the anterior eye in relation to contact lens wear
- To perform examinations on the quality of vision with contact lenses
- To provide a Contact lens specification detailing the Contact Lens Make and parameters upon completion of examination

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Whilst the legislation is clear that zero powered contact lenses can only be supplied under the supervision of a registered professional it would be in the patients best interest to have been fitted with the Contact lenses and have regular check ups. Zero powered cosmetic lenses (halloween designs etc.) are still being sold without any checks that the lenses are suitable for the individual or advice on minimising risks associated with contact lens wear.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Additional legislation to ensure those purchasing zero powered contact lenses are given appropriate advice and guidance on minimising risks associated with contact lens wear and shown how to remove and insert lenses safely would be beneficial.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would be beneficial to require proper fitting and check ups for zero powered contact lenses so that patients have advice and guidance on how to reduce risks associated with contact lens wear and know how to insert and remove them safely which may not be the case for retailers of costume/cosmetic contact lenses.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Online sales, in particular retailers outside of the UK, are not being dealt with where the regulatory restrictions are in place.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It is possible for customers to purchase contact lenses without a specification which can lead to a higher risk of contact lens complications if they are not advised properly during a fitting process.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Customers at the moment have assurance that their optical appliances are correct given the legislation in place. Customers ordering spectacles online are often unaware of the implications of incorrect measurements for PPLs or high powered lenses who then come back to the prescribing practice believing that their prescription is incorrect when in fact the measurements are causing their visual discomfort.

If the onus was placed on the customer I believe there would be a higher incidence of unsatisfied customers. Leaving the onus with the supplier ensures that they have responsibility to ensure that the supplied spectacles are suitable for the purposes intended.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Having a 2 years restriction for non-registrants ensures that should a pair of spectacles be required outside of these parameters that a registered professional can give the right advice and guidance to ensure that the patients best interest are met, and can still make a pair of spectacles outside of this 2 year period if that is in their best interests.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Non-registrants do not have the same level of knowledge as professional registrants who have had to complete specialist qualifications nor are they bound by GOC code of ethics. In most cases there would be a registered professional onsite which could be referred to in these instances to ensure that the patients needs are met. This may include making up a new pair of spectacles outside of the 2 year period or it may include guidance to have some additional check ups prior to purchasing glasses especially where there is reasonable reason to believe the prescription may have changed. Professional registrants are more likely to consider the wider picture to ensure that the patient is given the correct information and guidance to make an informed decision before making glasses to a prescription over 2 years old.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The disadvantages are that patients may have to wait longer to speak to a registered professional before their glasses can be made up.

The advantages are that the patient will receive the right advice and guidance to make an informed decision.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

most sports eyewear is fully adjustable and therefore in most cases the fitting requirements are not as complex as other eyewear.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

being able to purchase sports eyewear would give greater accessibility to those products.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

advantages would be greater accessibility to sports eyewear

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Remote care can give greater access to services when an in person visit is not possible however I feel that in the majority of cases an in person examination is more appropriate.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Remote care is a good way to provide care and advice and guidance however in many cases an in person check up would be the best option as patient descriptions of their eye health issue or concern may not reveal important information that could be seen during an in person check up. I believe that should remote care become the normal that there should be maximum timescales applied before an in person check up is required. For example with remote contact lens aftercare appointments a patient may have no symptoms or issues with comfort or vision but an in person check may have revealed staining or neovascularisation that requires intervention.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Where remote care used there should be maximum time periods before an in person check up is required to ensure that in person checks can be carried out to aid the detection of asymptomatic issues.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

n/a

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Whilst business registration does mean that business owners have responsibility for their non-registered staff more should be done to ensure that there are minimum education requirements.

I would like to see this follow a similar route to the GPhC education requirements for non-registered staff to be enrolled onto an approved education course within 3 months of starting employment. Whilst non-registered staff often work within an optical retailing environment there is a need for them to have a good understanding of the eye, eye conditions and signs/symptoms to ensure that they know the limits of their authority and when to refer to a registered professional. There is also a need for them to understand spectacle prescriptions, visual acuities and conditions that affect sight to be able to dispense spectacles effectively but also know the limits of their expertise and when to refer to a registered professional.

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I believe a legislative change to ensure a minimum level of training is required when working within an Optical environment to ensure that all that work within the industry have a base level of understanding as well as an awareness of the limits of their authority and when to refer to a registered professional when it is outside of their authority or expertise.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Minimum levels of training required for non-registered staff

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction for the purpose of prescribing optical appliances
Autorefracton for the purpose of prescribing optical appliances
Examination of the eye as part of a sight test (by whatever means, including inspection of images) for the purpose of detecting disease
Fitting and prescribing of powered contact lenses
Dispensing of optical appliances to under 16s

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Seems to be similar question to 6, except for "should" and "must". The term "should" must not be used since it is open to interpretation.

Refraction for the purpose of prescribing optical appliances
Autorefracton for the purpose of prescribing optical appliances
Examination of the eye as part of a sight test (by whatever means, including inspection of images) for the purpose of detecting disease
Fitting and prescribing of powered contact lenses
Dispensing of optical appliances to under 16s

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Not sure / no opinion

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Question number 8 is too restrictive in its choices. I never did see a major issue with non-registrants selling to the visually impaired, but there are some very poorly-fitting glasses dispensed to children, even under the current restrictions. De-restricting the sale to under 16 could have serious implications for a child who was unable or unwilling to wear a correction.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

This would discourage people from choosing to have a full eye examination, and hence allow disease to go undetected. We already see this in patients who present with advanced glaucoma in our glaucoma clinic - they have saved money by buying ready-readers, but it has cost them their sight.

You also need to consider whether Orthoptists should be allowed to refract. It is well known that in at least one hospital Orthoptists have been refracting children and an Ophthalmologist signs the prescription (or allegedly hands over a bunch of ready-signed prescriptions).

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

This would discourage people from choosing to have a full eye examination, and hence allow disease to go undetected. We already see this in patients who present with advanced glaucoma in our glaucoma clinic - they have saved money by buying ready-readers, but it has cost them their sight.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Some clarity would be helpful around Optometrists in a hospital setting carrying out sight-testing for diagnostic purposes, rather than for prescribing.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Only anecdotal around ready-readers and late presentation with eye disease.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The requirement for a patient to have a current sight-test before contact lens fitting causes problems in hospital contact lens clinics when patients refuse to have a sight-test. carried out by their own Optometrist.

The hospital optometrist then has to either carry out a sight-test themselves (for which they are not really set up) or refuse to fit contact lenses which disadvantages the patient.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

as above

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Contact lenses by their very nature can harm the eye.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

not sure

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Examination of the fit, power, lens care, cornea and adnexa, wearing schedule, lens condition, assurance/evidence of a current eye examination or written advice regarding its importance

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

don't know

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Same as earlier question, late presentation with advanced eye diseasedon't know

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

don't know

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Depends what is meant by sportswear. Swimming goggles pose little risk while glasses for impact sports or where high-speed balls are a problem need to be dispensed properly.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

as above

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

don't know

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Status of magnifiers for the visually impaired is a grey area and needs clarification. Is an electronic magnifier an optical appliance?

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There is a balance to be struck between making magnifiers readily available to those who need them, and discouraging people from seeking a professional opinion if their sight deteriorates

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

n/a

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Only that I seem to see an awful lot of poorly-fitting glasses on TV (on [redacted] for example)

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

no

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Insufficient recognition of the fact that there are hundreds of Optometrists working in hospital eye departments where things are done differently from the high street. For example, if a patient has seen, or is due to see, an Ophthalmologist, does the optometrist have to do a full eye examination or can they just do a refraction?

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Education provider

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

dispensing children, LV, CLs, partially sighted patients.
testing of sight

7 What activities do you think must be restricted to our registrants?

Please provide details.:

should stay as it is.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

should be accredited as already done.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

allowing any non registrants to open optical practices will cause the quality of patient care and services to decrease. We must keep business regulation as it is.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

DO's shouldn't be able to refract as the quality of the profession will decrease. Patients will be at increased risk as sight tests will be split and regular health checks could be missed. This in effect will put pressure on the NHS.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

There are NO advantages to amending so DO's can refract.

DO's should remain restricted from the functions of testing sight as previous.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

should remain as it is.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

no data specifically but feel it would reduce the quality of service and skills which at the moment remain at a high standard.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

expert knowledge and skills by registrants. Rather than just buying over the counter.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

poor quality service and risk to patient safety and registrants will have no protection from GOC.

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

- Performing an eye exam
- Dispensing of prescription spectacles without the supervision of a registered person (either in practice or online)
- supplying contact lenses (either in practice or online)

7 What activities do you think must be restricted to our registrants?

Please provide details.:

A limitation on the number of persons being supervised in practice, when the dispensing of spectacles is taking place.
So for example,

1 Dispensing Optician for every 3 non-registered dispensers in practice, to ensure the supervision of dispensing can be accurately done.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

A limitation on the number of persons being supervised in practice, when the dispensing of spectacles is taking place.
So for example,

1 Dispensing Optician for every 3 non-registered dispensers in practice, to ensure the supervision of dispensing can be accurately done.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Emergency Eyecare, specifically red eye symptoms / when to refer etc.

An accreditation for all registered Contact Lens Opticians and Dispensing Opticians.

As on a occasions the above persons are dealing with the associated incidents before an Optometrist is available.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

An accreditation for refraction would be needed in such case

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantage would be to give more scope to dispensing opticians.

Disadvantages would be negligible

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safety of the public
Protection of the professions

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Safety of the public
Protection of the profession

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Complex Prescription
Under 16
Low Vision

All above for the safety of the public and the protection of the profession

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

All above for the safety of the public and the protection of the profession

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Public safety would be at risk, if unregistered bodies supplied contact lenses, without any regulation!!!

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Allowing unregistered bodies or supply Plano contact lenses would raise the risk to public safety.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Sale of glasses by unregistered bodies will raise the risk to the public. Prescriptions should be verified by a qualified DO/Optom before supply

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Risk to the public if prescriptions are not verified by a qualified DO / Optom

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There should be more regulation. Specifically via online ordering of spectacles.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Risk to the public by prescriptions not being verified by a qualified optom/DO.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

More regulation needed for online purchasing

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

More regulation needed for online purchasing

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Public at risk by ordering unverified prescriptions online. More regulation would minimise this risk

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The public are able to order unverified prescriptions.
Overseas companies are able to bypass UK law and sell unregulated products

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

More control on overseas companies using e commerce in the UK.

All eyewear purchased online, needs to be verified by a copy of a valid prescription, signed by the Opom/DO

All contact lens sales online, need to be put through the same as above

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Business registrant/employer

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Under 16 dispensing

Clens supply

Complex Rx

Dealing with vulnerable patients

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dealing with vulnerable patients

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Required for patient safety

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Vulnerable patients

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Online sales are not regulated and policed

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not Answered

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

We see patients who experience problems from online sales.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not Answered

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

They are protected.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Other - please specify

If 'other', please specify.:

[redacted]

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Must remain restricted different qualifications gained at Uni for different roles. We cannot just change the roles to suit multiple practices detrimental to Px care

Titles should be protected but scope of practice could be changed

OO/DO as a protected title is vital to maintaining public perception and standards of practice within the profession.

As a professional body our role has already been devalued by using 'supervising d.o's' over unqualified dispensers for many years to the detriment to the trade & the patient care.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Extra training and courses should be respected

Currently the addition qualification skills are enough, but this should be expanded as technology and knowledge advances (eg skills in detecting pathology using new technology)

Both med Ret and glaucoma as well as the potential addition of further qualifications should be added in order to encourage upskilling within our profession for better patient care

If practitioners who have these qualifications feel that they need to be recognised by the GOC for having those extra qualifications, then I can't see a problem with that. Will they pay extra for their GOC subscription fees each year as they are more qualified, therefore taking on more responsibilities?

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not Answered

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

100% no

People will just get glasses and disregard the health.

How will nhs find this process they don't even cover the cost of a full eye exam at present

More diary time wasted

More skills amd practitioners undermined

How can you detect a retinal detachment or pathology through a refraction alone ? Not good for the patient or traditional buisness models

This is not in the patients best interest and is playing to multiples who want to get px in and out as quickly as possible and happy to pass them from pillar to post

Refraction and eye health go hand in hand. It is essential to understand the health of the eye to accurately and appropriately refract eg in cases of cataract (but also many other conditions). It takes far more skill than a simple refraction to give each individual the best visual outcome.

More time efficient. Dealing with the presenting problem

Broadly yes. However I believe this would have to be implemented very carefully and patients, particularly with risk factors for ocular disease, should not be allowed a refraction appointment without a subsequent health check to ensure best patient care and pathology detection

It is safer for the patient if they have a eye health check done at the same time as a refraction. If this vital part of the eye exam is taken away, there will be members of the public who will not have an eye health check carried out and risk losing their vision in the future, creating a burden on already stretched NHS health services.

One comes along with the other.....they need to go hand in hand.

I will quit being an Optom and change profession if refraction is taken away from me. I trained long and hard for my title for my degree and for my patients and if I will be undermined by a machine or non qualified registrant I have no interest in this career

In the UK there is a lack of ophthalmologists to care for people's eye health needs. Optometrists in the uk are vital to provide good value eye care to the uk population. If the GOC change their rules and split refraction and eye health checks, there is a risk that the general public will not bother getting their eye health checked until it is too late, when they have irreversible sight loss. This will put severe pressure on an already overstretched NHS service and also risk losing optometrists from the community if local practices cannot compete with online competition.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Yes to Stop illegal sale of appliances online

Without registration the quality of services provided cannot be adequately monitored and controlled and could ultimately lead to poor practice.

Any practice providing optical services should be registered in order to maintain the same high standards as other practices/businesses are required to

That is not in the patients best interest

Similarly to question 14/15 - should be done with care but Particularly for lapsed wearers or those with no ocular risk factors, virtual/phonecall consultations should be sufficient. Particularly with soft single vision lenses where most fit the same regardless of manufacturer/material.

Same reason as above

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Vulnerable patients.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Why ever qualify as CLO if it doesn't mean anything? How will you change the title and role of people who have undertaken further training - salary change? How is this fair?

Particularly for lapsed wearers or those with no ocular risk factors, virtual/phone call consultations should be sufficient. Particularly with soft single vision lenses where most fit the same regardless of manufacturer/material

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Internet supply is not monitored and Rx not checked

On line companies are not regulated and often provide cls without copy of specification

The current guidelines are good, but too many patients bypass the system (eg cheap contact lenses purchased from outside the uk online). There has to be some better way of protecting patients.

Online purchasing is completely unpoliced

It would be best if the general public could only buy contact lenses online once they have had a valid contact lens check at a registered opticians, however this is hard to regulate if online contact lens suppliers are not based in uk.

Selling CL's through foreign sites to UK customers needs tightened up

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not Answered

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Still a lens being put into the eye - potentially causing ocular health issues

Too many eye infections have resulted from zero powered contact lenses. It would be a step backwards to allow these to be sold by unregistered outlets.

It is not policed therefore until proper regulation occurs contact lenses will continue to be bought online

The most common Plano lenses; Coloured contacts are known to be a significant portion of microbial keratitis and have awful dk so should be fitted and discussed with an appropriate registrant.

We see people in practice occasionally who have bought contact lenses online and have had problems with them. If they had them fitted properly at an opticians and told how to handle and care for their lenses, then they would be less likely to have issues such as eye infections and risking losing their sight and taking up valuable time at A&E departments and in primary care settings sorting out problems that could have been avoided.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not Answered

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

More technology less human knowledge and contact. Will turn into a machine in and out factory

I think new technology such as auto refraction and fundus photography and OCT scans can be used to streamline and enhance the current normal eye exam available, but overall refraction result and eye health consultation needs to be finalised and overseen in practice by a registered optometrist. If the whole process of an eye exam can be streamlined more, this would enable optometrists to see more patients and solve any capacity issues in the future, with an ageing population with increasing eye health needs.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not Answered

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Why ever qualify as CLO DO or a Optom if anyone can do the specific role

Are they protected or not??

Perhaps should be rx/age dependant. Under 7's and high rx's should still be supplied by a registrant but those outside the critical period of visual development are less vital

Same reason as above

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

Even under supervision is dodgy at the moment. A supervisor from an office 4 floors above or in some cases in a different store? Not really following the regulations so by easing the rules just make it easier for people to manipulate the rules

This would again be a step backwards. If we want to give the population excellent eye care this extends to giving them appropriate eyewear supplied by qualified practitioners.

What would be the need to qualify as a dispensing optician. It waters down the profession

Poor fitting or wrongly dispensed spectacles to children under the age of 7 with a high rx could easily lead to life long amblyopia if they were left in the 'wrong' specs for long enough.

Risk to public if they get glasses made up incorrectly by an unregulated supplier.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

testing sight
fitting contact lenses
selling optical appliances to children under 16, including sports eyewear
selling optical appliances to people registered as visually impaired
selling zero-powered contact lenses

In addition, the GOC should take account of developments in practice that have occurred since the legislation was last reviewed and prevent non-registrants from carrying out the following activities either directly or under supervision:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:
highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:
is long-term and potentially expensive
has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia
may be of value to patients who are over 16, as well as to children.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear

selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

highly-developed communication skills,

expert dispensing skills, taking into account factors such as facial characteristics and posture

an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour

an ability to judge the decision-making capacity of a patient

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

is long-term and potentially expensive

has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia

may be of value to patients who are over 16, as well as to children.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

Yes, there should be a consistent approach to business regulation, recognising that some activities are within the control of businesses as opposed to individual registrants, such as ensuring that:

there is the right balance between clinical and commercial incentives

there are appropriate standard operating procedures

equipment is maintained correctly and staff are properly trained to use it

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

No, when the GOC considered this question in 2013 it concluded that the risks associated with business practices did not warrant an inspection regime. Since then, the GOC has strengthened the system of business regulation by introducing more comprehensive business standards that make clearer its expectations.

In the absence of evidence that the risks associated with business practices have increased and analysis showing that it is necessary and proportionate to introduce an inspection regime, the case for doing so has not been made.

As a general rule, the GOC should think very carefully before increasing the costs of regulation and these will ultimately be passed on to patients.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

Should be a 2 tier sight test.

Refraction only.

Full sight test only.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The training needed to enable dispensing opticians to carry out refraction as part of the sight test would also be limited. They already learn about refraction as part of their initial education and [redacted] would provide additional training so members' skills and knowledge are up-to-date. The GOC's new outcomes for registration will ensure that future DOs are fully versed in refraction from the outset.

Enabling dispensing opticians to support optometrists and medical practitioners in carrying out sight tests would enable patient care to be provided in a more flexible way while upholding the principle that a sight test should involve both a refraction and an eye health examination.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No progress

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Yes, the sale and supply of optical appliances to certain groups of vulnerable patients should be further restricted so that it must be carried out by a registrant. Such patient groups should include people with learning disabilities or dementia because dispensing optical appliances to such patients requires enhanced skills and knowledge.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing optical appliances to people with learning disabilities or dementia requires enhanced skills and knowledge, including:
highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
understanding of medical conditions

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Catastrophic

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Problematic

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No, the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 does not create any unnecessary regulatory barriers.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These restrictions are necessary to protect the public and should be maintained. We do not agree that the fitting process for such sportswear is 'not as complex' as for spectacles or contact lenses. Sports eyewear is fitted not only to ensure optimum vision but to afford protection to the wearer. Therefore, it is more rather than less complex to fit, requiring detailed questioning about usage and enhanced dispensing skills to ensure a safe, optimum fit.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The call for evidence also suggests that the restrictions might be unnecessary because sportswear is 'usually only worn for short periods'. While diving masks, swimming goggles or sport goggles can be worn for short periods, they can also be worn over an extended length of time. In any case, if such optical appliances have not been fitted correctly and/or appropriate advice has not been given, there is clearly an increased risk of harm if a child is unable to see clearly under water or is wearing a poorly fitting pair of rugby goggles. This could also result in harm to team members or competitors.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/a

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

/a

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/a

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Allowing Dispensing Opticians to refract, albeit at the request of an optometrist, is not in the public interest. It will result in reduced protection for the public.

So many conditions and problems requiring referral for onwards care are detected in 'routine' sight tests for patients who simply thought they needed new glasses. Optometrists are best placed to provide examinations. This would lead to confusion in the public as to who is actually testing their eyes.

Those businesses/opticians who are 'sales driven' will use this to provide cheap/free 'tests' simply to drive spectacle sales. It would also likely lead to further real-world reductions in the NHS sight-test fee.

The GOC need to be aware of the groups that are promoting further deregulation. It may be in the interests of certain businesses as far as reducing the costs of 'retail' optics, but is patently presenting further risk and confusion to the public.

Further deregulation also plays into certain political aims since it presents a powerful argument for the reduction in NHS sight test fees. The GOC should be there to represent the interests of registrants alongside the interests of the public, not pushing for change that weakens both.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Not Answered

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Allowing Dispensing Opticians to refract, albeit at the request of an optometrist, is not in the public interest. It will result in reduced protection for the public.

So many conditions and problems requiring referral for onwards care are detected in 'routine' sight tests for patients who simply thought they needed new glasses. Optometrists are best placed to provide examinations. This would lead to confusion in the public as to who is actually testing their eyes.

Those businesses/opticians who are 'sales driven' will use Dispensing opticians to provide cheap/free 'tests' simply to drive spectacle sales at the expense of the public's safety.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Allowing Dispensing Opticians to refract, albeit at the request of an optometrist, is not in the public interest. It will result in reduced protection for the public, who are already confused about who they are seeing.

So many conditions and problems requiring referral for onwards care are detected in 'routine' sight tests for patients who simply thought they needed new glasses. Optometrists are best placed to provide examinations. This would lead to confusion in the public as to who is actually testing their eyes.

Those businesses/opticians who are 'sales driven' will use Dispensing opticians to provide cheap/free 'tests' simply to drive spectacle sales at the expense of the public's safety.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Under 16's, vulnerable etc

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Qualified registrants (optometrists and dispensing opticians) are better placed to provide care for all members of the public, particularly those under 16, and the vulnerable.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not Answered

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not Answered

If yes, please specify what you think the definition of aftercare should be.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not Answered

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Not to sell contact lenses .

Not allowed to use autorefractors

Not to dispense under 16

7 What activities do you think must be restricted to our registrants?

Please provide details.:

None

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

None

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Dispensing Opticians have the skills and knowledge to be able to prescribe spectacle .I have passed the Optometry course for delegated functions and worked as prescriber in conjunction with an Optom .

Never had any problems with any delegated functions . [redacted] at [redacted] did the training .

However I stopped Delegated functions as optoms were against this .

Optoms have moved on in many diff fields now and it's about time for us to progress .

Have a ladder ,so extra qualification s progresses you further.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

We should be able to refract .My notes prev show it can be easily done .No restrictions .As a qualified refractor delegated functions CLO S can convert easily as refractors,

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Progression as for optoms dispensers sould progress .If we don't dispensers will be history .

Our skills to help optometry ,increase our skills for benefit of public.

We all will benefit .

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Refraction will go to non regulated in the future .Public will get refraction done and not eye test

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Stops serious eye conditions .These px walk in with problems and we have to correct problems at our expense.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

Under 16

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protection

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

X

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Aftercare is to protect px .

Without definition when explaining to px is more difficult

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

CLs are invasive with or without rx .so need same care

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

I see col cls Plano rx .usually severe infection

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Protect public

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

None

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Protect px

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Spec price will lower

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

X

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Protect

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

X

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not known

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

X

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

X

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Still no change with online contact lens retailer Gos done nothing about it.
Funding for Dispensing opticians for CPD like Optoms

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sell prescription products like contact lenses and glasses, sunglasses and lenses

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Nothing as professionals

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Everything optical related

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

That's what AOP and ABDO are for

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

They can't sort out online contact lens sales

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

Only an optical model will work

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes - with no restrictions

Please give your reasons and provide any evidence to support these.:

That what we did a qualification for

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Short supply of optom and being overcharged for there services and dispensing opticians do all the work

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not fit for purpose changing world flexibility required

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

40% at present but will rise due to population

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Should be able to be done by optom, dispensing opticians and contact lens opticians

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not fit for purpose

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

All patients should come under professional care

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Stop the cowboys online company's

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Fox do nothing about online retailers selling products with no prescription

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

No

Please give your reasons and provide any evidence to support these.:

Only be able to see optical professionals

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Stop online sellers, change to only from professional suppliers opticians only

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Online retailers never ask for verification of prescription so system not working that's why optician only

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

All check ups by professional opticians only

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

GOC do nothing a lot online retailers selling this product should b opticians only

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Opticians only

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

That don't have check ups with online retailers so why should be opticians only with recommend aftercare plans

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No fit for purpose as GOC do nothing about it so GOC not fit for purpose

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Professional advice and aftercare required

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Professional only

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Required for best health care needs annual eye test would be better like Mot on cars

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Prescription change being up to date is better health care

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not fit for purpose out dated

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Should be off all patients

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not being the best fitting and professional advice aftercare wha being trained for

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Multiple taking sort cut to save money

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Should all be opticians only

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not fit for purpose

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Online looking to do eye exams not possible need to be face to face for best professional eye care health

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Technology equipment to be used but not remotely as required face to face personal eye health required

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Optician only market is completely competitive already do not need online retailers

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Remote care not required

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

No remote care face to face always the best

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

GOC do nothing about them

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

GOC to do something about it and not bury head in sand

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Public should fund GOC as they are protecting them

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Business registrant/employer

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Non-registrants should be restricted from performing any acts or duties of a qualified Optometrist or Dispensing Optician.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The testing of sight (as defined by the Opticians Act)

The fitting of contact lenses

Sale and supply of optical appliances, including contact lenses

Dispensing of optical appliances

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The sale and supply of optical appliances should ONLY be conducted by registered optometrists and/or dispensing opticians i.e. the sale and supply of glasses via online retailers or "bucket shops" operated by non-registrants should not be permitted.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

All higher post-graduate qualifications should be approved/accredited by the GOC.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

Inspection of optical practices would be cost-prohibitive, intrusive, and disproportionate given the relatively low risk to the public of Optometrist/Dispensing Optician errors in comparison to the potential impact of errors made by other health professionals e.g. medicine.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Do not have sufficient knowledge of how other professionals are regulated to be able to answer this question.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction should not be conducted by anyone other than a registered qualified Optometrist, OMP or Doctor.
If Dispensing Opticians wish to be able to refract, then they should go back to University and study to be an Optometrist.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Refraction conducted by anyone other than a qualified Optometrist has the potential to overlook the presence of pathology in the eye or elsewhere, leading to unwanted and unnecessary ocular or systemic problems.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Optometrists should be able to deviate from the legal definition of a "sight-test" when the need arises e.g. if someone presents as an emergency with flashes and floaters, it should not be a legal requirement to conduct the refraction element of the "sight-test".

Anecdotally, I am sure that the vast majority of Optometrists would not conduct a refraction in this scenario, but it would be helpful to have this included in any new legislation so that Optometrists can "legally" use their own clinical judgement as to what is and what is not necessary based on the presenting symptoms/problems reported by the client.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No significant disadvantages.

Advantages are that clients will continue to receive eye health and refraction assessments by persons fully qualified to do so.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The fitting of contact lenses by those qualified to do so will only continue to benefit the public, there are no disadvantages to keeping the status quo.

Deregulating the fitting of contact lenses, or allowing this to be done by non-registrants has the potential to increase the incidence of significant contact lens related problems due to inappropriate fitting, advice and aftercare.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

The sale and supply of all optical appliances to ALL members of the public, vulnerable or otherwise, should return to only those qualified registrants i.e. Optometrists and Dispensing Opticians.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

By regulating the sale and supply of all optical appliances to all sectors of the UK public will ensure that high standards of dispensing are maintained and that the continual "race to the bottom" by large High Street chains, online retailers and bricks & mortar optical "bucket shops" does not continue to tarnish the reputation of the wider optical professional community.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

If these requirements were relaxed further then there could be a significant increased risk of harm to the public.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

But the GOC is toothless and completely ineffective at dealing with the brazen illegal sale and supply of contact lenses by non-regulated retailers and those acting "outside" of the UK.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The need to verify a contact lens specification (where one has not been provided by the fitting clinician or the clinician who has conducted the aftercare) is essential in ensuring clients are obtaining the optimal contact lenses for their requirements.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

If the regulations were relaxed then I would anticipate an increase in harmful contact lens related complications.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

The legislation should be tightened and enforced, which currently it is not.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No negative impacts.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

The sale of optical appliances should only be conducted by those registrants suitably qualified to do so. the sale and supply of optical appliances to the general public by any non-qualified person or persons should be illegal.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Risks include changes in refraction and visual acuity status not being recognised/identified; clients having vision that is sub-optimal and potentially below limit required to achieve driving standards; missed pathology; potential for increase in complaints due to sub-optimal VAs.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No negative impacts.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Increased risk of inappropriate advice by non-registrants; inappropriate/poor fitting; sub-optimal performance of the product for the required use.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No negative impacts.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

The sale and supply of optical appliances by non-registrants should be made illegal i.e. glasses, contact lenses and other optical appliances should only be available by registrants qualified to do so.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages are the continued high number of non-tolerances to varifocals, which is directly attributed to poor/inaccurate dispensing, a poor view of the optical profession in general as the High Street chains continue to put low cost above all other considerations.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The increased use of OCT in community practice; in my experience most optometrists have no formal training or qualifications that indicate they are familiar with interpreting OCT findings, which could potentially lead to unnecessary increased referrals to the HES ("red disease syndrome") or indeed pathology that is overlooked as the Optometrist doesn't understand how to interpret the scans.

Having worked for 15 years in a specialist glaucoma clinic that also dealt with other presenting co-pathologies, I had many years of experience interpreting OCT scans before obtaining one for my own practice. The locum Optometrists I have employed over the years have never had any formal training on interpreting OCT scan results. This is a problem.

All newly qualified Optometrists should be assessed on interpreting OCT scans, whilst other Optometrists already qualified should undergo some form of formal training or be able to prove they have "grandfather" experience gained elsewhere e.g. in the HES or they have been working in a practice that has had OCT for many years and they have "self-taught".

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I can only speak from my own experience of being an IP and DipGlauc optometrist. I firmly believe that my higher qualifications have only had a beneficial impact for my clients. My consulting room is probably better equipped than most HES departments. I don't believe I would be able to offer the same level of professional care without the suite of diagnostic equipment that I have invested in for the benefit of my clients, but I have the requisite skills and experience in their use and interpretation of results.

In my experience of being an HES Optometrist, we received many inappropriate referrals/false negatives on the basis of poor interpretation of results, especially visual fields and OCT scans. This has a negative impact in numerous ways, including increased anxiety caused to the client, added burden on an already stretched HES, and it reflects poorly on the optometric profession generally in the eyes of our medical colleagues.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The inability to accurately measure PD and other physical characteristics and parameters remotely. Dispensing is 80% science and 20% "flare", it is full of nuances, and is critical to the success of any self-respecting optical business. In my humble opinion, dispensing by unregulated online optical retailers should be made illegal.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

The sale and supply of optical appliances should only be conducted by registrants qualified to do so.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Supplying/selling of any optical appliances and contact lenses.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

same as above. the use of optical appliances should only be dispensed by OO/DO

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

dispensing of children and varifocals. Often these are done by OA with several unnecessary fitting issues.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

As a locum i have experienced working in high stress environments both in multiples and some independants. less than 20min sight tests are expected and ultimately is dangerous for the public. With inspections I feel lot of these issues could be detected.

I feel a minimum testing time of 30 minutes should be enforced in all stores, and 45mins in stores where OO carry out pre/post screening duties. I feel lessons from the past of cases of missed pathology/lack of thinking time/patient care are not being learned from.

Also my understanding is many of the FTP panel barely work in the large multiples and are out of touch with the modern high stress environment most OO have to work in, but yet are expected to provide oversight in the field? The entire process needs to be overhauled.

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

It would allow optometrists to become more pathology based however many pathologies are associated with changes in vision and refraction shifts which may now be more difficult to detect.

If this change is implemented correctly with enough time given to OO and DO then it may be successful.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The public perception may change that assuming good VA's and up to date refraction will assume having healthy eyes.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As a locum I have experienced working in high stress environments both in multiples and some independents. less than 20min sight tests are expected and ultimately is dangerous for the public. With inspections I feel lot of these issues could be detected.

I feel a minimum testing time of 30 minutes should be enforced in all stores, and 45mins in stores where OO carry out pre/post screening duties. I feel lessons from the past of cases of missed pathology/lack of thinking time/patient care are not being learned from.

Financial gain is most important in most stores. Trying to do a NICE approved sight test in 25 minutes is simply not possible. (including cover test, pupils, confrontation, accommodation assessment, refraction, volk in all 8 gazes). Many stores simply rely on OCT and 45 degree fundus image only.

Also my understanding is many of the FTP panel barely work in the large multiples and are out of touch with the modern high stress environment most OO have to work in, but yet are expected to provide oversight in the field? The entire process needs to be overhauled.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

fitting of CLs need to be regulated and monitored by OO/CLO to prevent obvious issues.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Public health remains at the forefront with CLs fitting. Easier access for DO's to become CLO's would be beneficial.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

As patients are free to buy CLs online of any brand and power, unless this is stopped the entire fitting process carried out by CLO/OO is pointless.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I don't think this applies as patients can buy CLS online with no proof of cls verification needed.

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Legislation would prevent potential sight threatening pathology and better public education.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

n/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

optical appliances need to be regulated. We are supplying products which patient will need to drive in and therefore essential that these are dispensed correctly

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

it ensures patients eye health and vision remain optimal

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It's important to consider of many drivers wear specs. This being checked regularly is essential for obvious reasons.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

perhaps changing the max recall period to 3 years between certain age groups may be viable. but in the elderly cataract/amd development needs to be monitored more closely.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

widefield photography and OCT (newer [redacted]) only should be acceptable as a means of posterior retinal pathology assessment, as this is mostly done with patients in the HES. (dilated if necessary to obtain a clear image)

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

With the right technology as stated above it can be used to assess certain aspects of eye health alone. However a slit lamp examination is still required to anterior/vitreous assessment.

At the moment I know many OO simply rely on 45degree fundus imaging and macula OCT as the sole means of funduscopy (no volk done mainly due to time pressures of 20/25min testing)

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Only certain approved technologies should be accepted if technology only is going to be used to funduscopy. Widefield imaging is essential as the risk of missed pathology with normal 45 degree photos is too great.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

as above

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

na

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

As a locum I have experienced working in high stress environments both in multiples and some independents. less than 20min sight tests are expected and ultimately is dangerous for the public. With inspections I feel lot of these issues could be detected.

I feel a minimum testing time of 30 minutes should be enforced in all stores, and 45mins in stores where OO carry out pre/post screening duties (a large poll was taken in optician magazine a few years ago about this). I feel lessons from the past of cases of missed pathology/lack of thinking time/patient care are not being learned from.

A store I completed my pre reg and worked in gave 20mins for sight tests (director 30mins, and CLO/DO director 40mins per patient for CL clinic). We can hardly be surprised that the patients health is put at risk. If contacted id lover the opportunity to help make change in the industry regarding these common issues.

Financial gain is most important in most stores. Trying to do a NICE approved sight test in 25 minutes is simply not possible. (including cover test, pupils, confrontation, accommodation assessment, refraction, volk in all 8 gazes). Many stores simply rely on OCT and 45 degree fundus image only.

Also my understanding is many of the FTP panel barely work (store directors often give themselves longer testing times so cannot relate to pressures felt) in the large multiples and are out of touch with the modern high stress environment most OO have to work in, but yet are expected to provide oversight in the field? The entire process needs to be overhauled.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

as above

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Children / vulnerable adult dispensing and eye examination

Ocular health checks

Prescribing ocular medication - advice giving on ocular disease

7 What activities do you think must be restricted to our registrants?

Please provide details.:

U16/ vulnerable adult eye exam & dispensing

Contact lenses assessments, check ups. Lenses should not be available online

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

no

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

NA

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Reduced numbers of eye exams carried out as there are less optometrist available Which increasing waiting times for people getting an eye exam.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

5%

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

People can just buy lenses online and this is not regulated

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Yes

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

NA

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Member of the public

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Title of calling themselves an Optometrist should be restricted

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Not sufficiently informed to make a decision.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

As I understand it the sale/provision of lenses is only allowed via a Registered Optometrist currently; I think this position should be maintained.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Not sufficiently informed on this subject to form a logical representation.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Not sufficiently informed on this subject to form a logical representation.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Not sufficiently informed on this subject to form a logical opinion.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think this is a logical conclusion.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Not sufficiently informed on this subject to form a logical opinion.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Not sufficiently informed on this subject to form a logical opinion.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Not sufficiently informed on this subject to form a logical opinion.

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Not sufficiently informed on this subject to form a logical opinion.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Student optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

CL fitting and aftercare, U16 dispensing, SI/SSI dispensing, complex Rx dispensing, Sight testing (including refraction)

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Registrants activities should be expanded within secondary care (drops, injections, monitoring)

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Complex lenses and px with BV issues!

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes - under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I am a Dispensing Optician and student Optometrist: my personal opinion is that refraction even though seems simple, is not! DOs need to incorporate a tailored case history before refracting (previous problems with the specs, family history of myopia, previous changes in rx, BV impact of any changes). In general this task is better if done by an optometrist as the practitioner gets a better picture when utilizing health, case history and refraction together! DOs can refract easily a refraction error (typo, retest)

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Any changes should focus on DOs and OOs having the right tools to expand their expertise in the benefit of the public (without affecting negatively the care our patients get)

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Stops both DOs and OO expanding their expertise

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

I am relying mainly on my experience as a qualified Dispensing Optician and student Optometrist

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages would be that patients get best care with balanced clinical and retail focus. Removing the restrictions will lead to a more retail focused. If the restrictions are removed I would advise harsher penalties for the multiples (especially) and independents opticians! As we all know from experience they can get very greedy at the expense of the public!

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Yes, as DOs and OOs are better trained at spotting non verbal messages and have a more comprehensive knowledge and skills of doing the appropriate thing to give best care to that specific patient

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Registrants understand the impact of rx changes and errors on the BV of a patient, and follow the appropriate course of action! Non-registrants are more retail focused and more easily influenced by the retail focused directors (plus they don't have a registration to lose) at the expense of the public. It's even more important for patients under the age of 6, as if a big rx error (typo?) is not spotted can lead to amblyopia, even worse if frame and measurements are wrong on high rx

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

The balance between clinical and retail focus will lean towards retail at the expense of the public

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Contact lenses restrictions can be relaxed for DOs as they will do what is clinically right for the patient as they have a registration on the line to lose if they don't

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Especially younger patients are at risk, we are there to reduce that risk. Without us there will an increased risk of sight loss

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages:

-retail focused directors

-younger CL wearers lack of maturity and lack of information leads to an increased risk of sight loss

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Missing health issues that can be sight threatening, driving when not legal to

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We have the special circumstances that is enough to allow us to dispense an expired rx, it needs no further changes. Myopia is and will further become a major issue-so 2 years is a good timescale to keep risks within a manageable range

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Again registrants understand the impact of any prescribed/dispensed mismatch can have on a px BV. Non registrants have no registration to risk so nothing that stops them to break rules

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Keeps dispensers doing what is right for the px and business alike.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage: patients get what is right for them

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Standard of spectacles lenses are not followed and that comes at the patients cost (clinical and financial)

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Better policies that benefits the patinets

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment,

pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

eye examinations or any part of an eye examination that requires a subjective response or clinical assessment/ dispensing to children/ dispensing safety specs/ dispensing LVAs/ telephone triage/ dispensing of contact lenses/

7 What activities do you think must be restricted to our registrants?

Please provide details.:

eye examinations or any part of an eye examination that requires a subjective response or clinical assessment (restricted to Optometrists)/ dispensing to children/ dispensing safety specs/ dispensing LVAs/ telephone triage/ dispensing of contact lenses (restricted to Optoms and speciality trained DOs)

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Certain screening tests - especially that require a subjective response ie colour vision testing and stereo testing - should be limited to optometrists

Telephone triage of eye problems - support staff should be aware of when optometrist intervention is required and a system in place for optom to triage calls (or noted as a supervised function - ie further training is undertaken by support staff - in fielding MECS urgencies and other urgent eye probs).

Refraction should be restricted to optom's only - It clearly makes up part of the clinical assessment - I cannot envisage a situation where it is in the best interest of a patient to have an underqualified person conduct part of the clinical test

Recognising/ investigating anterior eye disease - Optometrists and speciality trained dispensing opticians (ie contact lenses)

Fundus examination and interpretation of digital imaging of the eye - optometrists only

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

I believe this question is in regard of whether Dispensing Opticians should be allowed to refract in certain situations. I do not believe this is needed.

There is no clinical benefit to a patient in having this situation. I can only see a commercial benefit - the argument for freeing up Optometrist time in order to spend longer on clinical tests for example clearly shows that the time pressure on an Optometrist - which is due to commercial need to see around 15 - 20 patients a day due to the GOS fee and eye examination fee being sub standard. We could have a similar GOS structure to that in Scotland for instance, where Optom is remunerated if conducting further tests - ie dilating miotic pupils,

I fear this is the start of deregulating the eye examination which would be a huge backwards step in how we currently deliver eye care

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

My personal opinion is that GOC registration should be compulsory to all businesses conducting restricted procedures on their premises. In the same way as an Optometrist or Dispensing Optician must be registered to practice so the business should be registered and agree to the key principles of code of conduct for business. Protecting the autonomy of the practitioner is paramount to protecting patients.

My evidence: In 2011 my employer put pressure on me to sell by telling me I should tell patients who had been advised no change that there had been a change.

I eventually complained to GOC about this point but it was felt by the GOC there was no case (despite my employer demanding I break the Opticians Act and therefore the law) to answer as my employer apologised in writing using the excuse of heavy handed management style. At the same time, a Locum Optom working in the practice told me if his clinic did not achieve a 75% sales/tests figure he would not be asked to return. Later the GOC added clearer guidelines about pressure to sell etc which I think would have deterred my employer and saved me and my colleagues a considerable amount of stress if guidelines had been clearer at the time.

Other evidence would be examples of regularly being expected to perform 15 minute eye examinations for children or "squeeze in" further investigations such as fields tests or dilations and being expected to perform eye examinations in practices without proper working equipment.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Positive impacts are ensuring protection of the public if business owners are given clear guidelines to ensure management decisions do not negatively impact patient quality of care.

Practitioners (employed or Locum) can work with autonomy and be confident they would not be pressured by the threat of Capability management procedures or loss of offered work based on sales figures or requiring more time to perform certain tests.

Negative impacts are costs to individual businesses. There will be a disproportionate cost impact on smaller independent practices run by non qualified directors especially if Section 3 (29) practice principal is compulsory.

The cost implication of allowing time to perform all needed tests especially with additional services and the added time pressure of the administration of systems such as " [redacted] " - which invariably falls on the practitioner will threaten many smaller businesses. It is an argument for the eye examination fee not being fit for purpose - the attitude of the GOS fee structure meaning profit being in the sale of spectacles totally goes against the core value of the GOC patient safety first.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Inspections are part of providing a service to the public and should be expected as a way of ensuring that minimum standards are met. GOS inspection when starting up a business to gain the GOS contract then GOC acting much like CQC in how they investigate care providers.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Any arguments for allowing DO's to conduct a part of the eye test can only be commercial. It will always come down to a time saving exercise that would not be needed if the GOS fees model was rectified to reflect the changing face of Optics.

We can look at countries like France where seeing your Optometrist is much like visiting your GP. The GOS fee for eye examinations is far below standard when comparing to other developed nations.

The patient will often make comments during refraction which would alert the Optometrist to other problems and further testing which may well be overlooked by a DO who would invariably have 30 patients to see at 10 minute intervals in the busiest corporate practices. How the refraction is approached is often based on how the questions during "history and symptoms" are answered - would it be the DO now doing that part of the test too? Would the patient be expected to go through 2 lots of questioning during their test? I cannot see how this would ever be in the patient's best interest.

A DO wishing to refract can do so by applying to University/ career progression route and becoming an Optometrist.

This suggestion STINKS of an attempt to sneak up deregulation on the profession and I suspect those in the GOC board agreeing with it are affiliated with larger corporate eyecare providers.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Any arguments for allowing DO's to conduct a part of the eye test can only be commercial. It will always come down to a time saving exercise that would not be needed if the GOS fees model was rectified to reflect the changing face of Optics.

We can look at countries like France where seeing your Optometrist is much like visiting your GP. The GOS fee for eye examinations is far below standard when comparing to other developed nations.

The patient will often make comments during refraction which would alert the Optometrist to other problems and further testing which may well be overlooked by a DO who would invariably have 30 patients to see at 10 minute intervals in the busiest corporate practices. How the refraction is approached is often based on how the questions during "history and symptoms" are answered - would it be the DO now doing that part of the test too? Would the patient be expected to go through 2 lots of questioning during their test? I cannot see how this would ever be in the patient's best interest.

A DO wishing to refract can do so by applying to University/ career progression route and becoming an Optometrist.

This suggestion STINKS of an attempt to sneak up deregulation on the profession and I suspect those in the GOC board agreeing with it are affiliated with larger corporate eyecare providers.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The only point I can think of is that of fair remuneration for the GOS test - ie the Opticians Act states all tests needed to rule out disease should be carried out (ie cycloplegia in children/ dilation, fields testing in adults) - the additional cost of which is not reflected in the current GOS 1 fee.

Evidence for the above point - [redacted] postulated about 20 years ago that the true cost of an eye examination was £60. That figure is more likely to be closer to £100 now if not more. If further investigations are required to ensure no eye disease is present and those investigations lead to a referral rather than a dispensing of spectacles that leads to a huge loss to the business if 2 or more appointments are used but only 1 fee can be claimed by law.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Negative - GOS 1 fee is no longer fit for purpose - sight testing legislation prohibits Optoms for claiming additional charges to conduct a thorough test

Positive - Restricting the testing of sight to Optometrists protects the patient by ensuring the highest quality of care

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

THIS WHOLE QUESTIONING PROCESS SEEMS HEAVILY WEIGHTED ON ALLOWING DOs TO REFRACT - THIS STINKS OF DEREGULATION AND I SUSPECT CORPORATE DIRECTORS ARE BEHIND THE PUSH. I FIND IT DISGUSTING THAT YOU ARE EVEN ASKING US FOR OUR OPINIONS AS IT DOES NOT BODE WELL FOR THE FUTURE STANDARDS OF CARE IN THE UK

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Making it illegal for an untrained person to fit contact lenses ensures highest standards of safety and patient care. It is in the public's best interest to keep legislation in place as it is

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage - ensuring legislation around fitting contact lenses stays the same protects patients from individuals or companies who want to sell contact lenses unrestricted for commercial gain

Disadvantages - The only disadvantage is regarding patient's perceived "customer service" experience when you cannot give out contact lenses when a check is overdue and it would be illegal to supply in that instance.

Further disadvantage - changing legislation to allow fitting contact lenses or supplying without a prescription is the risk to public health of allowing ill advised patients to buy contact lenses that are potentially unsuitable - many who will then drive in said lenses and the risk to public safety ie Multifocals occasionally reduce VA's to below 6/12 and an alternative lens choice is made, the patient never takes the lenses. Also the risk to sight loss to patients overwearing cosmetic contact lenses often poorer quality oversized (ie tight fitting) high water content lenses which dry out quickly and increase risk of corneal ulcer.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Adults with learning disabilities -supply as for children ie DO or Optom or "under supervision"

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

often High prescription patients with complex medical needs and so risk of falls, may have different facial characteristics which make dispensing more challenging therefore a suitably qualified person should really be overseeing the dispenses

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

ensuring legislation around fitting contact lenses stays the same protects patients from individuals or companies who want to sell contact lenses unrestricted for commercial gain

The only disadvantage is regarding patient's perceived "customer service" experience when you cannot give out contact lenses when a check is overdue and it would be illegal to supply in that instance.

Changing legislation to allow fitting contact lenses or supplying without a prescription is the risk to public health of allowing ill advised patients to buy contact lenses that are potentially unsuitable - many who will then drive in said lenses and the risk to public safety ie Multifocals occasionally reduce VA's to below 6/12 and an alternative lens choice is made, the patient never takes the lenses. Also the risk to sight loss to patients overwearing cosmetic contact lenses often poorer quality oversized (ie tight fitting) high water content lenses which dry out quickly and increase risk of corneal ulcer. Or toric patients buying best sphere from an online "most suitable product" generator (ie [redacted]) then selling them a totally unsuitable product.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Don't know

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Make arrangements for providing aftercare could be a written statement handed out with each contact lens product reminding patients of the importance of continued aftercare and general information about who should be supplying that

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

risk of corneal infection from the overwear of contact lenses
seen many times in practice

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Making it easier for GOC to prosecute unlicensed sellers

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages are protection of the public

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

consumers are not advised and do not realise the potential risk of unregulated supply of contact lenses.

GOC cannot deregulate the supply of contact lenses to create an "even playing field" we are professional health providers and it makes a mockery of the basic principles of GOC standards of practice. The uneven field exists because illegal supply of contact lenses exists unchecked - there should be more emphasis on educating the consumer to the potential harms - not consideration in deregulation on the supply which will create harm to the public

simply pay to have a link high up on [redacted] search so when coloured contact lenses are searched the top few results are information/ warnings containing links to reputable sellers - I'm sure the large corporates would help pay for this if it meant the links sent traffic to their websites

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

specs used for driving need to be fit for purpose in public safety interest

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

benefits to the consumer as some patients just don't care as long as they feel they can see ok - the problem here is these patients trying to avoid the eye exam typically have a "devil may care" attitude to their healthcare, it is an inconvenience to them.

It is more important to better educate the public on why these rules are in place rather than remove the rules for convenience and commercial benefits

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

public protection

also should be something added that drivers MUST have an eye examination every 2 years

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

don't know

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

don't know

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

none

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

don't know

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

don't know

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

Submitted to Call for evidence on the Opticians Act and consultation on associated GOC policies
Submitted on 2022-06-06 18:54:24

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

Refraction is often related to changes within the eye, so shouldn't be separated from the rest of the eye examination

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction
Assessment of ocular health
MECS schemes and similar

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction
Assessment of ocular health
MECS schemes and similar

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Shared care schemes

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Impact on business

Patients would not want to pay extra for ocular health check

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Main advantage is that optometrists pick up ocular and other health conditions as part of a routine eye examination

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Ocular health is maintained by a professional

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Those with additional needs

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These people would be excluded if anyone could supply them

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Patients wouldn't want to pay for aftercare by an optometrist or CLO if lenses were fitted by an unqualified person

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unsure

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Full assessment of lens fitting and ocular health

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Zero powered contact lenses can cause the same ocular problems as powered ones so should be supplied under the same regulations

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

I have seen many examples of optical appliances made up incorrectly by unqualified persons

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Who would pay if an out of date prescription caused problems when made up?

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Incorrect manufacture could cause binocular vision problems

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No disadvantages

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction and health checks, they are inter-linked and should be optometrist duty only

7 What activities do you think must be restricted to our registrants?

Please provide details.:

See above

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should not be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Interpretation of pre tests, OCT. Etc

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction and eye checks are interlinked and both impact each other in different ways. This should be optometrist duty only

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantages - more px can be seen

Disadvantages- opens the door for directors / owners to slash wages while significantly increasing workload

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It's a model that works well, everyone understands their role

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

People who are specially trained as CLOs run their own clinic with full autonomy, allows for more px to be seen and fitted

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Unqualified people giving bad/wrong advice

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Anyone can get CLs that they may not necessarily need/ with the wrong prescription.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Optometrist supervision allows for full inspection and minimises errors/mistakes

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Non-registrants are not qualified to refract/understand the impact of their refraction

If a Rx is not dated within the last 2 years it is most likely going to be wrong/in need of a change

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight testing. Fitting of contact lenses and dispensing children and registered blind or partially sighted

7 What activities do you think must be restricted to our registrants?

Please provide details.:

As above. Sight testing supply and fitting of contact lenses Plano or rx and dispensing glasses to children, partially sighted and registered blind.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Supply of low vision aids. Treatments for dry eye like [redacted] and IPL

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

If DO's had wanted to refract they would have become Optometrists and there are plenty of conversion courses to facilitate this route. Many aspects of the final prescription are also tied to pathological findings and not just the refraction. By splitting the refraction and eye exam there is no benefit to the px only to the large multiples who will use it as excuse to drive prices down and pay less to their staff. This is a race to the bottom and I fear ultimately the patients will be the ones who suffer.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I can see no advantages other than in staff costs and our profession in real terms are now paying less than it did 20 years ago. The disadvantages are that it would promote a two tier system with DO's being asked to take on even more responsibility. If DO's are refracting who is dispensing or are we meant to over see that too? Not forgetting most DO's are also practice managers. The main impact I can see will be a dumbing down of the qualifications needed to perform an important task, with the main impact being on the general public

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The legislation ensures only those who have an all round understanding of the subject are able to deal with the public and that they are held accountable for their mistakes. It allows a high standard of care to be maintained

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

With more and more Optometrists qualifying I really see no need to change the status quo.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage of remaining the same is it would protect the public. More should be done in fact in protecting the public but regulating online sales

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Vulnerable adults and those with dementia or complex medical needs including those whose facial characteristics need to be taken into consideration

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The positive impact would be these groups would be dealt with by highly trained professional able to offer the very best understanding and solutions to their complex needs.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Px are always able to purchase contact lenses online often without proper checks being carried out. Parents are ordering lenses for under 16's who haven't even been fitted with it been given a contact lenses specification. Current wearers are also tweaking their prescriptions as they see fit and not attending regular check ups and all this happens with the current regulations in place!

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There are absolutely no positives and a whole bag of negatives similar to my answer above

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

A full check with a qualified optometrist or contact lens optician including health of the cornea, fit and prescription at the very least

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Px would refrain from having regular checks to obtain a new prescription and therefore any health issues may not be spotted until it's too late. Px may also not meet the driving standard

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Professional/representative body

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

The restrictions in place are adequate, and do not need either reducing or expanding.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The restrictions in place are adequate, and do not need either reducing or expanding.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The restrictions in place are adequate, and do not need either reducing or expanding.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

As time goes by further qualifications may need to be recognised by the GOC as Scope of Practice may expand, however to update the Opticians Act in this matter would be counter intuitive when it comes to future proofing (one of the appropriate objectives), and GOC / professional body guidance will suitably regulate any additional qualification etc.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Not Answered

Please give your reasons and provide any evidence to support these.:

In an ideal world all optical business providing optical services would be regulated by the GOC, however there are barriers to this which have been imposed which prevent this from being possible as it stands. Only with lifting of these barriers would it be reasonable to insist on all optical business being registered with the GOC in this way.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Not Answered

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction and health evaluation are considered by the professionals we represent to be intrinsically intertwined and therefore absolutely cannot be separated. Further we are extremely concerned that separating refraction and health examination could pose significant risk to the public health and cause confusion to the public. In light of this, we believe only an optometrist, pre-registration optometrist under supervision or OMP can carry out a sight test as legally defined in the Opticians Act. It may be possible with the advent of technologies for other team members within a multidisciplinary team to support the optometrist / pre-registration optometrist or OMP via technology, but it would be inappropriate for the responsibility for refraction and health examination to be held by separate people, no matter their qualification or training.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Refraction and health evaluation are considered by the professionals we represent to be intrinsically intertwined and therefore absolutely cannot be separated. Further we are extremely concerned that separating refraction and health examination could pose significant risk to the public health and cause confusion to the public. In light of this, we believe only an optometrist, pre-registration optometrist under supervision or OMP can carry out a sight

test as legally defined in the Opticians Act. It may be possible with the advent of technologies for other team members within a multidisciplinary team to support the optometrist / pre-registration optometrist or OMP via technology, but it would be inappropriate for the responsibility for refraction and health examination to be held by separate people, no matter their qualification or training.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Currently legislation ensures the public are protected as the testing of sight and evaluation of eye health are coalescent. We believe this must remain as it stands.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

a. Refraction and health evaluation are considered by the professionals we represent to be intrinsically intertwined and therefore absolutely cannot be separated. Further we are extremely concerned that separating refraction and health examination could pose significant risk to the public health and cause confusion to the public. In light of this, we believe only an optometrist, pre-registration optometrist under supervision or OMP can carry out a sight test as legally defined in the Opticians Act. It may be possible with the advent of technologies for other team members within a multidisciplinary team to support the optometrist / pre-registration optometrist or OMP via technology, but it would be inappropriate for the responsibility for refraction and health examination to be held by separate people, no matter their qualification or training.

b. Currently legislation ensures the public are protected as the testing of sight and evaluation of eye health are coalescent. We believe this must remain as it stands.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

Restrictions cannot be extended without a risk to disability discrimination. Professionals are able to oversee additional groups of at-risk patients as they see fit without this being mandated. To extend restrictions is unnecessarily restrictive and would make 'drawing the line' needlessly complex. Should registrants express a desire for support, guidance would be appropriate and welcomed.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Zero powered contact lenses have been shown to carry the same risk as prescription contact lenses, so it is appropriate that these are regulated as now to protect public health.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

AS NOW: Zero powered contact lenses have been shown to carry the same risk as prescription contact lenses, so it is appropriate that these are regulated as now to protect public health.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Zero powered contact lenses have been shown to carry the same risk as prescription contact lenses, so it is appropriate that these are regulated as now to protect public health.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Deregulation would increase public risk and could very easily become the catalyst for reduced safety measures in other areas within the optical sector.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

In exceptional circumstances optometrists or dispensing opticians are able to provide spectacles to a prescription which is over two years old. The process in place ensures the public are always encouraged to see a full sight test including health review and so no changes in this area are required.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

In exceptional circumstances optometrists or dispensing opticians are able to provide spectacles to a prescription which is over two years old. The process in place ensures the public are always encouraged to see a full sight test including health review and so no changes in this area are required.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

In exceptional circumstances optometrists or dispensing opticians are able to provide spectacles to a prescription which is over two years old. The process in place ensures the public are always encouraged to see a full sight test including health review and so no changes in this area are required.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Sports optical appliances in children should not be deregulated. Safeguarding is a key part of our work and we must do what we can to protect the sight of children.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Sports optical appliances in children should not be deregulated. Safeguarding is a key part of our work and we must do what we can to protect the sight of children.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Sports optical appliances in children should not be deregulated. Safeguarding is a key part of our work and we must do what we can to protect the sight of children.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The introduction of numerous modern technologies in both sight testing, dispensing and spectacle fitting proves that the current legislation is not restricting the integration of suitable technologies and innovations for the betterment of eyecare across the UK.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The introduction of numerous modern technologies in both sight testing, dispensing and spectacle fitting proves that the current legislation is not restricting the integration of suitable technologies and innovations for the betterment of eyecare across the UK.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The introduction of numerous modern technologies in both sight testing, dispensing and spectacle fitting proves that the current legislation is not restricting the integration of suitable technologies and innovations for the betterment of eyecare across the UK.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The introduction of numerous modern technologies in both sight testing, dispensing and spectacle fitting proves that the current legislation is not restricting the integration of suitable technologies and innovations for the betterment of eyecare across the UK.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

Yes, but GOC needs to take strong stance on quality of eyecare and have a great role and responsibility in maintaining good quality eye care is provided to the public.
The GOC, as with all regulators, has public and patient safety as its overarching objective and this should be made clearer and continue to be maintained. We agree with the objective 1 but needs to have greater hierarchy and leadership if it is to continue to put patient and public safety (objective 1) as its "primary objective".

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

No change.

Relaxing restrictions would not provide any benefits to the public/patients. We already have good choices and variations of optical practices to meet all type of needs for the public.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

No change. We should like to see the existing restriction maintained.

No benefit from changing it. We have large choice of expertise and skills within the existing UK optical sector.

The current system protects patient and public safety

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

None.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

We do not feel it would provide any greater benefit and there is a possible risk of mixed interpretation of registrants' core competencies. The proposal would or could have impact on service commissioning and delivery. If new post registration qualifications were to be incorporated, it may require more time and costly to the GOC to monitor and legislate.

Registrants' refreshes and increases their skills via new GOC CPD, training are given via extended eyecare services commissioning. This provided by Cardiff University's School of Optometry and Vision Science's Wales Optometry Postgraduate Education Centre (WOPEC), as supported by LOCSU: (Websites: WOPEC Extended Primary Eye Care Services Training (locs.co.uk) and Wales Optometry Postgraduate Education Centre // WOPEC).

Enhanced services and training provided are the best way of meeting the national objectives. The registrants are constantly upskilling and updating their existing core competencies via training programmes.

Enhanced Services that exist across England where the primary eyecare workforce delivers care within their core competence include (Webpage: LOCSU helps LOCs develop Services Directory Clinical Pathways):

Examples of Services are:

- Minor Eye Conditions Service (MECS)
- Healthy Living Optical Practice Framework
- Low Vision
- Maculopathy Referral Filtering and Monitoring
- Medical Retina Monitoring (Hydroxychloroquine) .
- CUES
- People with Learning Difficulties.
- Integrated Cataract (pre- and post-operative)
- Glaucoma Referral Filtering and Monitoring/enhanced case findings (ECF)

We believe these existing skills and accreditation has provided better relationship with our eye professional in the secondary care and will help in establishing National Eyecare Recovery and Transformation programme. (Webpage: National Eye Care Recovery and Transformation Programme - LOCSU and NHS England » Elective Care Transformation Programme).

NHS England has acknowledged registrants' skill and value it. It has taken advantage of the full range of clinical expertise and infrastructure primary eye care has to offer, recognising it as the equivalent of general practice.

Hence NHS England has developed an Optometry First (OF) which means they value skillsets of all participating optometrists. DO's and practice teams.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Not Answered

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Not Answered

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

We do not see any benefit. Run the risk of the public misunderstanding and inevitable risk of sight loss.

Also see response from our optical bodies on this issue:

- LOCSU support service for Local Optical Committee (LOCs) in England
- Association of British Dispensing Opticians (ABDO)
- Association of Optometrists (AOP)
- Federation of Ophthalmic and Dispensing Opticians: The Association for Eye Care Providers (FODO).

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

See response from our optical bodies on this issue:

- LOCSU support service for Local Optical Committee (LOCs) in England
- Association of British Dispensing Opticians (ABDO)
- Association of Optometrists (AOP)
- Federation of Ophthalmic and Dispensing Opticians: The Association for Eye Care Providers (FODO).

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

We question possible risk patients and public safety on this issue. We cannot see how this would be beneficial to the public.

Please see also further responses made by LOCSU on this matter.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This should not change for the interests of the public and patient safety.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

Please see data shared by

- LOCSU support service for Local Optical Committee (LOCs) in England
- Association of British Dispensing Opticians (ABDO)
- Association of Optometrists (AOP)
- Federation of Ophthalmic and Dispensing Opticians: The Association for Eye Care Providers (FODO).

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Yes, we refute this proposal.

The sight test should remain as defined by the present Act. It should not be separated as it runs a risk of missing eye diseases, sight loss and delayed

treatments of certain eye diseases, which in turn be costly to treat in its advanced stages. As mentioned in the Optician Act, sections 24 and 26, it clearly states that the importance of the sight test is as the early identifier of ocular issues including the mechanism for referral that, if left untreated or undetected, may result in avoidable sight loss. Especially the silent eye disease such as:

Glaucoma, Cataracts, AMD, and diabetic related eye diseases.

Separating the refraction from eye examination, could cause greater harm than good. Patients/Public could be confused and not appreciate the difference in refraction and eye health.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Maintaining present legislation is important. Professional and qualified optician with additional qualifications should have responsibility to safely fit and prescribe contact lenses.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is in the best interests for the patients that the present legislation remain. There would be risk of contact lenses sight loss, severe infections if patients are not correctly fitted and correct advice given to wear and handle lenses.

We feel that Optometrists and Contact lens practitioners take great care and effort and learning all the time to make sure knowledge is upto date and changes in the legislation do nothing to help value their efforts or protect our registered professionals.

Surveys by GOC itself and The British Contact Lens Association found approximately "three quarters of " contact lens wearers responded that they have experienced at some point problem in relation to wearing their contact lenses.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

We can not see any requirement of further restrictions.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Legislation should remain as it is, to ensure that there is an input from qualified professional to the supply change for patients seeking within specification from UK -based third-party suppliers.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

As discussed above in Q21/Q22/Q25.

Optical profession should uphold the standards when it come to sale and supply of contact lenses.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

We wish that GOC could do more or at least contact the seller and local enforcement bodies where sales are not in accordance with UK optical regulations

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Zero power contact lens wearers run the same risk of sight loss and contact lens related eye problems. These type of patients should be protected and further awareness of zero power lenses and it's risks is important.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

We cannot see any advantages for public and patients' safety regarding existing zero powered contact lens by changing existing legislation. If the legislation were to be relaxed it will cause an increase eye infection and other eye injuries to the cornea, this in turn could further burden on eye hospitals and secondary care.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Existing legislation is suitable and important for mitigating risks of plano contact lens use by inexperienced wearers .

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no change.

Risk of eye complications to the publics if there is any changes in the existing legislation.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

n/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

GOC need provide clear meaning of what is mean by technology development.

Remote care was very useful tool, especially during the COVID 19 pandemic along with introduction of CUES (Covid-19 Urgent Eyecare Service). It helped deliver care to patients with urgent eyecare needs. Reducing and over burdening the secondary care.

Despite the benefit of remote consultation it is important any legislation created in this area has to be flexible, as technology changes very quickly.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The use of technology and AI (artificial intelligence) will be increasing use in the future and so as the technology develops it is important that registered optometrists and dispensing opticians must remain in control of clinical decision making.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

We feel The GOC should adapt its policies to ensure that its patient and public safety objective incorporates any potential risks of remote care or technology.

We do have Data privacy is the key and one reason why robust guidelines have been developed to ensure the most appropriate approach to studies involving AI.

However the Act may need to consider how to protect the public and registrant from non regulated individuals or businesses that are not abiding the GOC's objective of maintaining patient and public safety.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

See responses from other optical bodies:

-LOCSU Support services for Local Optical Committees (LOCs) in England | LOCSU)-Association of British Dispensing Opticians (ABDO)

- Association of Optometrists (AOP)

- Federation of Ophthalmic and Dispensing Opticians: The Association for Eye Care Providers (FODO)

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

n/a

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Risk of cost incurring to registrants and Optical Community.

See Also responded from

LOCSU (Support services for Local Optical Committees (LOCs) in England | LOCSU).

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction, health assessment, contact lens fitting.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction, health assessment, contact lens fitting.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Nothing further.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction is not simply finding the correct prescription. It involves being able to detect a pathologically-driven change.

E.g. a patient experiences a hyperopic shift in one eye only, within 6 months. This is unusual, and would suggest that there may be fluid at the macula. Further investigation is therefore warranted, ie. Amsler, OCT etc.

A dispensing optician is not trained to recognise and perform the above, and therefore, not safe for the patient.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It would be insane, reckless and dangerous. See example scenario outlined in question 15.

Furthermore, it would diminish the profession of optometrist, if such an key part of what we do is delegated to unqualified personnel.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Ensuring patient safety.

Reducing likelihood of a patient suing a practice for not detecting a pathology should a DO be performing refraction where there is a significant pathological-driven change.

Protecting the reputation of the optometric profession.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

In my own professional experience, approximately 5%.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

In my own personal experience, it would be insane to separate refraction from eye health check, for reasons outlined above.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Ensuring optimal patient care.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction

Eye health checks

Supply of optical appliances to under 16s, SSI and SI

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sight testing

Eye health checks

Supply of appliances to under 16s, SSI and SI patients

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Probidion of mecs/eos/Glaucoma screening

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

In the interests of public safety toe GOCshould be involved in all post-grad qualifications eg. Professional Certificate in glaucoma to ensure consistent quality of course

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Refraction should not be separated from the eye health checks. In my 20+ years as an optometrist I have discovered many asymptomatic pathologies, eg strokes, brain tumours especially of the pituitary, and of course glaucoma and ocular pathology. These will not be detected by refraction alone. The expertise of optometrists in detecting pathology is second to none and extremely cost effective

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Pathology will be missed

Eye health checks will become optional resulting in loss of sight and a greater burden on public financed

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The current situation provides excellent value for money for the nhs.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The current legislation protects the public and is safe

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Some vulnerable sections such as mental impairment, Down's syndrome

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Optometrists are cost effective and perfectly suited for this role

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The public will not be protected. Msny will simply buy online without having checks which often leads to misuse of contact lenses and loss of sight, ultimately affecting public finances.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Regular corneal health checks and lens fit checks

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Erosion of care. Focus will be on retail outcome only rather than protection of eyesight. Pathology will be missed.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Optometrist provide cost effective and holistic care, frequently detecting ocular and systemic pathology on a very regular basis

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Pathology may be missed

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

testing of sight (section 24), fitting of contact lenses (section 25), and the sale and supply of optical appliances (with specific exemptions) and zero powered contact lenses

7 What activities do you think must be restricted to our registrants?

Please provide details.:

testing of sight, fitting of contact lenses , and the sale and supply of optical appliances (with specific exemptions) and zero powered contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Regulation to restrict sale and supply of contact lenses should continue, with a need to confirm and match the particulars of a contact lens specification.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

The industry is changing and likely to encompass a wider range of service providers over the coming years including virtual appointment providers. It is important that all of these functions remain regulated.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Extending business regulation to those carrying out restricted functions would force UK based internet pure players to register and uphold GOC standards. This would enable better protection of the public through provision of aftercare and ensuring specifications are at least checked. This will introduce additional barriers to online purchase for patients but ultimately better protect them.

Consideration should be given to the fact that online sellers could move abroad to prevent having to register.

It might be beneficial for patients if the check-up was no longer deemed a fit or re-fit when the existing lenses are simply being confirmed. This would allow for the remote issuing of specifications for asymptomatic established wearers as and when technology is able to support an anterior eye examination. Currently, insights suggest that patients tend to shop online to avoid repeat visits to their optician which could increase the risk of harm if the GOC are not able to regulate non-UK sellers.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

The refractive state of the eye provides evidence of ocular pathology for the optometrist. By decoupling refraction from eye health, we are potentially putting patients at risk for example in the case of macular oedema.

Also, opens the door to more complex litigation where an optometrist has missed pathology due to unreliable refraction and there would need to be very clear lines of accountability drawn.

Training for DOs is currently insufficient to allow this and the impact to educational institutes should be considered, including the path for existing DOs to become competent in refraction.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality,

diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

It would be likely that some DOs receive better training in practice for those who wish to adopt this model. There would need to be a clear path to competence established before DOs were allowed to refract. Some smaller practices who do not utilise a DO would be unfairly financially impacted as larger chains would be able to charge a lower fee for a refraction only with a DO.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The current framework allows for easy access to sight testing by a registered optometrist either through NHS funding and through offers run by businesses.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

"Fitting must begin before the re-examination date specified in a valid prescription (dated less than two years ago)." This can be impractical in real terms. There can be occasions when the CL fitting/check-up could reasonably occur prior to the sight test. Sight testing must be carried out, however, allowing flexibility here would mean patient's and clinician time can be managed appropriately to provide swiftest care.

CL check-ups for established asymptomatic patients should arguably not be considered fits or re-fits. It would be useful for the future of any legislation or subsequent regulation to account for this fact since technology is likely to allow comprehensive anterior eye examinations in the future. Currently regulation means that patients must visit practice to have their specification verified and re-issued which can be a barrier for some and drive them toward online purchasing.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

CL check-ups for established asymptomatic patients should arguably not be considered fits or re-fits. It would be useful for the future of any legislation or subsequent regulation to account for this fact since technology is likely to allow comprehensive anterior eye examinations in the future. Currently regulation means that patients must visit practice to have their specification verified and re-issued which can be a barrier for some and drive them toward online purchasing.

Practices adopted remote "aftercares" during the pandemic to extend CL specifications and as yet there have been no FTP or legal cases that I'm aware of.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Vulnerable adults such as those with learning difficulties. Patients with physical and mental health challenges who are considered vulnerable by their local HA. I believe this can happen under supervision with registrant sign off and clear record keeping.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This would ensure that where a financial transaction is taking place, it is under the supervision of a registrant who can intervene. For practices, this could introduce additional time demands and so it would be prudent to allow this to happen under supervision with registrant sign off and clear record keeping.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Agree with below:

46. We have heard from stakeholders that electronic copies should now be accepted without the need for verification, provided that they can be clearly read. We think the requirement for verification of both electronic copies and particulars is outdated and we understand the risks associated originally with this may have changed. During the COVID-19 pandemic we relaxed enforcement of this requirement, with no detrimental effects to our knowledge. 47. In addition, section 27(3B) of the Act requires the seller to make arrangements for the user to receive reasonable 'aftercare' in so far as, and for as long as, may be reasonable in that individual's case. There is no definition of aftercare in the Act and we have heard from stakeholders that it would be helpful for this to be provided.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Whilst I agree with below:

46. We have heard from stakeholders that electronic copies should now be accepted without the need for verification, provided that they can be clearly read. We think the requirement for verification of both electronic copies and particulars is outdated and we understand the risks associated originally with this may have changed. During the COVID-19 pandemic we relaxed enforcement of this requirement, with no detrimental effects to our knowledge.

There should be a need to match the original particulars of a specification and all ambiguity removed which can lead to unsafe substitution. This should however, allow for safe substitution under the direct supervision of an optometrist, CL Optician or registered medical practitioner when safe and in the patients best interests.

There should be regulation and checking of online seller compliance to the general direction and supervision application.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

I agree that it is unnecessary to check the particulars with the original prescriber if an original or signed copy is available. However, there is ambiguity over whether those particulars should be matched exactly. There should be clarity in the legislation and the associated regulation which clarifies that the particulars of that specification should be adhered to prevent unsafe substitution.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages include reducing the burden of time on practice teams and removing barriers to purchase optical appliances for patients.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Practices use the term aftercare to refer to what professional associations commonly call a check or fit/re-fit. It is important that the GOC defines the differences between both of these otherwise there is the potential that practitioners will be caught out. This was highlighted by the GOC Covid-19 statements which called out the perceived differences from a GOC perspective.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Buyers of zero powered contact lenses are less likely to have accessed proper fitting by a registrant and therefore less likely to be aware of safe CL care and hygiene. It is imperative that the GOC continues to protect all of the public and not just those who are seen by a registrant.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Legislation should make clear that the fitting and sale/supply of zero powered contact lenses is restricted to those with a protected title ie. GOC registrants. There should be a clear route to sanction illegal practice for any sellers who do not comply.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unsure

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Currently, re-issue of a specification to an asymptomatic established wearer must be done in a face to face setting. It is likely that technology will make it possible to check the health of the anterior eye remotely in the future but since this is considered a fit, if the legislation does not change, to use such technology would be considered unlawfully fitting. It would be useful to consider this to make the legislation fit for the future.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Insights suggest that one of the factors influencing online contact lens purchase (potentially from non-regulated sellers) is the avoidance of opticians appointments. By allowing easier access to clinical care remotely, practices would be able to free up chair time and provide care and advice to more patients.

Patients are also less likely to end up with a substitute lens from online sellers and evidence suggests that substitution can no longer be considered safe.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Of course, there is a financial cost associated with spectacle purchase, however, the regulatory requirement to have an in-date prescription provides a safety net for patients who may not be aware of ocular changes and/or pathology. It is likely that pathology would go undetected for longer periods without this regulatory barrier.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages: patients must have a health check if they require spectacles and they haven't had one for two years or more. It allows practices to insist on a health check before dispensing and allows the optometrist the opportunity to provide advice and recommendations that might be more suitable to the patient's current lifestyle.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unsure

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unsure

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Under sale or supply of CLs the seller must either under direct supervision or general direction obtain an original spec or a copy. There is no clarity as to whether the product sold has to conform to this specification. Guidance suggests it should but there is no legislative directive. This is important since we know CL substitution happens online rendering the need for a specification pointless. There are types of safe substitution which need to be considered here and built into legislation. Examples of safe substitution might be when a contact lens has been discontinued and a supplier provides "fit match" data to support a switch or when a patient is going on holiday and needs an urgent supply of contact lenses.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

See above

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

As per previous comments. Currently the need for an asymptomatic established contact lens wearer to be re-fit periodically means that remote care cannot be employed to undertake this important part of the journey. There is a risk that patients will simply purchase online which could lead to unsafe substitution and reduced likelihood to access registrant advice and care when needed.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The inability to regulate non-UK online sellers is the greatest risk to patients. Inevitably, a non-regulated seller is less likely to adhere to GOC standards which are in place to protect the public.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

All online sellers to UK consumers should be registered bodies corporate and should fall under the jurisdiction of the GOC.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Covid-19 statement on aftercare. Clarity on what aftercare is.

Covid-19 statement on CL sale or supply-why can remote technology not be used to complete this for established, compliant and asymptomatic patients who need a re-issue only?

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

Business owner also

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

As current, non registrants should not be able to test sight or carry out health checks. If they are delegated pre screening tasks only under the supervision of an Optometrist then I agree that is fine - pre screening only though so fields, OCT, fundus imaging etc but only to help the Optom.

Dispensing and fitting of optical appliances to under 16 or those who we classify as vulnerable or partially sighted/low vision.

Non registrants should also not be allowed to sell contact lenses/zero powered contact lenses by any method.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Testing of sight - refraction

Eye health checks

Dispensing/fitting and collection of glasses to under 16, vulnerable, partially sighted

contact lens fitting and aftercare

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I dont really see the point. As an Optomertrist, I have in previous roles been a re reg supervisor. Just cos a task will be delegated/removed, as an Optom I would feel responsibility for the refraction. A sight test is a battery of tests so I feel the Optom should be in charge of the refraction but all other tests such as fields could be delegated. I also think there will be less inclination to have a health check.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It is already confusing for the patient as many look online. Depending on the site, some ask for rx copies and some don't. Then when you need to explain this all to a patient, it wastes our time and opens up chances for mistakes to happen. Contact lenses sit on the eye so as far as I am concerned, fitting and aftercare are important. What is the point of 4 years of studying if this is the way things are going

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Disabled, or those unable to communicate easily. Only a registrant should be able to dispense/fit appliances so that even those who may not be able to express an opinion get the same treatment

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I don't think there is anything wrong with restricting items. It will safeguard such patients and also bring some respect back to the profession. The general public don't always understand such things.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

The worst is online sales by non-registrant companies. They can easily find loopholes to supply without checking rx. Also, contact lens suppliers who supply these companies are helping to drive the cost down even more and this has a real impact on small businesses.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Pxs already dont understand a lot of these regulations. With immigration and therefore people looking to buy contact lenses, many do not know we cannot supply without valid contact lens rx and sight rx. In my opinion, a contact lens sits on the eye directly and therefore interacts with the corneal and tear layer - therefore regular checks should be carried out. Regardless of powered or non powered. To top this off, large multiples do not charge appropriate fees so this drives down those fees and then buying online is cheaper.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

If a customer wishes to buy elsewhere or online, then they should have a rx

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It depends on how we want to look at contact lenses - if we agree they are a medical device, then of course verification is important. What is the point of then having a fitting done or even an aftercare. Contact lenses to be honest are a loss leader so unless we charge appropriately for or chair time things wont change anyway.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

I think there should be a minimum list of things that need to be checked - this will also help the px understand the importance.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

They are still contact lenses whether powered or not or coloured or clear I fail to see the difference.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

As above

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

one of the issues of removing barriers is anyone will then be able to sell them be it online or in a shop. and perhaps any type of shop. i personally believe any device that corrects sight should be sold under the supervision of a registrant.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

at least this ensures people have an eye test including health check. this can pick up early health conditions. why would we even want to increase the burden on secondary eye care

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no advantages. only time this is possible is if the px cannot come in or there is a safeguarding issue etc. what is the point of even going to study Optometry/dispensing if things will be deregulated in this manner

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

what is the difference between sports and non sports eyewear. imagine a px who has very high cyles, if the job is not checked to ensure they are made within tolerance, could this cause distorted vision? this may or may not have an impact on performance but then again it may. if they are worn for any period of time, they could cause asthenopic symptoms. again, what is the point of this? i agree it is nice to make things easier for the end consumer, but this should not be at the expense of over simplifying things just for the sake of it.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

there is a sudden upsurge in "blue light" glasses. where is the evidence that plano blue light glasses help with symptoms? these pxs should be encouraged to have their eyes tested as they may be hyperopic or astigmatic which may be contributing to their symptoms. i have come across a few parents who have just bought their children plano blue light glasses off the internet because of overuse of digital screens. why are these children and their parents aware of the importance of regular eye tests. again why aren't those in their early 20's and 30's aware of the importance

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

not sure where to put this but I do not agree with simple auto refraction to replace proper refraction. i do understand the impact on the secondary eye care system in the hospitals but there are better ways this can be helped. it seems as though the large multiples get all the hospital contracts. most of these multiples are already busy so they will be the driving forces behind separating refraction and eye health checks. many many independent practices will not be as busy as they run slower paced clinics to provide more detailed eye care as many will prefer to allocate more time for tests. it should be made easier to outsource care to independents or other practices.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

why should items be sold online if not properly regulated.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Prescribing spectacles and contact lenses
Making decisions regarding the health of patient's eyes
Dispensing for patients with additional needs, low vision or children.

Carrying out pre-screening tests without training and supervision.
Dispensing without a qualified eye care professional on the premises (not remotely!)

7 What activities do you think must be restricted to our registrants?

Please provide details.:

As above

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dispensing patients with additional needs - learning disabled patients in particular should be protected by this.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

There should be some way of preventing people claiming to be 'experts' such as behaviour optometry, sports vision etc without qualifications to back this up. It is confusing for the general public.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

I think that the business regulation is confusing - surely all practices should be regulated - or none (preferably all!)

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

All businesses should be regulated to create a truly level playing field and to ensure the safety of patients.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

This would certainly help but if that isn't possible maybe the whole thing should be handed to the CQC to cover instead.

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

possible CQC - this wouldn't work currently because the forms to fill in do not 'fit' optometry practices but if they were accrediting I am sure this could be changed.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

This is a huge risk to the patient - the only benefit is to big businesses who can employ more cheaply and see more patients.

Patients come to the opticians mostly for new specs and often do not understand the importance of the eye health check. If the refraction is done by a DO the eye health can be bypassed and this puts the patient at risk.

I use ret to pick up indications of keratoconus and media opacities as well as getting an indication of latent hypermetropia and binocular vision concerns. Separating refraction and eye health means that these subtle indicators of change or disease may well be missed due to communication between professionals at handover.

How will it be funded by the NHS ??

How will it help if patients have to see and optom too this doesnt free up consulting room space.

There is no shortage of optoms so what is the 'problem' we are solving.

Optoms have spent a lot of money on their training to do a job that then doesnt actually exist in the format that they signed up for.

Many optoms enjoy this aspect of their work and are not interested in extended roles.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

see above

The main impact is increased profits for the multiple sector, reduced safety for the patients.

This will be even more significant for children and people with learning disabilities and people with early stage eye or systemic disease.

Refraction is not just about spectacles it is an integral part of the eye examination.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The structure of the eye examination as set out by NHS contract puts up barriers to monitoring eye conditions. This results in false positive referrals because repeat measures are not funded.

Because you cannot do part eye examinations for people with learning disabilities it means that these patients often find the eye examination very challenging or just dont attend. There should be a way of claiming for several shorter appointments for patients with learning disabilities so they can have acclimatisation visits or additional checks. It is not fit for purpose for this group of people who are high risk of sight loss but do not bring profits into the practice - this means they are not encouraged and not provided for.

There should be a way of funding the tests that the patient needs within the remit of standards of practice rather than ticking all the boxes and referring if the person is borderline for IOP or fields etc. If the ECP justifies the tests that they have done and claims for the patient episode in the same way that doctors do then there would be less referrals into the hospital and reduced false positives.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As above

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The only issues are with online sales which are outside of the UK and cannot be regulated unfortunately.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Currently patients are protected by the system and would be at risk if unqualified fitting was allowed to happen.

The plano and party lenses available in fancy dress shops are evidence that this is a huge risk to the public.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Restrictions to qualified DOs and optoms only should be for the sale of spectacles and contact lenses to people with learning disabilities, children, people who are visually impaired and those with complex prescriptions.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This protects the most vulnerable in society and those with complex prescriptions or physical disabilities. People who require an expert to ensure they get the most appropriate fit and lens design. Taking into consideration all additional needs and special requirements such as those using communicator boards etc.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

They are there to ensure patients get the correct lenses as prescribed by a professional I cant see that these are a barrier.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Unfortunately online this is already possible - we already see patients that have purchased 'recommended' lenses online - one patient came in with 5 different brands that they had tried out and asked me to prescribe their favourite!

We should not be encouraging this and therefore removing these requirements would send the wrong messages entirely and result in patients not understanding the need for care.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

whatever the power of a lens it is still in contact with the eye and carries the same risks

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

as above

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The consumer is already at risk due to the competition between practices and online sales. Further legislation reduction will result in patients being more at risk of poor quality dispensing and products.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The 2 year limit protects patients who often dont understand the issues around why they should have an eye examination. This is a safety net that should not be removed.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It protects patients by driving them towards eye examinations even when they dont understand the need for this. We will see an increase in late stage disease such as glaucoma if this safety net is removed.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Incorrect appliances can do a lot of harm to children's eyes and they need to be protected by properly qualified staff

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Children will be protected from incorrect fitting and dispensing. They will have professional advice and will not be at risk of poorly fitting specs and being sold inappropriate coatings etc.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

people with learning disabilities should have NHS eye tests as standard every year not every 2 years as a standalone category not due to low income. They should be a restricted category in terms of dispensing too.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

There is certainly more use of technology and this should be reflected in the act.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Imaging
use of dry eye treatments

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

there are gaps but given that this is outside of the UK in many cases I am not sure what you can do to address this.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

As mentioned previously people with learning disabilities are over looked in the current legislation at all stages.

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

all things eye test related. health check, refraction, slit lamp examinations to name just a few, these require adequate experience and understanding and ongoing training to maintain skills .

7 What activities do you think must be restricted to our registrants?

Please provide details.:

as above, all things eye and eye health related. if cpd is important to maintain skills, then why should any of the work be passed off to an unregistered person?

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

whilst this may be unpopular, i would also include all pre tests that are often carried out by staff members to be done by the optometrist, this ensures that results are checked accordingly and the test is carried out to the highest standard.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

i have no actual evidence. only an opinion that everything i do i want it to be the highest standard for the benefit of any patient who comes to see me.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

why aren't optical businesses already regulated/inspected by the GOC? I feel this is a good way to ensure clinical standards are constantly being met.

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

What are the reasons for wanting this anyway? I can only assume financial... carry out as many quick refractions as possible to increase till sales? Is that good for enhancing standards? I quite like performing a sight test and handing to a dispensing optician for a dispense, I know it will be done correctly. I know the patient is in very capable hands and will be happier with the final results. Can i ensure this if the refraction is carried by someone less experienced and then handed over to an even less experienced and less knowledgeable staff member? Does this mean the patient now doesn't have any health checks carried out? Will a refracting DO have to learn all the same binocular vision skills to ensure a balanced OMB outcome for the patient? And if not, does that deem a Binocular vision assessment pointless? It is a part of the GOC sight test, so why should it be left out? Will a refracting DO also have to pay extra GOC fees to cover as an optometrist does? And extra insurance fees as well? To take on the responsibility of any errors that can lead to potential cases?

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

There are little advantages to the patient. The advantage is for business profits. I hope this isn't a GOC incentive?

In 2013 the GOC released a statement to the optician magazine stating they would not separate elements of the sight test. That it was in the best interest of the public etc , is there any reason this statement has changed?

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Patients are happy that they know they receive a high standard of eye health care. We have many patients who come here from abroad precisely for this reason. If you lower standards, the perception of the outstanding GOC and all the performers provide has a risk of dropping.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The patients know exactly what is expected and if anything, my opinion is that they would almost prefer we had more in the way to offer in terms of optical wellbeing.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

we have a low rate of contact lens problems in this country. Why change something that works?

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

lowering standards is bad for the patient, and good for the till. this is not a good reason though.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

vulnerable groups could extend to people with lower mental capacity.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

it is only to ensure that a purchase made is within sensible financial ability for the patient and they are not being sold something from a sales pitch, rather than a clinical requirement.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

the sale of prescription contact lenses is already unregulated. I can buy anything online.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I have known someone who ordered online contact lenses from a sight test RX

R -1.00DS

L -1.00DS

they ordered

R -1.00 /-1.00 x 100

L -1.00 /-1.00 x 100

and they received it and couldn't see! funny that. no regulating and no verification required. Just trust that a non optical person who has no understanding of prescriptions knows what they are doing.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

why doesn't it already do so? A sight test has definitions. Is contact lens care less important?

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

my understanding was a contact lens is a medical device, therefore regulations should exist.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

i don't know the stats on this

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

all advantages are financial.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

No

Please give your reasons and provide any evidence to support these.:

The UK is world renowned for its high standards. This includes regulations- why are you calling these unnecessary barriers? Im not sure why there is a movement to lower standards?

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

why would you spend out on driving glasses, and then find the RX doesnt actually meet driving standard for example? a sight test negates this issue.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Ive had this in a multiple practice before where a non registered staff member, took an RX from someone of a photo of some numbers and was about to order glasses and thoroughly happy with themselves for making a sale. I intervened and advised that the copy taken was wholly inappropriate and very inaccurate. We advised the patient a test would be better, which he reluctantly agreed upon and then we found a whole different Rx and a hemorrhage . A non registrant missed this- understandably, but reducing standards only risks this happening more often. There needs to be shift in the perception of eyehealth and eye care, the onus cannot be purely about profits.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

as above

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

you can go online and buy whatever you like for a child. ive known a mum purchase a +4.00... for a child who was +2.00/-2.00 RX ... She added the numbers up (incorrectly at that). and wondered why her child couldn't see. the website couldnt be held accountable. which i guess is not their fault, its the mums for being cheap.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

surely theres an obvious reason as to why providing correct sight sports goggles and swim goggles is beneficial. It means seeing and therefore playing said sport better!

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

as above

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

magnifiers etc should be readily available to all those who need them.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

I have no knowledge of how a remote sight test is carried out and can meet GOC standards. This seems very unlikely to me, if there is a safe and effective way of doing so, then it can have its uses in the real world for sure.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

as i said before, there is no real regulation of online sales.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

enhance what is done in practice, build more trust for patients to not feel they need to go online.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think sight testing times need to have a minimum time as issued by a GOC order. I think its daft that some multiples offer 15 minute test times with an optometrist. Every possible corner will be cut to follow this through , it is the most unrealistic time offered for a full and safe sight test.

I would also regulate pre-reg supervisors. It seems that there is no regulations of this. A supervisor can take on a pre-reg and not ever be present and pass the supervising buck onto a plethora of locums and DO's and CLO's. Sadly many pre-registration optometrists learn very little clinical skills like this, and when they do not pass their assessed competencies, the individual person is blamed and told they do not make enough sales (???) which is the reason for this failure, not the lack of consistent and thorough supervision.

If any one change comes from this consultation of questions, please can you regulate supervisors?

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

as above, Supervisors for pre-registration. They should only have 1 pre reg at a time. They should actively be supervising that pre reg for the minimum time required. The pre reg should not be forced to be cheap labour carrying out 20 minute tests within a few months to make more money. A pre reg should not be told they are a failure if they cannot do a proper handover or meet a conversion target. Locums and shop floor DO's should not be supervisor substitutes. And if they are they should be paid appropriately for it. and offered appropriate time for checking work, and advised atleast a few days before - not just on the day when they turn up. So this was they know who they responsible for. Please regulate supervisors better.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Examining of sight and the supply and fitting of spectacles

7 What activities do you think must be restricted to our registrants?

Please provide details.:

The supply and fitting of all spectacles

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Registrants should keep up with modern techniques and information by regular conferences and examinations.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes - under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

A Dispenser is quite capable of simple refraction this would free the Optometrist to carry out more advanced consultations.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We must ,as a profession move on.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The supply by the unqualified of contact lenses especially on line is a recipe for disaster.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

All fitting and supply of spectacles should be left to those who have taken the trouble to study and take examinations.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

To protect all Px from those who do not have the qualifications.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

It depends on The changes, regulation should be increased .

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The safety of the Px.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

If it is tightened no

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It does not protect the Px

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The idea of regulation surely is to protect our patients

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

What if the Px had a recent serious condition that would go unnoticed.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not tight enough

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Considering the high impact nature of some sports the area should be tightly controlled.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The possibility of serious injury with incorrect fitting

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not tight enough

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

Consider bringing the supply of all optical appliances back under tight control

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not tight enough

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Having been retired for a considerable time I am not in a position of being able to answer this

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

testing sight

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear

selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

In addition, the GOC should take account of developments in practice that have occurred since the legislation was last reviewed and prevent non-registrants from carrying out the following activities either directly or under supervision:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:

highly-developed communication skills,

expert dispensing skills, taking into account factors such as facial characteristics and posture

an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour

an ability to judge the decision-making capacity of a patient

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

is long-term and potentially expensive

has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia

may be of value to patients who are over 16, as well as to children.

Recognising that legislative change could take some time, the GOC should review its standards of practice and standards for registered businesses to make clear what constitutes good practice for the benefit of patients.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

In order to protect the public, the following activities must be restricted to registrants:

testing sight
fitting contact lenses
selling optical appliances to children under 16, including sports eyewear
selling optical appliances to people registered as visually impaired
selling zero-powered contact lenses
dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia
giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The GOC should take account of developments in practice that have occurred since the legislation was last reviewed and restrict the following activities to GOC registrants only:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:
highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:
is long-term and potentially expensive
has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia
may be of value to patients who are over 16, as well as to children.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

Yes, there should be a consistent approach to business regulation, recognising that some activities are within the control of businesses as opposed to individual registrants, such as ensuring that:

there is the right balance between clinical and commercial incentives
there are appropriate standard operating procedures
equipment is maintained correctly and staff are properly trained to use it
All businesses carrying out restricted activities should be required to register with the GOC and comply with its business standards.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

No, when the GOC considered this question in 2013 it concluded that the risks associated with business practices did not warrant an inspection regime. Since then, the GOC has strengthened the system of business regulation by introducing more comprehensive business standards that make clearer its expectations.

In the absence of evidence that the risks associated with business practices have increased and analysis showing that it is necessary and proportionate to introduce an inspection regime, the case for doing so has not been made.

As a general rule, the GOC should think very carefully before increasing the costs of regulation and these will ultimately be passed on to patients.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

The GOC states in the call for evidence that, “dispensing opticians could undertake refraction for the purposes of the sight test if they are appropriately trained, competent, overseen and indemnified.” They go on to say that this would be possible only if they were to amend or remove its 2013 policy statement on refraction.

[redacted] supports the GOC’s view that dispensing opticians should be able to undertake refraction for the purposes of the sight test, subject to the stated conditions. Therefore, the GOC should amend its 2013 statement on sight-testing to enable this to happen.

We also recognise that refraction by dispensing opticians for the purposes of the sight test should be under the oversight of an optometrist or medical practitioner so that patients will continue to benefit from an eye health examination in conjunction with a refraction. This is a major strength of the UK’s system of eye care and enables eye and wider health issues to be identified and addressed at an early stage in line with the wider health policy focus on prevention.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Enabling dispensing opticians to refract as part of the sight test under the oversight of an optometrist or medical practitioner would be a limited change to the GOC’s 2013 statement on sight-testing. What is often overlooked is that this statement already allows dispensing opticians to refract outside of the sight test, e.g. to check a prescription.

The training needed to enable dispensing opticians to carry out refraction as part of the sight test would also be limited. They already learn about refraction as part of their initial education and [redacted] would provide additional training so members’ skills and knowledge are up-to-date. The GOC’s new outcomes for registration will ensure that future DOs are fully versed in refraction from the outset.

Enabling dispensing opticians to support optometrists and medical practitioners in carrying out sight tests would enable patient care to be provided in a more flexible way while upholding the principle that a sight test should involve both a refraction and an eye health examination.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Yes, the sale and supply of optical appliances to certain groups of vulnerable patients should be further restricted so that it must be carried out by a registrant. Such patient groups should include people with learning disabilities or dementia because dispensing optical appliances to such patients requires enhanced skills and knowledge.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing optical appliances to people with learning disabilities or dementia requires enhanced skills and knowledge, including:

highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
understanding of medical conditions

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

N/A

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No, the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 does not create any unnecessary regulatory barriers.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These restrictions are necessary to protect the public and should be maintained. We do not agree that the fitting process for such sportswear is 'not as complex' as for spectacles or contact lenses. Sports eyewear is fitted not only to ensure optimum vision but to afford protection to the wearer. Therefore, it is more rather than less complex to fit, requiring detailed questioning about usage and enhanced dispensing skills to ensure a safe, optimum fit.

The call for evidence also suggests that the restrictions might be unnecessary because sportswear is 'usually only worn for short periods'. While diving masks, swimming goggles or sport goggles can be worn for short periods, they can also be worn over an extended length of time. In any case, if such optical appliances have not been fitted correctly and/or appropriate advice has not been given, there is clearly an increased risk of harm if a child is unable to see clearly under water or is wearing a poorly fitting pair of rugby goggles. This could also result in harm to team members or competitors.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

N/A

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

- fitting spectacles on children under 16
- fitting contact lenses
- carrying out pre-screening without supervision
- Triaging patients
- selling contact lenses without prescriptions

7 What activities do you think must be restricted to our registrants?

Please provide details.:

- refraction
- ophthalmoscopy
- fitting contact lenses
- Triaging
- fitting spectacles on children under 16 or on vulnerable patients

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Supplying contact lenses or glasses especially as there is a large amount of people buying contact lenses online without every being taught how to insert or remove them and as a result are not aware of the associated risks of contact lens wear.

Also with the large amount of companies selling glasses online especially varifocals there is no one taking responsibility of what is being supplied which poses a danger to the public as suppose the varifocals are not correctly measured and the person buying them i driving in them but has a accident??

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

all businesses should be registered

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

I think this would be very difficult as refraction is closely linked to the health of the eyes especially in patients with underlying conditions. When refracting there are lots of factors that optometrists take into consideration especially when looking at the best corrected VA. I feel this would impact public safety as by delegating it, the optometrist may not get the 'bigger picture' when making a clinical decision. Also, when prescribing there are times based on history and symptoms and other factors where the prescription needs to be modified and without taking this into consideration when prescribing errors can be made which could impact public safety.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I feel that by allowing dispensing opticians to refract, this would bring the whole profession into disrepute. Optometrists spend minimum 4 years of training to be qualified and I feel by deregulating the refraction part the whole qualification would be lessened. Already, the public have no appreciation of the profession given the fact that optical devices are widely available online and this would further impact patients' opinion on the profession.

I feel that this deregulation is something that was proposed by the multiple companies to line their pockets and I feel that the GOC always sides with what they want be it right or wrong and do not take into the fact that smaller independent practices who pride themselves on clinical excellence would be financially impacted as the public will not appreciate the importance of sight testing especially the eye health check up.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I feel the current sight testing regulations work fine as it highlights the fact that refraction and health check ups are closely linked and I do not feel that this needs to be changed.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages are that it is more convenient for the patient to have everything done in one visit. It's also more beneficial for the optometrist as having one person doing both means that better clinical judgements can be made.

Having remote testing based on auto-refractor results seems detrimental as sometimes these can be inaccurate and do not take into consideration underlying healthy issues or Binocular vision problems. Therefore it is more advantageous to have patients seeing the optometrist for everything as all these factors will be taken into consideration.

I feel that the current legislation works just fine.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

I think it is area dependent as I have worked in many different areas in the UK and it is demographic related.

Certain areas I have seen at least 30-40% referrals and others very minimal.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The current system works fine as it ensures that patients are wearing the correct contact lenses for them and are aware of the associated risk of contact lens wear.

The only disadvantage is that when there is someone that is visiting from abroad, it is difficult to give them contact lenses in an emergency.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

people with special facial characteristics as these need to be fitted properly
people with cognitive problems as again these people can't tell you when their glasses are not comfortable, a qualified person should fit these so the glasses do not cause any problems.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The reasons are as stated above.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

yes in the situation where contact lenses need to be provided in an emergency for example person visiting from abroad.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

I feel with contact lenses widely available online, I have found a lot of patients getting hold of them without a prescription and are completely unaware of the associated risks and are not compliant with contact lens wear. Also, a lot of patients are ordering contact lenses without understanding their full spectacle prescription or the need to make sure they fit properly. Therefore I feel that the wear of contact lenses should be closely supervised.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

As I have stated above, I feel that contact lens prescriptions should be verified by the supplier for patient safety.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages would mean that contact lenses could be issued in an emergency,

Disadvantages would be that there would be no way of checking if the patient has had the contact lenses examined in their eye and is aware of contact lens dos and don'ts

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Check to make sure that the current contact lenses are still suitable for the patient and should include the fitting of the contact lenses, corneal check, vision and patient compliance.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I feel that zero powered contact lenses pose the same risks as prescription contact lenses and therefore should undergo the same legislation.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

There will be less patient compliance as these will be readily available. Cosmetic contact lenses still pose the same risks as prescription contact lenses therefore there is a need to make sure that they are being used properly.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

As it will make sure that these are not widely available without being fitted and suitability checked.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financially it would be better for opticians as a lot of people ask for these especially during times like halloween. I would fear that people would not treat these properly as they would not be viewed as a medical device.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I feel the legislation needs to be in place.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Risk of people not getting the health of their eyes checked as they can 'see fine.'

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

I feel it is necessary as it highlights the importance of regular sight testing which I feel often gets forgotten especially if the prescription is stable.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages would be that the health check can be forgotten if the person is happy with the prescription

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages would be that people will appreciate the importance of regular sight testing and therefore pathology would be picked up earlier reducing the strain on the healthcare system. I cannot count how many times I have picked up sight threatening conditions in routine sight test where the patient was asymptomatic. Often early pathology can be dealt with quickly and efficiently without the need for extensive risky treatment which can be often the case if things are left.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

These need to be in place as checks need to be done to make the sportswear is appropriate and meets the correct criteria to prevent any injury to the child.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

disadvantages would be that the wrong product could be supplied and this would cause harm to the child.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It puts the interest of the child first.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The only disadvantage is that optical appliance are available online, whilst this may be cheaper for the patient, there are no checks to see if the appliance is made, positioned or fits properly, which can cause unduly harm to the public especially if the person is driving with the wrong setting. I feel the current legislation should be tighter especially with online sales.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I feel doing remote testing where prescriptions are prescribed using auto refractors can be highly unreliable. It does not take into consideration things like underlying health conditions or binocular vision problems.

Also what about remote health checks, how can all the surfaces of the eyes be examined properly without the use of a slit lamp? what about a sodium fluorescein check? Surley this goes against the GOC requirements to check the health of the eyes?

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

see above

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

I feel that online sales are not properly regulated and these regulations should be made tighter.

I give an example of what happened recently in practice:

first time glasses wearer wants to wear contact lenses, not glasses. refuses to buy glasses but instead buys contact lenses online using his glasses prescription. The online company supplies daily contact lenses to the patient without any checks to see if they have been fitted. Patient does not know how to insert or remove them even after watching endless you tube videos. But of course he has been prodding and poking at his eyes for 2 hours without thinking that my eyes are sore and I should stop. Develops an infection and then attends practice. Has an infiltrate and has to be sent to A&E. This situation could be avoided by making sure that the appropriate care and information was given to the patient before he started on his contact lens journey. This put an avoidable strain on the health system costing the tax payers more money.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

All companies supplying optical appliances should be registered and regulated to make sure they are following the guidelines. This should be law and the companies that are non compliant should shut down.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

As previously stated, online sales should be more closely regulated.

Also from a business prospective, businesses should be allowed to take a monetary deposit at the the time of booking an appointment like it is widely done in dentistry as why should businesses lose out when patients book and do not turn up for their appointments. Why should we not be able to take a deposit in order to protect our businesses.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The part where it says that the patient is not allowed to pay before the appointment. We should be able to take a deposit for bookings in order to protect our business as why should we have to lose out if patients do not turn up for their appointments. Other healthcare businesses are allowed to charge, why not opticians? We should all stand up for our profession.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Member of the public

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Although dispensing opticians are capable of performing the sight test, I* believe that you cannot separate out the refraction from the eye health aspect – and therefore the proposal could be detrimental for patient care and experience.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

I support a competency based approach to assessing which clinician or health professional should perform a specific task. I see the case for amending the Act to enable dispensing opticians to undertake refraction for purposes of the sight test, under oversight of an optometrist or registered medical practitioner. We need to support optometrists to deliver more fully to ophthalmic care pathways, so lower risk activities should be delegated, where clinically possible, to free up capacity.

It is crucial that optometrists and dispensing opticians work together to develop the right pathways and models – enabling cases to be escalated to optometrists where needed.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

Unsure if the GOC has the capacity or the 'teeth' to inspect?

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

I can see the case for amending the Act to enable dispensing opticians to undertake refraction for purposes of the sight test, under oversight of an optometrist or registered medical practitioner.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There is a clear advantage of upskilling all optometric workers to increase their personal skills and to make optometric practices more efficient and improve services for all however there needs to be a competency based approach to assessing which clinician or health professional should perform a specific task to ensure the experience is not detrimental for service user/customer care and experience.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

The concern is that we will see multiples, registrants and new entries promoting a refraction check as a separate test to the general eye health check to save both time and money. This could lead to many eye conditions being missed early and dramatically increase the Ophthalmic burden and pathologies in years to come as people will attend clinics with advance glaucoma, Diabetic Retinopathy etc.

The eye check is the only example we really have of public health in optometry and the understandable profit motive in the industry would lead to a discarding of this and a 'simple eye test' (ie just refraction) being sold. This would further result in people being given the option of purchasing a 'full eye health examination' and particularly with the current cost of living crisis and people's general lack of understanding around their eyes this would be refused by most.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The fitting contact lenses should remain restricted to registered optometrist, dispensing optician or medical practitioner to ensure consistency of care and eye health.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The fitting contact lenses should remain restricted to registered optometrist, dispensing optician or medical practitioner to ensure consistency of care and eye health.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

The fitting contact lenses should remain restricted to registered optometrist, dispensing optician or medical practitioner to ensure consistency of care and eye health.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

The AOP (Association of Optometrists) report in 2021 that that unsafe contact lenses bought online, from unregulated suppliers, are putting the public's eye health at risk.

Some optometrists reported seeing as many as nine patients in a month who've experienced problems as a result of contact lenses they've purchased online

Ill effects of the illegal contact lenses can in extreme cases cause sight threatening conditions and permanent damage to the eye

Almost half (45%) of contact lens wearers are unaware that some online suppliers are unregulated and do not comply with UK safety regulations

Association of Optometrists is calling for tighter regulations around online supply and advise the public to be vigilant to ensure they are buying from a safe UK supplier

(<https://www.aop.org.uk/our-voice/media-centre/press-releases/2021/10/20/optometrists-warning-over-illegal-and-unsafe-contact-lenses-as-online-buying-soars>)

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Aftercare is a specific appointment concentrating on the vision with the contact lens and how it physically interacts with the eye. The appointment also looks in detail of the health of the front part of the eye in particular the conjunctiva, corneal and tear film.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Using unsuitable contact lenses, or using contact lenses incorrectly, can cause serious eye problems including corneal ulcers and infections. In extreme cases, sight loss or blindness can result.

Other risks associated with the use of these contact lenses include conjunctivitis, corneal swelling, allergic reactions, corneal abrasion and reduced vision. The law is there to protect customers' health.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Using unsuitable contact lenses, or using contact lenses incorrectly, can cause serious eye problems including corneal ulcers and infections. In extreme cases, sight loss or blindness can result.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

No

Please give your reasons and provide any evidence to support these.:

Maintain current law

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Compliance with current law and maintenance of consumer eye health

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Eyes change as we age, a prescription from several years ago may no longer guarantee clear vision. The service user/customer may not realize how much their vision has deteriorated/changed since their last eye examination. Also the eye test picks up on more than just refractive change including eye health in general and some indicators for bodily conditions (such as high blood pressure) so a regular eye examination is about more than refractive change.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

General eye health and the correct prescription for the service user/customer

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Technological issues

As in other medical fields, technological breakdowns and glitches are usually the most common barrier to telehealth in vision care. And unfortunately, no technology is completely problem-free. When patients/customers schedule their virtual visits with an optometrist, it can be frustrating to find out that their remote exam can't be conducted due to a network error, connection issue or other technological snag.

Continuity of care

With telehealth in vision care, patients/customers are sometimes seen on a first-come, first-served basis, which can negatively impact the traditional patient/customer-optometrist relationship. The long-term relationship between patient/customer and optometrists gives practitioners the opportunity to develop a better sense of a patient's/customer's overall lifestyle and take into consideration other factors that may help create more individualized diagnoses and treatment plans.

Accessibility and deprivation

With changes in technology, we must be cognisant of the variations within society and the need for equity and accessibility. There is a concern that we could deny eye care to a large proportion of already disadvantaged people if we rely on technology which is either out of the reach of people or inaccessible to them for a large variety of reasons.

Regulatory concerns

In this rapidly-evolving landscape, eye care providers (that have or are setting up telehealth programs) need to stay on top of changing standards of care and regularly review current regulations to remain compliant.

For both patients/customers and eye care practitioners, telehealth in vision care offers a lot of opportunities to improve and extend care services. However, at this time, it does have certain limitations that could affect an eye care provider's practice and the relationships they hold with their patients.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Due to the prevalence of eye conditions in people with Learning Disabilities and those with Dementia the eye examinations should be free for people with these conditions and the recommendation should be for annual sight tests.

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

testing sight
fitting contact lenses
selling optical appliances to children under 16, including sports eyewear
selling optical appliances to people registered as visually impaired
selling zero-powered contact lenses

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:
highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:
is long-term and potentially expensive
has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia
may be of value to patients who are over 16, as well as to children.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

testing sight
fitting contact lenses
selling optical appliances to children under 16, including sports eyewear
selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:

highly-developed communication skills,

expert dispensing skills, taking into account factors such as facial characteristics and posture

an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour

an ability to judge the decision-making capacity of a patient

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

is long-term and potentially expensive

has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia

may be of value to patients who are over 16, as well as to children.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

No, when the GOC considered this question in 2013 it concluded that the risks associated with business practices did not warrant an inspection regime. Since then, the GOC has strengthened the system of business regulation by introducing more comprehensive business standards that make clearer its expectations.

In the absence of evidence that the risks associated with business practices have increased and analysis showing that it is necessary and proportionate to introduce an inspection regime, the case for doing so has not been made.

As a general rule, the GOC should think very carefully before increasing the costs of regulation and these will ultimately be passed on to patients.

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Yes, the sale and supply of optical appliances to certain groups of vulnerable patients should be further restricted so that it must be carried out by a registrant. Such patient groups should include people with learning disabilities or dementia because dispensing optical appliances to such patients requires enhanced skills and knowledge.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing optical appliances to people with learning disabilities or dementia requires enhanced skills and knowledge, including:
highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
understanding of medical conditions

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These restrictions are necessary to protect the public and should be maintained. We do not agree that the fitting process for such sportswear is 'not as complex' as for spectacles or contact lenses. Sports eyewear is fitted not only to ensure optimum vision but to afford protection to the wearer. Therefore, it is more rather than less complex to fit, requiring detailed questioning about usage and enhanced dispensing skills to ensure a safe, optimum fit. The call for evidence also suggests that the restrictions might be unnecessary because sportswear is 'usually only worn for short periods'. While diving masks, swimming goggles or sport goggles can be worn for short periods, they can also be worn over an extended length of time. In any case, if such optical appliances have not been fitted correctly and/or appropriate advice has not been given, there is clearly an increased risk of harm if a child is unable to see clearly under water or is wearing a poorly fitting pair of rugby goggles. This could also result in harm to team members or competitors.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sale of zero powered contact lenses
Online sales of spectacles and contact lenses
Dispensing vulnerable adults
Sports spectacles for u16

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sale of zero powered contact lenses
Online sales of spectacles and contact lenses
Dispensing vulnerable adults
Sports spectacles for u16
Referrals

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

GOC should do more to regulate and stop online sales of contact lenses and spectacles

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

I think there are more important avenues for DOs to take rather than refraction, however it shouldn't be discounted as an option in the future.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Giving DOs more range in practice - positive

Potential to miss something at the detriment of the PX - negative.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

N/A

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Although the legislation states zero powered lenses can only be sold under supervision of a OO/DO/CLO these lenses are readily available over the counter in shops and online. The sale of contact lenses should be reviewed and online sales in any form should be stopped.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Vulnerable adults
PXs with dementia
Special facial characteristics
Different pathology and physical needs eg nystagmus/posture issues

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages are: better quality of care for PXs

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Not enough barriers for online sales

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This could potentially cause harm to PXs and implicate the registrant.

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

There should be more done to regulate sales

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Zero powered lenses are readily available in high street shops and online. There needs to be more barriers to prevent this.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Only in EXTREME circumstances should a PX be allowed to purchase with in out of date RX and this should only be decided by a registrant. There are no disadvantages to this.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

PX safety is paramount.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

if spectacles are to be sold by a registrant why would sportswear be different.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not Answered

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Online sales

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Not to perform full sight tests, contact lens fitting and sign for prescriptions

7 What activities do you think must be restricted to our registrants?

Please provide details.:

There should be no restrictions to registered registrants involving the whole journey of eye examination to final dispensing and collection.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

They should be continuously monitored and assessed

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

GOC is the only regulatory body which represents us and it should remain as such

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

Very happy with our GOC so far

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

They do not have the practice and knowledge which is necessary and university level

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I think I would not be confident with a Dispensing optician's in the field of the optometrist platform

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Our UK public and us optometrists would prefer for it to remain as now

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Remain as it is since I haven't read or heard any cases where patients sight has been at risk

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Children under the age of 16

Vulnerable adults

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As long as they are trained at college to deal with this group

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

This is rightfully so and protects patients from rogue sellers

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

So much is now available on the internet and we are dealing with eye sight which is irreplaceable if lost

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

This shows that there is our GOC professional body regulating our professional and hence we are regarded and respected for our professional knowledge and services

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would be disastrous

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Whether with prescription or zero power-it is still being inserted in the eyes .
Without proper guidance from registered professional there is risk of loss of sight

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

As above professional guidance always necessary when it comes to eyes

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

To take advantage of the professional services available for eye care

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Patients should have regular sight tests every 1-2 years

Eye health changes and risk of sight loss would increase especially from acute angle closure glaucoma and Chronic open angle glaucoma

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

In an emergency it is acceptable but not otherwise

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Loss of sight is at a minimum with our sight care in Uk being world class currently

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Only in emergency may be inconvenienced

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

This industry is very professional and stable currently and to make drastic changes would destabilise our professional security

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Not sure

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

objective 2 - far too vague
objective 7 - standards shouldn't be modified ad hoc
overarching stat objective should be to protect the public

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

a better question would be what can be they be delegated to do, and this should be determined in consultation with professional bodies, not solely those with large commercial interests.
this would be screening such as OCT, fundus imaging, NCT.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

optometrist - external and internal exam, refraction, prescribing and dispensing specs, contact lenses and low vision aids, installing drops, and medical devices

DO - dispensing specs and safety specs, some delegated functions under Optom supervision

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

therapeutic laser, currently performed by some optometrists in clinical settings working within their competency to do so

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

need to be proportionate and consistent regulation

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

patient safety, better consumer protection, allow profession to progress without being subject to commercial pressures

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

important to avoid costly, excessive and duplication of regulations as this will impact small independent businesses disproportionately .

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

only if they have received training, and they should not be able to issue a prescription.
it is not performed as part of a regular eye exam
patient is not within last 6 months of prescription expiry

Examples of when a refraction might be appropriate:

- To appropriately triage a patient on collection of spectacles when the tested visual acuity is not met.
- To verify an in-date prescription that does not meet BS EN standards prior to dispensing.
- To monitor the progression of myopia at a shorter interval than recommended recall.

Examples of when refraction might not be appropriate:

- To verify an out-of-date prescription prior to dispensing.
- To recommend whether an examination may or may not be necessary.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

for protection of public and patients, there is no reason to make any changes.

If the 2013 statement was removed without restriction, we would regress to a time before the institution of the General Optical Council when a refraction could be performed without an appropriate health check.

This would create a two-tier system with two varying levels of care. It would increase the risk to the public, especially asymptomatic patients who may have macular conditions such as glaucoma; wet age-related macular degeneration; retinal detachment; posterior vitreous detachment; macular holes etc.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

No.

If the refraction element of the examination was separated and patients were given the option of a refraction in place of an examination, patients would be placed at risk. There are many examples of when a patient has presented for a routine examination without any underlying symptoms and a pathological has been detected. In some instances the condition has been life threatening and had Ophthalmoscopy not been conducted, the condition would have gone undetected.

Evidence of this can be found here: <https://onlinelibrary.wiley.com/doi/full/10.1111/cxo.12255>

"A significant number of patients that present for routine eye examinations without any symptoms indicative of ocular disease are subsequently found to have a degree of pathology or risk thereof requiring referral for ophthalmological consultation. These referrals occur for adults under 64 years as much as for all patients of all ages."

I am in agreement with the [journal](#), that believes that the health check and the refraction elements should therefore remain as part of a regular examination. There is no evidence to suggest that current care is prohibitive to patients. Patients across the country have a varied choice in the level of care available to them with many Independent Practices offering both NHS-funded and private examinations. We believe the desirability of its separation is down to the cost-savings for businesses. Placing business needs above patient care is not in keeping with our ethos as independent practitioners.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages:

- Ocular conditions will continue to be detected and referred appropriately. - Regulation remains simple.

Disadvantages:

- Financially, businesses will not be able to utilise cheaper staff to conduct refractions and
- pay optometrists for fewer hours.

Patients would need to be educated to understand the roles of each professional and how they pertain to the examination. Patients already struggle to recognise the difference between a Dispensing Optician and an Optometrist. A change to legislation would further blur the line.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

<https://onlinelibrary.wiley.com/doi/full/10.1111/cxo.12255>

Although surely as a regulator you should have researchers that have already looked into this ?

Also <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4911451/>

value of independent practices producing half number of false positive referrals compared to multiples

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

<https://onlinelibrary.wiley.com/doi/full/10.1111/cxo.12255>

<https://www.sciencedirect.com/science/article/pii/S1888429613000617>

https://journals.lww.com/optvissci/fulltext/2016/07000/value_of_routine_eye_examinations_in_asymptomatic.3.aspx

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

this is for the best interest of the patient , as it reduces risks as outlined in answer to q 22

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

<https://www.tandfonline.com/doi/abs/10.1111/cxo.12588>

<https://onlinelibrary.wiley.com/doi/full/10.1111/j.1755-3768.2011.02120.x>

aftercare essentials for preserving ocular health, maintaining good vision, optimising comfort...

removing existing legislation will increase prevalence of vision threatening infections.

patient safety must be priority

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Patients with prescriptions of +/-5.00 should require in person dispensing to check fitted vertex distance.

those with reduced capacity for consent

those with facial abnormalities requiring specialised dispensing

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

quality of care would increase, GOC would have powers to prevent vulnerable being taken advantage of.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

yes if requirements were further loosened.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

patient may be able to order an incorrect prescription.
without measures in place, patient may place themselves and others at risk if this happens

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

yes, GOC should adopt definition supplied by the College of Optometrists.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

No

Please give your reasons and provide any evidence to support these.:

microbial keratitis is complication of CL wear that is sight threatening
<https://onlinelibrary.wiley.com/doi/full/10.1111/j.1755-3768.2011.02120.x>
<https://www.sciencedirect.com/science/article/abs/pii/S0140673698093854>
https://journals.lww.com/corneajrnl/Abstract/2019/06000/Water_Exposure_and_the_Risk_of_Contact.23.aspx

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

see above q31

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

poor access to zero powered lenses is not a reason of change as patients health will not be affected.
however good access to these lenses, without the safety net of professional care will pose a risk to safety of patients

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Current risks exist from illegal sellers of optical appliances. By removing regulation to place the onus on the patient, we infer that patients are knowledgeable enough to ensure that they can effectively make decisions relating to their health. We know this not to be the case in relation to contact lens sales.

See: <https://onlinelibrary.wiley.com/doi/full/10.1111/j.1755-3768.2011.02120.x>

Regarding the sale of spectacles, patients do not have the knowledge to correctly interpret a prescription. Remote dispensers also do not have the required knowledge of the final fitting of spectacles to modify the prescription to account for the final effective power.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

see answer q 35

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We need to understand whether this refers to a prescription that is expired or without a prescription at all.

The disadvantage would be that the patient would not be protected by the Opticians Act. The Opticians Act was created for this very purpose due to

[redacted] allowing patients to dispense without a valid prescription. We believe that a change would be a step backwards to a time before the Act and we would see a decline in the reputation of the profession and a decline in ocular health on a national level.

Most patients with financial difficulties are supported by the GOS3 voucher. A voucher is issued by the prescriber at the end of a funded examination.

Should prescriptions that are

out of date be permitted to be used, it will not resolve any financial barriers for this group. In terms of equality, these patients with financial difficulties will be required to attend for an appointment to have access to spectacles when there is no barrier to those that have no financial difficulties.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

see answer to q 38

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The disadvantage would be that children would not be protected by registrants that are trained to ensure the appropriate fitting of spectacles, the appropriate advice on wear is issued and the prescription is valid. Our registrants are also DBS registered whilst other sellers have no such requirement.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

see answer q 41

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not Answered

If yes, please give your reasons and provide any evidence to support these.:

Yes.
We believe the further restrictions mentioned in our response to question 23 should apply.
We also believe that a valid prescription must also include the tested visual acuities for any prescribed working distances

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

By continuing to not require visual acuities, practitioners may incorrectly refer patients who require no investigation and/or not refer patients who may inform the dispenser of their reduced visual function and where the dispenser may not recognise a further decline.
This become apparent when patients decide to take their prescriptions to a different opticians.
This may have financial implications for patient and/or practice if an examination is conducted to verify the achieved visual acuities in the newly dispensed spectacles.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

This question is too broad.
Technology and remote care are two different subjects and we cannot attribute the impact of one to the other.
Technology has come a long since the introduction of the Act. Independent practices have been the first to introduce advancements in technology to the wider public. The first OCT machine on the high-street was at an independent. The first FUNDUS imaging machine was at an independent. Non-contact tonometry was at an independent.
But these all have a common thread linking them: these are all diagnostic tools that improve patient care. They have increased our scope of practice and have enabled us to relieve the burden on secondary care. We welcome further advancement in this area. Different types of technologies have different impacts which would need to be explored. We would welcome grouping technologies into various categories that define their functions to better regulate this area.
However, remote care is a separate topic. It is not a diagnostic tool that increases the clinical scope of the profession. Whilst we believe that conversations that are currently held over the telephone (such as triaging) can be instead done via video consultation, we don't believe that we can fulfil the expectation to carry out an examination to current standards remotely.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

full risk assessment is required

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

There is nothing to restrict the testing of sight of a patient by an unregulated professional that is situated in another country via remote care technology. They would fall outside the jurisdiction of the GOC.
The risk to patients is that they are unregulated and could cause harm. The patient may not realise that they are being seen by an unregistered individual

and may feel the examination was mis-sold. There is also risk in the GOC not being able to enforce the Act on the individual as it will continue to happen. We know this to be true from the sale of contact lenses by overseas sellers. Over the years the GOC has not been able to enforce rules on these sellers.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

The GOC should be more proactive and engage with stakeholders including the MHRA to address risks to patients. Impose restrictions on the ability to conduct an examination remotely without being a GOC registered Optometrist and in a position to conduct the necessary tests to assess a patients ocular health. This should be inclusive of the ability to refract. e.g. If a lid inversion cannot be performed remotely by the practitioner, no examination must be conducted at all as it cannot be performed in part.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

1)

"1 (b)subject to the following provisions of this section, any optical appliance or zero powered contact lens unless the sale is effected by or under the supervision of a registered medical practitioner, a registered optometrist or a registered dispensing optician."

Supervision is not clearly defined. It is not clear whether that means being physically present with the patient or if it means that the registrant can validate the prescription remotely.

2) Evidence suggests online sellers of optical appliances do not require a back vertex distance to dispense spectacles. Due to effectivity, this could mean that for prescriptions exceeding ± 5.00 the power of the appliance as worn could vary significantly from what was issued. For example:

A lens of power -9.00 DS with a Back Vertex Distance(BVD) of 8, may be dispensed and when received it may fit at a BVD of 10. This would make the effective power -8.84 and would fall outside of BS EN ISO 21987.

3) The GOC does not have powers to regulate the online sales of contact lenses by foreign companies.

4) The online sale of multifocal spectacle lenses

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

1. Define the required level of supervision needed to ensure patient safety when verifying prescriptions.

2. Restrict online sale of spectacles to powers not exceeding ± 5.00 so as to comply with BS EN ISO 21987.

3. On the assumption that compulsory registration with the GOC will be required. Require contact lens manufacturers and dealers to become business registrants and to verify that the businesses they supply to are not selling contact lenses to UK consumers without having GOC business registration.

4. Restrict the online sale of multifocal lenses.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I am in agreement with the the ^{proposed} ask that General Practitioners (GPs) have their ability to prescribe revoked.

They also ask for the removal of the sections that allow Workers of the Crown to purchase spectacles without a valid prescription.

The term 'Testing of Sight' to be replaced with 'Ocular Examination', with further clarification as to whether the examination is in 'Full', 'Internal only' or 'External only'.

Replacement of '...title of registered optometrist' with 'title of optometrist' from Section 28(1)(c)

Section 26(1)(b)(i) should be more than 'that he has carried out the examinations that the regulations require'. Should an Optometrist issue such a statement today without a prescription, they would bring the profession into disrepute.

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The Act should be amended to allow for secondary regulation to define the scope of new technologies.

Removal of restrictions that prevent a registrant from being interred into a second register. i.e. An Optometrist on the GOC register should be permitted to become a registered Dentist and be entered onto the GDC register without falling foul of the Opticians Act. Registrants who are erased from the register for failing to meet the required CPD points should be permitted to apply for restoration once the required number of CPD points have been

attained.

Also <https://onlinelibrary.wiley.com/doi/full/10.1111/opo.12585>

"There has been very little open debate in the UK about the potential significant risks of the current rapid expansion of undergraduate optometry student numbers, an expansion that may not be in either the interest of the public seeking eye-care, the regulator with responsibility for public protection, optometry professionals or the wider profession. There is a clear risk of a significant decline in standards, and at a time when the profession has never before had such a great opportunity to work in improving its lot with an enhanced scope of practice for the benefit of all. With all of these potential risks, there is a pressing need for high quality research on the future optometric workforce requirements, to include input from all stakeholders, in the development of a framework for strategic workforce planning at a national level."

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction and health check of eyes.
Interpreting results of pre-screening
Dispensing
Contact lens checks
Supply of contact lenses

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction and health check of eyes.
Interpreting results of pre-screening
Dispensing
Contact lens checks
Supply of contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:

Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:

Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Interpreting pre screening results of all kinds

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Refraction is tied in with ocular health and pathology so should be examined together. I can't see how these two important things can be separated without introducing risk to patient, poor refractive outcome, and patient dissatisfaction and loss of confidence in the profession.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients are safer when legislation is there to protect the outcome of their sight test. Separating refraction and ocular health check would introduce risk to patients.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Contact lenses fitting is regulated and even now, contact lenses can be bought online without a valid prescription. This is a risk to patients. If deregulated more, more loop holes will appear that will put patients at risk. Deregulation potentially causes more cl complications and referrals to secondary care. This is exactly what we are trying to avoid.

Keep cl regulation at least as strict as now. Deregulation of this area should not happen.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not Answered

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

CPD is now time consuming rather than focussed on learning.

CPD is One easy way to promote retirement in profession.

Previous CET worked well. We should go back to that system. We learnt but hassle-free.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

I'm afraid I've only been getting familiar with the Opticians Act and various GOC regulations for 37 years so haven't had time to fully digest it all, but seriously this is a mammoth undertaking to feedback on. Anyone trying to do it justice and provide meaningful evidence will require a word count broadly equivalent to a Masters Degree dissertation and I can't imagine any patient representative group or individual patient having the wherewithal to respond to a consultation of this nature.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Standalone automated refraction

Standalone manual refraction and binocular vision assessment

Dispensing restricted categories of patient (with restrictions increased to include vulnerable adults)

Delegated functions of the sight test (currently the 2013 statement that no part of the sight test may be delegated is flouted routinely)

- ophthalmoscopy / retinal examination

- focimetry

- non-contact tonometry (NCT)

- instillation of eye drops

- visual fields

- OCT

- Fundus photography

- pachymetry

- topography

- automated refraction

- manual refraction and binocular vision assessment

Additionally the GOC should get a grip on aspects of eyecare relating to children with learning difficulties such as colorimetry (Myers Irlen Syndrome, coloured lenses etc), and behavioural optometry in a way that does not leave patients and practitioner high and dry but provides sensible regulation and standards of practice.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Standalone automated refraction

Standalone manual refraction and binocular vision assessment

Dispensing restricted categories of patient (with restrictions increased to include vulnerable adults)

Delegated functions of the sight test (currently the 2013 statement that no part of the sight test may be delegated is flouted routinely)

- ophthalmoscopy / retinal examination

- focimetry

- non-contact tonometry (NCT)

- instillation of eye drops

- visual fields

- OCT

- Fundus photography

- pachymetry

- topography

- automated refraction

- manual refraction and binocular vision assessment

Additionally the GOC should get a grip on aspects of eyecare relating to children with learning difficulties such as colorimetry (Myers Irlen Syndrome, coloured lenses etc), and behavioural optometry in a way that does not leave patients and practitioner high and dry but provides sensible regulation and standards of practice.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Practice relating to Myers Irlen Syndrome and the provision of coloured lenses for the relieve of symptoms of dyslexia and other learning difficulties.

Behavioural optometry

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Refraction for dispensing opticians

On the other hand I feel all the additional shared care certificates in glaucoma etc are unnecessary as they are little more than a repeat of core undergraduate learning and function as a gatekeeping exercise to limit the number of practitioners able to serve the public. Currently there are 2 Million people living with sight loss - does lack of services contribute to this?

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

We need a level playing field where all suppliers of optically related medical devices and services are subject to the same rules and all are registered.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Not Answered

Please give your reasons and provide any evidence to support these.:

Yes but inspection should be ad hoc as needed not routine - the threat is enough

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

All staff should be trained and qualified at some level as optical assistants (as happens in pharmacy) and you could consider the dental model where all staff are registered if they have any clinical interaction with patients.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

I must challenge the notion that no part of the sight test may be delegated, as clearly this happens every day.

In 2013, in response to a case (GOC v [redacted] which I attended – it may be worth consulting the transcript) that involved a contact lens optician who, having completed the “delegated functions course” in refraction two decades earlier, had conducted around 50,000 refractions under the supervision of an optometrist. The GOC agreed that [redacted] was entitled to refract, just not for the purposes of a sight test, and as a result issued the following statement on testing of sight:

“Refraction for the purpose of issuing a prescription is an essential part of the sight test[1]. As such, refraction for the purpose of sight testing is restricted[2] and can only be conducted by a registered optometrist, a registered medical practitioner or a student optometrist under supervision. No part of the sight test can be delegated to a dispensing optician or contact lens optician, even under supervision.

Refraction for purposes not associated with the testing of sight, for example to verify a prescription issued by an optometrist or registered medical practitioner, is not restricted. This can therefore be undertaken by dispensing opticians and contact lens opticians.”

It also included the following footnotes

“[1] under Section 26 of the Opticians Act 1989 (as amended by the Opticians Act 1989 Amendment Order 2005) and the Sight Testing (Examination and Prescription) (No. 2) Regulations 1989.

[2] by Section 24 of the Opticians Act and Rule 3 of the Testing of Sight by Persons Training as Optometrists Rules 1993.”

Critical evaluation of this statement with regards to what actually happens in practice has caused me to question whether or not this has a legal foundation, and if so, to ask why are other areas of the sight test so clearly and demonstrably delegated every day of the week in hundreds, if not thousands of practices throughout the UK?

If no part of the sight test may be delegated then how is it that visual field tests, fundus photography and non-contact tonometry are routinely delegated to support staff. Does this mean that the GOC intends refraction to be delegated to non-qualified optical assistants to the specific exclusion of dispensing opticians and contact lens opticians? Clearly this is not the intention, so perhaps my confusion relates to the legal definition of what constitutes a sight test.

The Opticians Act 1989 (as amended 2005) states in Part IV, Section 24:

24 Testing of sight.

(1) Subject to the following provisions of this section, a person who is not a registered medical practitioner or registered optometrist shall not test the sight of another person.

(2) Subsection (1) above shall not apply to the testing of sight by a person recognised by a medical authority as a medical student, if carried out as part of a course of instruction approved by that authority for medical students or as part of an examination so approved.

(3) The Council may by rules exempt from subsection (1) above the testing of sight by persons training as optometrists, or any prescribed class of such persons, in such cases and subject to compliance with such conditions as may be prescribed by the rules.

(4) Any person who contravenes subsection (1) above shall be liable on summary conviction to a fine of an amount not exceeding level 5 on the standard scale.

Clearly Section 24 of the Opticians Act is not the source of the rule that no part of the sight test may be delegated. So where does this information that is regurgitated in the 2013 statement above originate? Could it be Section 26 which indicates:

26 Duties to be performed on sight testing.

- (1) The Secretary of State may by regulations provide that, subject to any exceptions specified in the regulations, when a registered medical practitioner or registered optometrist tests the sight of another person, it shall be his duty—
- (a) to perform such examinations of the eye for the purpose of detecting injury, disease or abnormality in the eye or elsewhere as the regulations may require, and
 - (b) immediately following the test to give the person whose sight he has tested a written statement—
 - (i) that he has carried out the examinations that the regulations require, and
 - (ii) that he is or (as the case may be) is not referring him to a registered medical practitioner and if he is referring him, the reason for the referral.
- (2) Except where regulations under subsection (3)(b) below specify otherwise, it shall also be his duty to give the person whose sight he has tested, immediately following the test, either a signed, written prescription for an optical appliance or a signed, written statement that he does not need to wear or use an optical appliance.
- (3) The Secretary of State may by regulations specify—
- (a) particulars to be included in a prescription or statement provided in fulfilment of the duty imposed by subsection (2) above; and
 - (b) that that duty does not arise where a person is being fitted with contact lenses as part of the medical or clinical treatment provided for an eye condition.
- (4) A person shall not be required as a condition of having his sight tested—
- (a) to undertake to purchase from a specified person any optical appliance the testing of his sight may show he requires to wear or use; or
 - (b) to pay a fee before the testing is carried out.

Clearly section 26 does not help us find out where it says in law or regulations what may or may not be delegated, but there are regulations alluded to within section (1)(b)(i) that may be able to shed light. The Sight Testing (Examination and Prescription) (No. 2) Regulations 1989 contain a section entitled "Examination" which states:

- 3.—(1) Subject to the exceptions specified in paragraph (2), when a doctor or optician tests the sight of another person, it shall be his duty—
- (a) to perform, for the purpose of detecting signs of injury, disease or abnormality in the eye or elsewhere—
 - (i) an examination of the external surface of the eye and its immediate vicinity,
 - (ii) an intra-ocular examination, either by means of an ophthalmoscope or by such other means as the doctor or optician considers appropriate,
 - (iii) such additional examinations as appear to the doctor or optician to be clinically necessary; and
 - (b) immediately following the test to give to the patient a written statement—
 - (i) that he has carried out the examinations required by sub-paragraph (a) of this paragraph, and
 - (ii) that he is or (as the case may be) is not referring the patient to a doctor.
- (2) The provisions of paragraph (1) do not apply where the testing of sight is carried out by a doctor at a hospital or clinic in the course of diagnosing or treating injury or disease of the eye.

I find it interesting that the GOC and [redacted] are currently making excuses about how parliament is busy, and it will be better to settle for a few important changes to the Opticians Act than, for example, pursue what the optometric establishment clearly believes to be flights of fancy on the part of a minority of dispensing opticians yet all low vision opticians and contact lens opticians could provide a better service to their patients if they could issue the changes in prescription they routinely find. If we must prioritise then we should not lose sight of the fact that we are here to serve patients, to protect them from harm and provide them with the ability to make a choice on how they receive their eyecare provision. Anything that makes our lives easier in the professions or the GOC is merely a side effect of serving the public, however if we are to concentrate on ONE thing then this should be the ability of the GOC to write its own rules and to have independent prosecutorial powers.

Back to delegated functions. In a recent GOC fitness to practice webinar (16th March 2021) (<https://www.youtube.com/watch?v=VPQisSvNmYc>) it is clear (in case 4 at around 45 minutes) visual field plots are considered to be diagnostic in nature, rather than screening. It is helpful however to define screening as opposed to a diagnostic test.

According to <https://www.nhs.uk/conditions/nhs-screening/> screening is a way of identifying apparently healthy people who may have an increased risk of a particular condition. The NHS offers a range of screening tests to different sections of the population.

The aim is to offer screening to the people who are most likely to benefit from it. For example, some screening tests are only offered to new-born babies, while others such as breast screening and abdominal aortic aneurysm screening are only offered to older people.

Screening therefore is checking for disease when there are no signs or symptoms, and since it may find diseases at an early stage there may be better chance of successful treatment / cure. Certain optometric procedures, such as visual fields, non-contact tonometry and fundus photography might be considered screening but could also be considered diagnostic in nature.

A screening test should therefore by definition be done routinely on asymptomatic patients that fit the screening criteria. A straw poll of optometry and ophthalmic dispensing students, who all work full time in practice, and of qualified registrants at CET / CPD events reveals that no such screening criteria exist in most practices and tests are often only conducted on the request of the optometrist or if the patient can be persuaded to pay separately for them over and above the GOS / private fee and are therefore not screening tests as usually defined.

A test that forms part of the statutory sight test cannot be delegated, therefore pre-testing, and any fields, fundus or other test conducted after the session in the optometrist's room are not screening and cannot be delegated to optical assistants. At the heart of the case involving the death of [redacted] ([redacted] (GOC v [redacted]) is a failure of communication between the pre-testing assistant and the optometrist who it was decided had looked at the wrong image on the computer. Had this procedure not been delegated it is possible the optometrist might have been spared conviction for gross negligence manslaughter (overturned on appeal), 10 years of fitness to practice hearings, a decade of lost income and an irretrievably damaged reputation. It is also possible that, had the function not been delegated, or had it been delegated to a registered dispensing optician rather than an assistant with potentially no real training or qualifications, a timely referral may have occurred and a young life may have been prolonged or saved.

Sorry to go on for so long, and I appreciate this is only a part of ONE of the 55 questions, but it needs to be recognised that the status quo is wrong. When the delegated functions refraction course (which I have a copy of) was approved so was the delegation of pre-screening on the basis that it was SCREENING, however because large practices are too busy now and not prepared to give up the space or invest in the necessary equipment, most of these "screening" tests are only performed on request and therefore usually after the diagnostic "sight test" (as narrowly defined in law). They are

therefore diagnostic in nature and NOT able to be delegated, especially if they are repeat measures, yet this happens all the time. My point here is that many functions of the sight test are delegated so why not refraction? Or why not enforce the rules as stated that NO function may be delegated. Or better still why not allow stand alone refraction by dispensing opticians

I have been provided with considerable documentation from our Canadian friends in British Columbia who recently celebrated 10 years of opticians conducting standalone refraction which has not led to increased patient harm. I will happily provide this documentation and more in a future iteration of this consultation

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

I have always worked in areas where a proportion of my patients would have their eye health examination privately from an ophthalmologist - all big cities have this type of private medical practice typified by Harley St in London, Rodney St in Liverpool etc - and then visit a dispensing optician for dispensing. Many ophthalmologists would rather not refract and in this environment it would make sense for dispensing opticians to be able to refract and issue the prescription for the spectacles they supply. This would then enable growth of niche aspects of spectacle dispensing including personalised lenses based on wavefront aberrometry (therefore meaning the patient wouldn't have to undergo two sight tests). Low vision opticians and contact lens opticians would be able to prescribe the changes they find subject to certain limits which are well described in the British Columbia model although I would prefer in the UK dispensing opticians were required to conduct binocular vision assessments and able to prescribe prism if required.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It prevents the use of state of the art wavefront guided autorefraction and the dispensing of spectacles that correct for the aberration within the eye - this is particularly useful in case where the eye is distorted in some way such as keratoconus where currently patients are forced to move into contact lenses when ordinary spectacles don't provide clear vision any because of the irregular astigmatism. These patients report a great improvement with wavefront guided spectacle lenses which in some cases can prolong the patient's usable vision meaning they keep their driving licence for longer for example.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Sight testing needs to be redefined - in other jurisdictions sight testing means simply that - measuring vision and determining the required prescription to restore vision to normal (or best corrected) levels. It should be differentiated from an eye health examination as they are separate things even if one practitioner may do both or the patient may obtain a sight test from one supplier and their eye healthcare from another.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

2%-5% depending on demographic - higher in retirement communities and deprived areas. You can get accurate data from the NHS.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

I'll be happy to provide supportive data in future please contact [redacted]

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It would still allow the supply of lenses that do not conform to the specification that the patient has been provided with. This makes no sense and was clearly not the intention of the legislators.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Children, patients registered sight impaired, other patients with low vision, vulnerable adults

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

it would protect more vulnerable patients from abuse, including material / financial abuse of patients in their own home.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Suppliers should not need to verify a specification with an optician - a facsimile copy / scan should be sufficient providing they are replicating the lens

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

It needs tightening up to reduce the harm that is already happening

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

It is unnecessary to verify if you have a facsimile copy of the original on file, however it should not be permissible to substitute lenses as this causes unnecessary distress and harm.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Make it easier for patients and suppliers, however the loophole where suppliers substitute lenses because the law is really badly written needs closing.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Tricky but yes

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

if they are relaxed

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Currently opticians aren't really fitting these lenses and almost all supply is illegal.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

It should be possible to prescribe and supply glasses and contact lenses without an eye health examination as it is most countries of the world. The liability for incorrect prescriptions then falls on the prescriber and not the healthcare provider.

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

It should be possible to prescribe and supply glasses and contact lenses without an eye health examination as it is most countries of the world. The liability for incorrect prescriptions then falls on the prescriber and not the healthcare provider. It should be mandatory in this situation for the patient to have had an eye health examination at some specified point in the past. For children this might be in the previous 5 years, for adults under 40 this might be in the past 20 years, however for over 40s this might reduce to every 5 years, and every 3 years for over 60s as risk of eye disease increases.

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Currently hardly anyone complies with the 1984 rules - there is no way currently internet suppliers who sell specs over +/-5.00D can check vertex distance and compensate the Rx - they have been breaking the law for over 20 years but are untouchable because they aren't registered and the GOC does not have the power to prosecute without resorting to private prosecution.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients would be dissatisfied as they have a right to expect the best vision possible - prescriptions (unlike eye health) change very 2-3 years on average and a simple refraction and vision check is in itself a good indicator of whether something more sinister is responsible for a drop of vision.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No real impact except if GOC had powers to prosecute there would be more compliance

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Yes

If yes, please give your reasons and provide any evidence to support these.:

We need to consider the supply of electronic low vision aids which often run to £1,000s, or consider registering all suppliers of low vision services

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The system isn't too bad however plenty of suppliers break the law because they know they won't get prosecuted

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

to follow next time

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes - a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

currently refraction is tied to eye health examination - the sight test needs redefining as refraction / vision check and differentiating from an eye health examination howsoever provided.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

the risks are mainly relating to financial fraud and data theft

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

not at moment

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

GOC needs the power to prosecute as the law is broken every day thousands of times a day. We also need every business that sells medical appliances - specs, contact lenses etc - to be registered with the GOC.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Business regulation / registration
Power to prosecute

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

to follow

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

to follow

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

most of it

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

to follow at future consultation

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

We feel that objective 1 should be amended to "Enhancing patient and public safety". The aim of reviewing the legislation should be to improve the protections currently offered, not to maintain the status quo.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

We do not feel there should be any change to this area of the legislation.

Restricted functions should continue to include:

Fitting and aftercare of contact lenses (including zero power/cosmetic lenses).

Carrying out a sight test

Selling optical appliances (including spectacles, contact lenses, sports wear, etc.) should be under the supervision of a registrant.

Use of protected titles (as an individual or business)

7 What activities do you think must be restricted to our registrants?

Please provide details.:

We do not feel there should be any change to this area of the legislation.

Restricted functions should continue to include:

Fitting and aftercare of contact lenses (including zero power/cosmetic lenses).

Carrying out a sight test

Selling optical appliances (including spectacles, contact lenses, sports wear, etc.) should be under the supervision of a registrant.

Use of protected titles (as an individual or business)

The current restrictions do not appear to have presented any barrier to the development of extended professional services (for example MECS/CUES, glaucoma shared care, etc) which have proven to be of significant benefit to the patient and wider health care system. We would welcome inclusion of these extended services in the regulations and/or guidance to provide the correct legislative framework for the roles.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

We would welcome expansion of the regulations and/or guidance to include delivery of enhanced services (e.g. CUES, glaucoma referral refinement, stable glaucoma monitoring, etc.) This would provide clear regulatory guidance to practitioners thus protecting patient safety.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

Where obtaining an additional qualification allows the practitioner to extend their scope of practice beyond core competency then these qualifications should be recognised by the GOC and recorded as such on the register, for example Professional Diploma in Glaucoma allows the registrant to diagnose and manage OHT without supervision from a consultant ophthalmologist.

Having a register of post-registration qualifications would enhance public safety by allowing patients and other authorities to easily confirm the qualifications which a registrant claims to hold. This would also assist health authorities and others who may be considering commissioning services to determine whether this would be possible with the number of appropriately qualified registrants in the area.

However we do have concerns that recognition by the GOC may also bring the requirement of additional qualification specific CPD (as is the case for CLOs and IP) which may discourage practitioners from pursuing additional qualifications due to time and cost constraints. This may not be in the public interest if it discourages practitioners as there may not be an appropriately qualified work force to deliver any enhanced services

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

Yes, in the GOC's own words.

The GOC believes the proposed changes would enhance its ability to protect and promote public health and safety. They would also remove the current system of complex registration requirements and empower the regulator to take action against any business that fails to meet its standards of conduct.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

It is important to have proportionate and consistent regulation of optical businesses, and to avoid excessive, costly and duplicate regulation of primary eye care.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

The current system of regulation is sufficient and there have been no instances of harm reported.

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

We think this could be an excellent opportunity for professional development for those who wish. However with the following caveats:

- Paediatric and sight impaired refraction should be optom only
- There needs to be training and requirement to prove competence – for some training on refraction may be limited to some experience at uni many yrs ago
- Refraction and Eye Health must both be required together - there should be no separation
- DO should be responsible for the sign off of the refraction but OO should take overall responsibility for sign off of the full journey through refraction and eye health checks.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Advantages:

- career development/progression opportunities for DOs (akin to OOs doing IP, glaucoma care, etc.).
- improved use of resources - in many areas OO time is increasingly devoted to enhanced service provision so DOs providing refraction would potentially support the capacity demand in those areas.

Disadvantages:

- requires relationship of trust where OO is taking responsibility for over all examination where refraction provided by DO. Legislation needed to clearly mark boundaries of responsibility.
- Need to consider history taking - forms an important part of the whole examination - may be little benefit if this had to be done by both OO and DO, but if only done by one person then some information may be missed which would be relevant to the other parts of the complete examination.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

We feel that refraction and checking of eye health should always be linked. However there are cases where fully completing some aspects may be unnecessary.

For example:

- child with rapidly progressing myopia on 6/12 recall – check symptoms, complete refraction, perhaps check fundus images and/or history for sign off. In the absence of any suggestive symptoms completing full external and internal examination of the eye may be unnecessary in a very low risk group for pathology and could be done annually.
- patient attends 12/12 after cataract surgery with reduced VA one eye. Pin hole may be enough to confirm that VA reduction is not likely linked to

refractive change, but then full check of eye health to determine PCO, and refer for YAG.

Practitioners should be able to exercise professional judgement in such cases.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We believe that the regulations provide an important function in protecting public safety. Any changes (e.g. as suggested in Q15-17) will need to be carefully considered and should not at any stage remove the link between refraction and checking eye health. Explicitly we feel that patients should not be issued with a prescription or be able to purchase prescription glasses without examination of eye health.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Contact lens wear carries risk (from minor to sight threatening) and as such contact lens fitting and supply should always be restricted. Furthermore we would welcome tighter restriction of overseas supply of contact lenses without a valid specification as, in our experience, these patients rarely access aftercare unless there is a serious problem, at which point damage may already be done.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We feel that fitting of contact lens legislation should in no way be relaxed as there are significant patient safety concerns around supply of lenses without appropriate professional oversight. As question 21 we feel that regulations on supply should be extended to include overseas supply. We do accept that this will come at a financial cost to patients due to the need to pay for professional time but suggest that this will be moderated by the competitive nature of the contact lens market.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

We feel that the current restrictions are adequate to protect patient safety.

Although further restrictions could possibly protect vulnerable people (e.g. from unscrupulous sales tactics in private home setting where there are fewer safeguards) we are concerned that requiring DO/OO to be present for every visit (e.g. glasses delivery/fitting) would increase cost for patients so would not be in their best interests.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

We feel that current legislation acts to protect the public but we feel that this should be extended to all contact lens supply including overseas - as in questions 21/22

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

If restrictions were relaxed (i.e. the ability to purchase contact lenses without a valid specification) then it would seem likely that there would be an increase in contact lens related complications (including acanthamoeba keratitis which is already known to be on the rise in the UK).

As question 21/22 we feel that restrictions should be extended to overseas supply

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

However, as previously, we feel that this requirement should be met by all suppliers whether UK based or overseas.

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

We feel that removing the requirement would be a significant risk to patient safety. There are well documented risks associated with contact lens wear so supply of contact lenses should always be to a valid specification providing the best professional oversight possible to minimise these risks.

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

We do not feel that this is required as there are excellent professional guidelines produced by the professional bodies in the UK which provide a framework for appropriate aftercare.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Zero power lenses are often older lens materials with associated higher risk of complications. It is important that wearers are educated in this risks of contact lens wear and how to mitigate those risks (for example zero power cosmetic lenses are often worn for parties so there may actually be a higher risk of patients sleeping in lenses leading to increased risk of microbial infections.)

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

see Q30

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

We feel that supply of all contact lenses (prescription or zero power) carries risk as such should continue to be governed by the same regulation. As previously we feel that regulation needs to apply to all suppliers (UK and overseas)

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Although reducing legislation on zero power contact lenses would undoubtedly result in financial benefit for the patient (professional oversight will cost more) it serves to protect the public from harm associated with contact lens wear, especially in a group where there is no opportunity for appropriate education on risk mitigation.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

We feel that the current regulations do allow for a competitive market in the UK whilst protecting vulnerable groups from risk of harm

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

n/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

As Q34 - We feel that the current regulations do allow for an open and competitive market in the UK whilst protecting vulnerable groups from risk of harm.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

We feel that current legislation protects the public by encouraging regular examination of eye health as part of the sight test. Removing this requirement would likely lead to a rise in undetected pathology (e.g. glaucoma) until the patient experiences symptoms, at which point the damage may be irreversible.

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Although relaxing the requirement would remove the cost associated with an eye examination for some (where not covered by GOS/NHS), there would be a significant risk to public health from undetected (asymptomatic) pathology which would have quality of life impacts for patients, and cost impacts for society (increased cost to the NHS, social care, etc.) Regular eye examination also plays an important role in other areas such as falls prevention and road/driver safety.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As Q38 above. The minimal cost benefit to some patients (the requirement for some to pay for a private eye examination) seems to be far outweighed by the health and society benefits of regular eye examination.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

There is a risk to the lifetime eye health from inappropriate/inaccurate supply of sports wear optical appliances to under 16s. This could be short term such as accidents/injuries due to inappropriate provision, as well as long term consequences such as amblyopia developing.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As with other areas, removing the requirement for professional oversight might reduce the cost to patients (perhaps less to in the case of under 16s due to the NHS provision of eye examinations). However we feel that this would be significantly outweighed by the risk as outlined in Q40

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Legislation provides appropriate protection to prevent risk of injury.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

As above, we feel that regulations are broadly appropriate to protect the public, with the exception of overseas supply of contact lenses.

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The current regulations seem to provide an appropriate balance resulting in good public safety within the profession.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The development of remote care during covid 19 has enhanced patient care by allowing improved/easier access to many and we would wish to see this continue.

The use of AI (e.g. as part of OCT) enhances pathology case finding but we feel that it should only be used under professional supervision and as part of a comprehensive eye examination.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Remote care allows patients to receive care in a manner which is most appropriate for them. Some may prefer to attend in person which is easily facilitated, others find remote care to be a convenient way to access care (whether through frailty, not interrupting work/family commitments, etc.)

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

There have been many technological developments already which have not in any way been restricted by the act.

We would welcome improved guidance on the use of technology (in all forms) in practice. It would better protect patients to have guidance in place, than to wait for incidents to arise and then rely on case law to inform the profession.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

as Q47 - We would welcome improved guidance on the use of technology (in all forms) in practice. It would better protect patients to have guidance in place, than to wait for incidents to arise and then rely on case law to inform the profession.

We would also welcome clarification on overseas remote care - all providers should be held to the same standards (qualification, registration, indemnity, etc) to protect the public safety. Any overseas provision of remote care must include the facility for face to face follow up if required or there is a risk to patient safety, as well as the possibility of additional burden on the NHS (e.g. patients attending eye casualty due to poor remote care with no follow up option)

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Improved professional guidance (evidence based) on the use of technology in practice. This should include, for example, whether use of technology alone (OCT/fundus photography, etc.) constitutes an appropriate examination of fundus health.

Specific regulation on overseas provision of remote care - as Q48.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Yes, the ability to use overseas suppliers for this avoids all of the protective functions of the GOC (Opticians Act and Guidance) and as such is a significant risk to patient

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

We presume that this would require further UK regulation on the import of optical appliances (i.e. importers would need to be regulated).

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

We would welcome updated guidance to cover enhanced services (IP, glaucoma care, pre/post cataract assessment, etc).

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Professional/representative body

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

No Change

7 What activities do you think must be restricted to our registrants?

Please provide details.:

No Change

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

no

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

No

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

There is no evidence to support separating a refraction(the testing of sight) and eye health examination.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No Change. The current sight test legislation should remain as it is the interest of public and patient safety.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

5.1 percent

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

It is our firm believe that the best way to mitigate avoidable sight loss is to maintain the sight test as currently defined by the act.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Danger of change

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

n/a

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

as per q21, 22,25

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no change

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

n/a

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

no change

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

unnecessary and risky

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

as above

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

unnecessary and risky

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Refer to above

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

see q38

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

n/a

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

No

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

n/a

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Non registrants should not be selling/dispensing contact lenses or spectacles without the supervision of a registrant

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sight test/eye examination, Funduscopy and importantly refraction should be restricted to Optometrists

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not Answered

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Many Optical Businesses base their model on the sale of spectacles ideally on a change to a persons refractive status. Unfortunately they dont really appreciate Optometry as a whole and what it can deliver. Things have changed positively over the years for Optometry but that model still remains. Having DO as a refractionists will only fuel many companies to follow the ideaolgy that the only thing that matters is a change in ones prescription. More DO will then be employed to replace Optometrists (OO) in the workplace as this is more cost effective and thus there would a be decline for OOs and subsequent OO wage. More universities are already churning out OO reducing demand and thus salaries. adding the delegation of refraction to the equation will only make matters worse for a profession that has fought long and hard to be taken at its merit. Lets face it, the multiples would jump on this and replace OOs quickly. I believe the public would not get the service and level of care they deserve and it would become a tiered service. Our profession is worth more and refraction has always been integral to us for good reason.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

currently in Scotland, a refraction can be separated from a health check in certain clinical circumstances. Eg someone presents with a sore red eye. We would not necessarily refract this patient but measure their VA at this visit. The aim would be to treat the underlying condition first and then perform refraction when indicated.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

No

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I am aware of an Optometrist doing this. She reports that it is good for the patients who are unable to get Optometry cover in that part of the country however the Optometrist is reliant on a non professional moving the equipment about for the examination. She reports that It is not as detailed as having the patient in front of you and there is always the risk that you may miss something because it is not the same as you being in the same room and having the same observations seen by your own eyes as apposed to a screen/camera

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

My opinion on remote care using technology should be limited to circumstances where it is not practical or feasible for the public to attend an Optometry Practice or Optometrist cover is limited.
see above

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I feel strongly that the GOC should gain powers and put into legislation that Optometrist/registrants should not be put under financial pressures from their employers.

Employers/Optical businesses should be regulated to not impose financial targets upon registrants and to allow them to focus on delivering care to the public that presented to them. It is naive to think this practice does not happen and it needs input from the GOC to protect the registrants and public alike

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

see above

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Selling of prescription spectacles and contact lenses and eye drops

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Provision of eye examination and supply of any eye related items like spectacles, prescription sunglasses eye drops and contact lenses and solutions

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Also dry eye drops and contact lens solutions

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

We should have a registered body that offers gold standard certification of our qualifications and earn more respect from the general public and other professionals

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

Naturally a small independent will have limited resources compared to a larger multiple and appropriate fees should be applied and help given accordingly

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

It's important to treat each business whether a small independent or a large multiple with the same scrutiny as it appears that a lot of leeway is awarded to the bigger groups as they have more lobby and representation in the regulatory bodies

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Whilst the model of the "American style " separation of clinical and commercial practice may work well the remuneration of the time taken for a full eye examination should be addressed as it's non compete with the appalling fees awarded by [redacted]
Also there's a fine line sometimes where the visual acuity changes and the pathology present in a person needs to be examined together to do justice to the patients

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Competition of a small independent who may not necessarily have a DO who can carry out a sight test

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financial is the main problem I envisage

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

Every practice must have a way of analysing how many referrals are made compared to the number of eye examination performed

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

There are so many unregulated people selling contact lenses that the GOC haven't been able to tackle and the increased regulation on the regulated bodies cause loss of income as we can't compete on price and also when things go wrong it's the regulated people who pick up the burden

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages are that the patients get a full service considering that any application of contact lenses whether with prescription or Plano can have detrimental effects on the eyes depending on advise given

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If a person is trained properly to fit and supply optical appliances to a vulnerable person then further restrictions are limiting the process more and can cause a financial burden to most practices

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these.:

Why is it that there are unofficial People supplying contact lenses freely without any regulations imposed on them

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

It's an application on the eye surface so lots of things can go wrong and it sometimes maybe too late to pick up a problem

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

As long as it's applied to everyone who supplies contact lenses

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financial and medical as free for all

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

The full check up of what's involved in the suitability of a person who is supplied with contact lenses

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Yes

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

This is a medical appliance whether Plano or prescription as it's the material effect on the eyes and use of it that can cause problems if inappropriately prescribed as well as no usage information supplied

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

As above

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

All contact lenses are medical devices and should be supplied under supervision by an appropriately qualified person

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages as unfair to the regulated companies

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Should have fair and appropriate regulations on everyone involved in supply of optical appliances

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Inappropriate appliances dispensed and loss of faith in the qualified people

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

These are medical devices and the public should be made aware of this otherwise why have any qualifications for an optometrist or a dispensing optician

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Everyone should be encouraged to have regular eye examination as it's good practice like the dental exams as early diagnosis of problems makes best practice

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Why have qualified DO's and optometrist who have been through a huge financial burden of qualifications and then anyone can supply optical appliances?

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Best practice

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If a prescription is required then it is best under the jurisdiction of a qualified optometrist or DO

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Appropriate appliances supplied at a reasonable cost

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Financial

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Not applicable

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Are they appropriate and who checks this

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Qualified people

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not Answered

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

7 What activities do you think must be restricted to our registrants?

Please provide details.:

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dispensing of myopia control spectacle lenses

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not Answered

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Not Answered

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Not Answered

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patients could be supplied with contact lenses without having aftercare and to a specification that is out of date. This would be detrimental to the patient, and in the case of any problems arising from this could bring the optical sector into disrepute and patients could lose confidence in opticians

29 Do you think the Act should specify a definition of aftercare?

Not Answered

If yes, please specify what you think the definition of aftercare should be.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not Answered

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

Non registrants aren't trained enough to make a decision that would be in the best interests of the patients. Also 2 years is actually quite a long time

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages - easier for the patient to get new glasses without requiring an eye exam

Impact - patients would get their eyes tested less frequently. Would lead to eye health issues going ignored.

People would be wearing prescriptions that are not best for their eyes

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality,

diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not Answered

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

They lower standards of care for eyes and sight.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

dispensing optical prescriptions

7 What activities do you think must be restricted to our registrants?

Please provide details.:

ophthalmic consultation including refraction
optical prescribing and dispensing

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

covered in the response to question 7 above

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

"Is there any evidence?" - do you have the meta-analysis? - maybe the question could have been phrased better.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

This question implies that nothing been done about such regulation since you considered the matter nine years ago, which makes me wary to answer the question.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

Such powers (including liaison with NHS inspection) would be so expensive to maintain that, if properly set up, they would cause a significantly lower standard of practice through raising costs to registrants.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

to protect the public from lowering standards of sight-care

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

advantages - unclear

disadvantages - less sight nationally

impacts - my [redacted] driver is less likely to find me, my pilot is less likely to see the runway, GOC loses credibility, freelance journalists get work....

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

I haven't found any.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Disadvantages: the legislation includes the term "sight test" which lowers standards of care.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

It's not to hand but I'm sure we could both find it.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

This is another question that seems halfbaked. What evidence could there be to support something that's been illegal in the UK for over a century?

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

My ex-wife was once an unregistered fitter of contact lenses and the practice closed.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages - protection of the public

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

Asking for reasons for "no" is like asking to explain the non-existence of any non-existent thing.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

It would depend on what change were proposed.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

as 25 above

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

There can be no advantages for anyone who values eyesight more than pennies.

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

None of this matters with internet purchase from outside the UK.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

It could signal open season against eyes.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Public safety

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages would include that the GOC appears to value its public-safety role.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Consumers have a right to trust standards of prescribed optical appliances.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

see above

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages - none

Disadvantages - reduction of sight and of value of GOC

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

see above

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

This question is epistemologically unsound.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The question cannot be answered as it does not distinguish between sports specs being machine-vended or being prescribed and dispensed by a GOC registrant.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

My grandchildren's safety makes me wary of such unreasoned speculation.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The case for change has not been made.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

After fifty years' full-time optometry I am certain that I do.

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Critical appraisal of the research into the impacts by remote care gives no conclusion. However, your question is unfortunately rendered meaningless by its use of the expression "technology or remote care".

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The Act preceded the commercial supply of instruments containing microprocessors.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Be aware of the harm that remote care would create.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

Online sales present risks and benefits to society. The GOC would be concerned with the risks rather than the benefits.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

No because, although the GOC should express its public-safety role, part of the online world is outside the GOC's control and I don't understand about that as well as you do.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The concept known as "sight test" is irrelevant, incorrect and harmful. It should be dropped.

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Shouldn't be allowed to dispense to u16 or partially sighted/blind
Shouldn't be allowed to distribute or dispense CLs

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Only registrants should be able to do above

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

No advantage

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

No, it shouldn't be deregulated any further. It is already a struggle for us to be seen as professionals

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

It shouldn't change from what it is, already too deregulated. More deregulated compared to the USA and most of Europe

7 What activities do you think must be restricted to our registrants?

Please provide details.:

It shouldn't change from what it is, already too deregulated. More deregulated compared to the USA and most of Europe

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

People who don't achieve a particular visual Acuity, those requiring prisms etc. Those with more complex issues such as those who don't have binocular vision

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

What is the point if these are not accredited, anything could be taught

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

No

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Puts the public at risk

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

The public would be at risk. Their eye health would not be considered, it would undermine an already undervalued profession

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

The refraction and eye health check are inherently linked

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Yes

If yes, please provide details of the evidence and where it can be obtained.:

In our practice it can be as high as 20%

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Already too deregulated

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Those not achieving a certain va

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

Already too deregulated

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Already too deregulated, risk to the patient

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Fine as is or rather too deregulated

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Risk to patient

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

They are vulnerable, need skilled professionals to fit

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

Already too deregulated

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

These are often made incorrectly with averages or people taking their own measurements. Online should be more regulated

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

May as well not bother being a DO anymore wages dropped anyone can do our job is what seems to be the thinking now

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Same as now!!

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Same as now!

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

There is so much more to a sight test than just the refraction. I've referred px's for skin lesions which have been cancerous.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

They should not do any aspect of the sight test.....especially re eye health.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

All aspects of the sight test and contact lens fitting should be done by a registered practitioner.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

No....just all of the above.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

CET and CPD is important in keeping our knowledge and skills up to date.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

It is a disadvantage to optometrists if sight tests are deregulated. We build up a rapport with pxs....and are more able to manage their needs and expectations....and monitor their eye health.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Online sales of optical appliances and contact lenses need to be regulated. I've had a px who bought contact lenses online with no prior fitting etc. She had serious corneal oedema from ill fitting contact lenses.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

There is so much more to eye health than just the refraction. Skin cancers, px's emotional well being, eye health etc. are likely to be overlooked/neglected in just a refraction.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Px's may come in complaining of decreased vx and given spectacles when there could be a more serious reason for there drop in vx. Conditions like glaucoma, diabetic retinopathy, high blood pressure, cataracts, etc will be missed in just a refraction.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Sight testing should be carried out by qualified professionals.

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It should remain as is as optometrists have studied to obtain our degree and still have the responsibility of the px's eye health....but we won't benefit from the sales of spex!

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

No....but I would guess at about 30%....if not moreas we have a very elderly px base.

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

CLS should only be fitted and supplied by a qualified professional.

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

I had a px with severe corneal oedema from ill fitting lenses that she bought online without having had a fitting done!!! There should be regulations preventing this from happening.

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

I think more should be done to prevent online purchases of CLS from unregulated sources! Our skills are being devalued! We also need the income from sales of CLS.

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

The fit of CLS is so important in successful and safe CLS wear. Corneal oedema/scarring, neovascularisation, etc can occur from poor lens fitting. This will only be picked up at an aftercare appointment.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantage of having this would prevent unregulated sources from supplying lenses to px's who haven't had a proper CLS fitting.

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

There should be a stipulation of at least an annual aftercare appointment before further CLS can be supplied to the px.

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

The fit of the CLS is most important!

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Zero power lenses are fine to supply providing it's fitted properly

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

If there are frequent changes in Rx eg with uncontrolled diabetes....this won't be picked up if spex are purchased online. The buck will be passed from the S/T practitioner and the appliance supplier.

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The disadvantage would be that the px's Rx might have changed and they may no longer be legal to drive or their cataracts may be refractable.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It should remain as is so that the eye health and vision of a px can be checked. The px is seen as a whole.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

If the Rx and fitting of a high Rx is not correct....it can affect the px's sight and comfort.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It's good as is as it's regulated and there's accountability.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

It's good as is so there is safety and accountability as we are a regulated profession.

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

I think it would be mainly positive especially for those px's unable/unwilling to come in to the practice.....as they would still have access to care.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

There doesn't appear to be any consequence to the unregulated suppliers of optical appliances and the GOC needs to help protect our livelihood as the optical profession.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

I don't know what options there are.

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Education provider

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

The current legislation does cover what should be restricted and the next few questions will add what should be restricted to registrants.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Everything currently in the Optician's Act plus can the dispensing & collection of optical appliances for patients with learning difficulties as well as patients with high (+/- 5.00DS) or complex prescriptions should be restricted to registrants.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

I cannot add an image to this form but there is a photograph of a sign outside a pharmacy stating their pharmacists are available to assess and treat conjunctivitis for £10 (conjunctivitis was misspelled). If possible, can the diagnosis and treatment of anterior eye conditions be restricted to healthcare professionals who have the equipment to safely investigate the patient's eyes before offering a diagnosis and treatment.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

CQC model as that is used for Dentists and GP practices.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

No advantages - the sight test offers a holistic approach towards patient care and is an ideal opportunity for health screening to reduce preventable vision loss from slow progressing conditions such as Glaucoma.

Plus, can the legislation be updated to state Eye Examination rather than Sight Test to properly reflect the care optometrists undertaken when performing what is currently termed as 'Sight Test'.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

There is no published data but speaking to colleagues in Europe and the World, in some countries where the refraction is separated from eye health check part, patients have to have a statement to say that they have had the health checked before the refraction can take place.

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Patients with learning difficulties and those with high prescriptions where a change in back vertex distance would require a slight adjustment to the prescription that needs to be ordered. Dispensing of complex prescriptions needs to be restricted.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The advantage would be less complaints as well as less remakes.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

No

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

Zero powered contact lenses still need to be fitted and supplied by a registrant with the appropriate qualifications. We cannot provide data but everyone on the academic team had cases where young adults have bought cosmetic lenses and attended the optical practice as they could not remove the lenses or had ended damaging the cornea. Some zero powered lenses are used as bandage lenses and for patients who have to use a bandage lens, their anterior eye is already at risk of damage and need quality care to ensure that further damage does not occur. By deregulating zero powered lenses, you put these patients who need bandage lenses at risk.

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

The Yes - a mainly positive impact is for increased use of technology rather than for remote care.

We think that these are two separate issues and need to be considered under their own merit rather than combined.

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

In terms of use of technology, the current regulations will not provide barriers or restrict innovative care.

In terms of remote care, new/different regulations will be needed to ensure patient safety.

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

In terms of remote care - there is very little evidence around this area in eyecare so clearly defined scope of practice underpinned with regulations is needed.

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

remote care: regulations need to centre around the patient care and safety. What does remote care add to the current way eye examinations are carried out? Consideration needs to be given to the registrants engaged in providing remote care, are they under pressure to review a lot more patients compared to when they are carrying out face to face appointments?

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

The verification of dispensing measurement by a registrant is missing. Currently patients can take their own measurements and submit them online and this can create errors in the spectacles that the patient receives meaning that patient cannot use them safely.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

The verification of dispensing measurement by a registrant is missing. Currently patients can take their own measurements and submit them online and this can create errors in the spectacles that the patient receives meaning that patient cannot use them safely

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Changing the term Sight Test to Eye Examination.

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

In addition to the current restrictions, the dispensing and collections for patients with learning difficulties and high + complex prescriptions. Selling of contact lenses (even zero-powered).

7 What activities do you think must be restricted to our registrants?

Please provide details.:

A full eye exam, contact lens fitting and aftercare. Assessment of eye health - anterior and posterior. Dispensing of spectacles, low vision aids for all vulnerable patients and patients with high/complex prescriptions.

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

assessment of anterior eye conditions as other healthcare professionals such as pharmacists/ GPs/ nurses do not have the correct equipment to differentiate between the red-eye related conditions.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

No

Please give your reasons and provide any evidence to support these.:

None of the other regulators accredit or approve post-registration skills.

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Especially around the supervision arrangements for optical trainees.

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

Similar to CQC could be considered as Dentists and GP practices are CQC registered so having a similar model could be beneficial for public protection.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Many patient may come in because their vision may have changed but by completing a full sight test, eye diseases which progress gradually can be detected. The sight test is not just for issuing a spectacle prescription but it is an excellent health screening tool and by separating the refraction from eye health assessment, we will not be protecting the public from preventable sight loss.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

patients with learning difficulties and those with high/complex prescriptions.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

As these groups of patients mentioned in Q23 may have complex needs, by getting a registrant to undertake the dispense and collection, you can ensure that the patients are fully covered.

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

By removing the requirement to verify a copy of the CL specification, there will be increased risk of harm to patients as they may not remember all the CL specification and be issued with inappropriate or poor fitting CL's.

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Some zero powered lenses are used as bandage lenses and patients wearing these need careful monitoring. It would be difficult to state that any lens used as a bandage lens needs to be issued by a registrant or other zero-powered CL's can be sold without any checks or fitting appointment.

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

patients would end up wearing spectacles which are not correct for their current need.

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

it ensures that patients have a regular sight test and that they are wearing the correct prescription for their needs.

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

By ensuring the legislation remains, the registrant can ensure that the fitting of the sportswear and purpose is correct for what the patient needs.

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

The use of technology can be embedded within the current provision of eye care/sight test but the term remote care is very different to technology. There should different legislation related to remote care.

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

There is no verification that measurements for dispensing have been taken by a registrant as there many patients who take the measurements themselves which end up with spectacles that they cannot use.

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Yes

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Supervision of trainees and how employers can support supervisors so that they can train the future workforce safely without the commercial pressures of selling/productivity, etc.

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Optometrist

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not sure / no opinion

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction and ophthalmoscopy/eye health checks and contact lens fitting and after care

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction and eye health checks, the health of the eye/pathology directly impacts on Refraction and should not be separated.
Contact Lens fitting and aftercares

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

N/A

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

No

Please give your reasons and provide any evidence to support these.:

Ocular health and binocular issues directly impact refraction.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Optometrist's jobs/roles would be less, driving down our pay and more competition for reduced jobs. Not all Optometrists want to take higher education e.g. IP, med ret etc

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

The whole refraction and eye health check is completed by one practitioner who has the full details of the patient.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

Wrong appliance could be given by mistake and causes ocular damage.
The business could get sued.

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

An aftercare should be seen in person by a registered Optom/CLO or preregistration optom/CLO under supervision of a registered optom or CLO. Including health check of the eye, check the fitting of the lenses, refraction and appropriate advice

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

Ensuring people are not buying inferior products which could damage the health of their eyes.

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

Buying inferior products which could damage the health of their eyes.

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly negative impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Sight testing fitting contact lenses and optical appliances

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Sight tests fitting contact lenses and dispensing spectacles of any type

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

Dispensing spectacles

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

If you make dispensing opticians refractionists then a proper course with accreditation is needed and proper remuneration for the extra work and responsibility

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Yes, the GPhC model of a responsible pharmacist

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

Dispensing opticians are healthcare professionals in their own right and are capable of refraction techniques if trained comprehensively to do this. Like any newly qualified doctor or optometrist it should be given to discuss or have help from an optometrist buddy and likewise if an optometrist needs help with CLS then I am more than happy to help it's a 2way good working relationship thing

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Would really change optics

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Keep optics stable poss optometrists may not like and would seek another career

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Leave legislation alone as protects illegal supply of contact lenses

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

[redacted]

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

No impact as no other profession has none qualified staff doing what opticians do eg you wouldn't expect the receptionist in the dentist to do your filling

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Could get the wrong specifications and danger to patient leave it alone

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

Not only the usual health lifestyle questions and comfort wearing times etc and examination of the fit lids lashes eversion and use of fluorescein but also the mental and physical ability of patient and how they conduct themselves

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

No Aftercare's and what not to do with contact lenses and bad handling skills

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Health issues a sight test is a health check and not just retail also if the prescription is not right the consumer will have spent money and they will not be happy if not correct

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Leave as is it works as now and a lowering of standards is not good

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantages is consumer convenience but at the cost of maybe wearing incorrectly dispensed ocs etc

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None it works

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

None it works as it is

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

In contact lenses instillation of [redacted] and lid eversion and slit lamp examination very difficult

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Yes

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

No evidence but I have seen patients wearing coloured lenses 14hrs a day 7days a week with no sight test or contact lens aftercare and very lenses swapped for hydrogel ones I can't give evidence but that is in my years of experience

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

Put in place that these so called companies need to have up today's sight test and contact lens prescriptions before selling and no swaps either for the gratification of profits

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Other - please specify

If 'other', please specify.:

We are a defence association and Union representing in excess of 34,000 registered pharmacists.

4 Are you responding on behalf of an organisation?

Yes

Name of organisation:

[redacted]

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

No

If no, please provide details.:

The [redacted] is concerned that the Department of Health and Social Care (DHSC) is "offering the opportunity" to the GOC around changes to its regulatory powers whilst there is a substantial overarching review around all 10 UK healthcare regulators. We are also concerned that this may be an opportunistic attempt to make changes to regulatory powers that focus on, in the words of the consultation "unnecessary restrictions" or "not unnecessarily restrict competition in the market" or "changes do not impose disproportionate administrative or financial impacts".

There has been similar terminology recently used by the DHSC, where it explicitly imposed a new duty on the General Pharmaceutical Council (GPhC) in the recent "The Pharmacy (Responsible Pharmacists, Superintendent Pharmacists etc.) Order 2022":

"These powers are qualified by a new duty to have regard to the principle that the burdens imposed on businesses by rules or regulations are the minimum necessary... "

Reference : The Pharmacy (Responsible Pharmacists, Superintendent Pharmacists etc.) Order 2022 (legislation.gov.uk)

The GOC should be mindful that the DHSC may seek to impose a duty to take into account business interests especially as it is, unlike the GPhC, tasked with the regulation of businesses (as distinct to premises).

In its 2013 outcome review of business regulation, the GOC published some of the comments received during that consultation. One such comment, by a practising optometrist gives a graphic illustration of poor business practice that they had experienced and which did not appear to be in isolation;

"I would like to share some of my personal experiences as a Locum. I have been told on many occasions that I am 'here to sell' by lay managers.

My work is judged on daily basis, purely according to how much money is made from the clinic. Little to no interest is given to the standard of clinical work which has been carried out. If the daily target is not met, the ability of the optometrist is routinely questioned by lay managers. Another example is placing optometrists on daily league tables with conversion rates against their names.... which all of the staff can view at their leisure.

This business tactic encourages optometrists to compete with each other and to over prescribe for fear of feeling like a failure in the eyes of the practice. This is unethical and I do not feel it is helpful in maintaining high clinical standards for patients.

Practices which offer free eye tests and very cheap glasses rely on a high volume of patients. In order to maximise the number of patients in each clinic, 10 minute contact lens appointments are booked in as opposed to 20 minute slots. Dilation appointments don't allow for separate pre- drops /post drops slot but just a single 10 minute appointment.

Lay managers encourage optometrists to see patients who are late to maximise profits... never mind that by rushing the optometrist, something serious could be missed. Supervised kids collections are booked in at the same time as sight tests so in effect, the optometrist is expected to be in two place at once.

Again, if an optometrist opposes these things, they are made to feel as if they are hurting the business and are quickly replaced by Locums that do not speak out.

These are just some examples of optometry in the UK today. I was greatly encouraged by this consultation as it may bring about change. I sincerely hope that change does come about, for the sake of both optometrists and patients."

Reference

https://webarchive.nationalarchives.gov.uk/ukgwa/20200701120947mp_/https://www.optical.org/download.cfm?docid=D7E8A62C-9210-4AFC-BCC21B25E3A5D0D0

The 2013 consultation did not lead to the legislative changes hoped for by this GOC optometrist, around the regulation of businesses commissioned to provide healthcare . The behaviour detailed in the account by this optometrist is likely to be ongoing .

The implicit role of a healthcare regulator is to protect the public. It is NOT to take into account any potential burden that appropriate regulatory activity imposes on a business undertaking a regulated activity. It is not disputed that that reform is needed – but these reforms need to be patient focussed and fit for purpose, addressing some of the behaviours and poor practice uncovered in the 2013 review.

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

no comment

7 What activities do you think must be restricted to our registrants?

Please provide details.:

no comment

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Not sure / no opinion

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Not sure / no opinion

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Not sure / no opinion

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Not sure / no opinion

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

no comment

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not Answered

Please give your reasons and provide any evidence to support these.:

no comment

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

The basis for extension of business regulation outlined in 2013 absolutely still applies. There is no evidence of behaviour change from some businesses observed by Europe Economics in its report to Council :

“ there was evidence of poor business practice that could pose a risk to public health and safety.”

Reference :

https://webarchive.nationalarchives.gov.uk/ukgwa/20200701120947mp_/https://www.optical.org/download.cfm?docid=D7E8A62C-9210-4AFC-BCC21B25E3A5D0D0

From the evidence, it is not clear why the DHSC did not progress the matter in the 9 intervening years but is now “offering the opportunity” to the GOC at a point when there is a substantial and overarching review of the whole UK healthcare regulatory landscape.

Following the 2013 review of options for business regulation, the GOC stated that Option 4 (Extend business registration and enhance code of conduct) was its preferred option. However, option 4 does not include a power of inspection or an audit of protocols (please also see our response to Q13)

We make the following observations:

1. Changes to the requirements in the management structure of bodies corporate MUST ensure that the professional registrant directors form the at least 50% of the board. This would still allow a husband/wife small practice to operate (using a registered company mechanism) even if only one director was a professional registrant. Having such a structure, with such a level of registrant representation, may help to prevent, especially in larger body corporates, the types of behaviours uncovered by the 2013 review.

2. For business regulation to be effective it needs proper powers of sanction to ensure that there is a clear understanding that poor behaviours will lead to the ultimate penalty of erasure of the provider (body corporate) from the register. This power of erasure already exists for individual registrants and this should be extended to business registrants in the interest of balance and proportionality in respect of their responsibilities in the provision of a service.

Appropriate drafting of legislation would ensure that the NHS could take back the contract of any business erased by the healthcare regulator on the grounds of not meeting standards and allow the contract to be put out to tender to any alternative, suitably qualified provider.

The public would thus not lose access to services – they would probably gain access to better quality and more professional services delivered with proper professional oversight and professional considerations as the introduction of such measures should have the effect of driving up quality and a maintenance of agreed standards.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Yes

Please give your reasons and provide any evidence to support these.:

The primary and foremost role of a healthcare regulator is to protect the public. The case for extending business regulation was already made in 2013.

We do not consider it to be valid, for a healthcare regulator charged with protecting the public, to have to consider or take into account the financial impact of any justified and necessary regulatory obligations imposed on business registrants.

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

Within Option 5 of the 2013 review there was a proposed power of inspection and an audit of protocols which we consider to be the better option in terms of proportionate public protection rather than Option 4, which was around extending business registration and enhancing the code of conduct but without inspection and audit.

GP premises, dental premises and pharmacy premises are all subject to regulatory inspections. We are concerned that the GOC proposals would somehow exclude the need for inspections for premises providing ophthalmic services, especially in light of the example of poor behaviours demonstrated by the 2013 review.

There are a number of issues that the GOC may wish to consider:

1. The mechanisms by which it will enforce the extension of business registration and the monitoring of the enhanced code of conduct to eliminate the poor behaviours that have already been accepted as existing if it does not have the powers of inspection or a right to audit.

2. Whether it should set up an in-house inspectorate or, whether it should agree terms with the CQC for it to provide an inspection service. The wording of any legislation must be clear as to allow this option were the GOC minded to follow this route.

Premises Inspections, when conducted properly and with diligence, will take time and expertise to fully understand the overarching operations within those premises. To ensure consistency with dental and medical services and to benefit from the considerable existing expertise, premises that deliver NHS ophthalmic services should also be inspected by the CQC.

This would also allay the fear of duplication of inspections (the example of GPs or ophthalmologists providing restricted services) as discussed in the 2013 review.

3. The 2013 review discovered widespread disparity and inconsistency in the inspection regimes operated at a local level by NHS bodies. The role of inspection by the NHS bodies for the purpose of contract monitoring is wholly different to that which would be undertaken by the GOC as a healthcare regulator.

There should be a formal documented process and requirement to publish inspection reports, to ensure transparency and sharing of information between the healthcare regulator and the NHS contracting entity that also inspects optician premises. This would reduce the "burden" on business that the GOC is clearly so concerned about.

Please also see our answer to question 11 for a fuller context.

14 Is there an alternative model of business regulation that we should consider?

Yes, another model (please specify)

Please give your reasons and provide any evidence to support these.:

Option 5, as described in the 2013 review would be a better option than the GOC preferred Option 4.

In terms of the GPhC model of the Responsible Pharmacist (RP), this model has proven not to be fit for purpose.

Retail pharmacies (termed community pharmacies) are dominated by large corporate chains with at least ten UK chains controlling more than one hundred premises each and two 'mega-chains' controlling in excess of one thousand premises each.

There have been significant issues around governance and the manner in which power and control is exerted on the professional activities which occur within these community pharmacy premises. In every instance it is the individual RP that is held to account for any resultant failings rather than the bodies corporate.

The RP system has failed the public and has failed the pharmacy profession.

We were therefore unsurprised that in the GOC 2013 consultation, a submission by a large retail chain of opticians advocated the adoption of the same RP model for optometry.

"These two concepts work very well in pharmacy and I believe we could potentially adopt & adapt them into optometry. (Large chain of opticians 2)"

Reference:

https://webarchive.nationalarchives.gov.uk/ukgwa/20200701120947mp_/https://www.optical.org/download.cfm?docid=D7E8A62C-9210-4AFC-BCC21B25E3A5D0D

We strongly advocate the GOC to disregard the RP model as being, even remotely or with adaptation, suitable for optometry premises and businesses.

We have evidence of shocking examples of target setting, bullying and premises being operated with inadequately trained staff or without any support staff at all. The RP, sometimes a locum, would have little or zero ability to influence the Standard Operating Procedures, the adequate staffing or the overarching governance framework within that pharmacy. However, that RP is still liable for any errors or omissions that occur within that pharmacy and especially if a patient complaint ensues.

The RP model of regulation has also failed in that not a single business has been subject to any fitness to practice proceedings by the pharmacy regulator, despite widespread evidence of wholesale abuse of the RP regulations by certain chains.

One recent example has been of certain chains attempting to operate pharmacy premises, bypassing both legal and professional obligations, by coercing pharmacists to supervise more than one premises.

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

Our overarching view is that the GOC must effectively engage and consult with professional registrants (as opposed to business registrants). It should do this for the refraction test and all the subsequent questions relating to professional activities and their scope and delivery.

It should not seek to impose its view or the view of Government (exercised via the DHSC) into changes that their professional registrants, and especially

their optometrist registrants, do not endorse.

The preamble to Question 17 already acknowledges the issue for the public in distinguishing between a simple sight test and a comprehensive eye health check

“The difference between these two areas is not always clearly understood by patients”

It is incumbent on the GOC to ensure that patients are clear about the service they receive and its proper context – and that the decision on how services are delivered should always be made by an optometrist.

Our overarching comment on the remaining questions around professional activities that may or may not be undertaken is that the role of the GOC is to support healthcare professionals in delivering professional healthcare services safely.

The healthcare professionals are the qualified experts – and they carry the responsibility of professional regulation. If their views and concerns around activities that, if left unchecked, could adversely impact patients and lead to harm. Therefore, their views and concerns must be listened to and acted upon.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

no comment

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

no comment

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no comment

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

no comment

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not sure / no opinion

If yes, please provide details of the evidence and where it can be obtained.:

no comment

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

no comment

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no comment

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Not sure / no opinion

Please explain which group(s), give your reasons and provide any evidence to support these.:

no comment

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no comment

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

no comment

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

no comment

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

no comment

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no comment

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

no comment

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

no comment

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

no comment

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

no comment

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no comment

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

no comment

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

no comment

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

no comment

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

no comment

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no comment

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no comment

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

no comment

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no comment

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no comment

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

no comment

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

no comment

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

no comment

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

no comment

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

no comment

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

no comment

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

no comment

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

no comment

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

no comment

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

no comment

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

no comment

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

no comment

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

no comment

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Contact lens optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Not Answered

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

testing sight

fitting contact lenses

selling optical appliance to children under 16, to sell to visual impaired ,sell of plano lenses

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:

highly-developed communication skills,

expert dispensing skills, taking into account factors such as facial characteristics and posture

an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour

an ability to judge the decision-making capacity of a patient

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

is long-term and potentially expensive

has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia

may be of value to patients who are over 16, as well as to children.

7 What activities do you think must be restricted to our registrants?

Please provide details.:

testing sight

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear

selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

The GOC should take account of developments in practice that have occurred since the legislation was last reviewed and restrict the following activities to GOC registrants only:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:

highly-developed communication skills,

expert dispensing skills, taking into account factors such as facial characteristics and posture

an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour

an ability to judge the decision-making capacity of a patient

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

is long-term and potentially expensive

has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia

may be of value to patients who are over 16, as well as to children.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Yes

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

Yes, there should be a consistent approach to business regulation, recognising that some activities are within the control of businesses as opposed to individual registrants, such as ensuring that:

there is the right balance between clinical and commercial incentives

there are appropriate standard operating procedures

equipment is maintained correctly and staff are properly trained to use it

All businesses carrying out restricted activities should be required to register with the GOC and comply with its business standards

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Not Answered

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

No, when the GOC considered this question in 2013 it concluded that the risks associated with business practices did not warrant an inspection regime. Since then, the GOC has strengthened the system of business regulation by introducing more comprehensive business standards that make clearer its expectations.

In the absence of evidence that the risks associated with business practices have increased and analysis showing that it is necessary and proportionate to introduce an inspection regime, the case for doing so has not been made.

As a general rule, the GOC should think very carefully before increasing the costs of regulation and these will ultimately be passed on to patients

14 Is there an alternative model of business regulation that we should consider?

Not Answered

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

dispensing opticians should be able to undertake refraction for the purposes of the sight test, subject to the stated conditions. Therefore, the GOC should amend its 2013 statement on sight-testing to enable this to happen

We also recognise that refraction by dispensing opticians for the purposes of the sight test should be under the oversight of an optometrist or medical practitioner so that patients will continue to benefit from an eye health examination in conjunction with a refraction. This is a major strength of the UK's system of eye care and enables eye and wider health issues to be identified and addressed at an early stage in line with the wider health policy focus on prevention.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Enabling dispensing opticians to refract as part of the sight test under the oversight of an optometrist or medical practitioner would be a limited change to the GOC's 2013 statement on sight-testing. What is often overlooked is that this statement already allows dispensing opticians to refract outside of the sight test, e.g. to check a prescription.

The training needed to enable dispensing opticians to carry out refraction as part of the sight test would also be limited. They already learn about refraction as part of their initial education and [redacted] could provide additional training so members' skills and knowledge are up-to-date. The GOC's new outcomes for registration will ensure that future DOs are fully versed in refraction from the outset.

Enabling dispensing opticians to support optometrists and medical practitioners in carrying out sight tests would enable patient care to be provided in a more flexible way while upholding the principle that a sight test should involve both a refraction and an eye health examination.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not Answered

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

Not Answered

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Yes, the sale and supply of optical appliances to certain groups of vulnerable patients should be further restricted so that it must be carried out by a registrant. Such patient groups should include people with learning disabilities or dementia because dispensing optical appliances to such patients requires enhanced skills and knowledge.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing optical appliances to people with learning disabilities or dementia requires enhanced skills and knowledge, including:
highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
understanding of medical conditions

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

risks higher for infection with sight threatening

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

its important that the verification of contact lens specification is provided by qualified person

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

in correct lenses can cause damage to px eye health

29 Do you think the Act should specify a definition of aftercare?

Yes

If yes, please specify what you think the definition of aftercare should be.:

aftercare date will provide with less contact lens infections and long term problems

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

long term damage to cornea will not be detected

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

consumers will not go for health check eye health check

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No, the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 does not create any unnecessary regulatory barriers.

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These restrictions are necessary to protect the public and should be maintained. We do not agree that the fitting process for such sportswear is 'not as complex' as for spectacles or contact lenses. Sports eyewear is fitted not only to ensure optimum vision but to afford protection to the wearer. Therefore, it is more rather than less complex to fit, requiring detailed questioning about usage and enhanced dispensing skills to ensure a safe, optimum fit.

The call for evidence also suggests that the restrictions might be unnecessary because sportswear is 'usually only worn for short periods'. While diving masks, swimming goggles or sport goggles can be worn for short periods, they can also be worn over an extended length of time. In any case, if such optical appliances have not been fitted correctly and/or appropriate advice has not been given, there is clearly an increased risk of harm if a child is unable to see clearly under water or is wearing a poorly fitting pair of rugby goggles. This could also result in harm to team members or competitors

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Yes – a mainly positive impact

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

triage would give you a better idea on urgency of appointment

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not Answered

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not Answered

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

Refraction

7 What activities do you think must be restricted to our registrants?

Please provide details.:

Refraction

Low vision

Paediatrics

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of
contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical
appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero
powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

No

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

Yes

Please give your reasons and provide any evidence to support these.:

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – under the oversight of an optometrist or registered medical practitioner

Please give your reasons and provide any evidence to support these.:

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

More px to be seen

Links to dispensing

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Advantage- all done in one room.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Allows for tight controlling to protect patients

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

No

Please explain which group(s), give your reasons and provide any evidence to support these.:

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Yes

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Patient health and sight could be comprised

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Yes

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Yes

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Allows the sale of cosmetic lenses to be controlled

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Yes

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

No

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

May not meet standards for driving

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Allows ot to be controlled

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not regulated

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Correct eyewear supplied

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

No

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

No

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

[redacted]

[redacted]

Tell us who you are

[redacted]

3 Which category best describes you?

Dispensing optician

If 'other', please specify.:

4 Are you responding on behalf of an organisation?

No

Name of organisation:

1. Objectives for legislative reform

5 Are these the right objectives for the GOC for legislative reform?

Yes

If no, please provide details.:

2. Protection of title, restricted activities and registers

6 What activities should non-registrants be restricted/prevented from doing?

Please provide details.:

overarching need to protect the public makes it necessary to continue to prevent non-registrants:

testing sight

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear

selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

In addition, the GOC should take account of developments in practice that have occurred since the legislation was last reviewed and prevent non-registrants from carrying out the following activities either directly or under supervision:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:

highly-developed communication skills,

expert dispensing skills, taking into account factors such as facial characteristics and posture

an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour

an ability to judge the decision-making capacity of a patient

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

is long-term and potentially expensive

has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia

7 What activities do you think must be restricted to our registrants?

Please provide details.:

In order to protect the public, the following activities must be restricted to registrants:

testing sight

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear
selling optical appliances to people registered as visually impaired
selling zero-powered contact lenses
dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia
giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses

8 What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Testing of sight:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Fitting of contact lenses:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling optical appliances to children under 16 and those registered visually impaired:
Should be restricted

You do not need to provide detailed reasoning or evidence at this stage as we will ask you for further information in the sections below. - Selling zero powered contact lenses:
Should be restricted

9 Are there any additional activities that you think should be restricted to registrants?

Please provide details.:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:
highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:
is long-term and potentially expensive
has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia
may be of value to patients who are over 16, as well as to children.

10 Is there any evidence that any other post-registration skills, qualifications or training need to be accredited or approved by the GOC (above and beyond the existing contact lens optician and prescribing qualifications)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

3. Regulation of businesses

11 Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes

Please give your reasons and provide any evidence to support these.:

Urgent - act now to respond to the
GOC consultation on the Opticians Act
Respond by 18 July

Last week we let you know about some of the key issues for dispensing opticians and contact lens opticians within the GOC consultation on their 2013 statement and the Opticians Act.

Thank you to all who have responded. If you have not yet completed the online form, we strongly encourage you to do so by 18 July when the consultation closes.

While [redacted] is responding to all 55 questions, you don't have to answer every one. The ones that we recommend focusing on are listed below with the points we will be making in the [redacted] response.

We hope you find this guidance helpful and if you have any specific questions please email [redacted] :

Restriction of activities

Refraction

Restrcting the sale of optical appliances

Supply of sports eyewear to under 16s

Regulating businesses

Restriction of activities

Consultation question 6. What activities should non-registrants be restricted/ prevented from doing?

[redacted] view is that the overarching need to protect the public makes it necessary to continue to prevent non-registrants:

testing sight

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear

selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

In addition, the GOC should take account of developments in practice that have occurred since the legislation was last reviewed and prevent non-registrants from carrying out the following activities either directly or under supervision:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:

highly-developed communication skills,

expert dispensing skills, taking into account factors such as facial characteristics and posture

an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour

an ability to judge the decision-making capacity of a patient

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

is long-term and potentially expensive

has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia

may be of value to patients who are over 16, as well as to children.

Recognising that legislative change could take some time, the GOC should review its standards of practice and standards for registered businesses to make clear what constitutes good practice for the benefit of patients.

Consultation question 7. What activities do you think must be restricted to our registrants?

In order to protect the public, the following activities must be restricted to registrants:

testing sight

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear

selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses

For more details, see answer to question 6.

Consultation question 8. What are your views about continuing to restrict/prevent non-registrants from carrying out the following activities?

All the following activities should continue to be restricted:

testing sight

fitting contact lenses

selling optical appliances to children under 16, including sports eyewear

selling optical appliances to people registered as visually impaired

selling zero-powered contact lenses

Consultation question 9. Are there any additional activities that you think should be restricted to registrants?

The GOC should take account of developments in practice that have occurred since the legislation was last reviewed and restrict the following activities to GOC registrants only:

dispensing optical appliances to patient groups that can be described as vulnerable, such as people with learning disabilities or dementia, recognising that this requires enhanced skills and knowledge, including:

highly-developed communication skills,

expert dispensing skills, taking into account factors such as facial characteristics and posture

an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour

an ability to judge the decision-making capacity of a patient

giving advice on and treatment for myopia management, including through the fitting and supply of spectacles and contact lenses, recognising that treatment for myopia management:

is long-term and potentially expensive

has the potential to reduce the risk of eye disease later in life, as well as slowing the development of myopia

may be of value to patients who are over 16, as well as to children.

Find out more and respond here

Refraction

Consultation question 15. Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

The GOC states in the call for evidence that, "dispensing opticians could undertake refraction for the purposes of the sight test if they are appropriately trained, competent, overseen and indemnified." They go on to say that this would be possible only if they were to amend or remove its 2013 policy statement on refraction.

[redacted] supports the GOC's view that dispensing opticians should be able to undertake refraction for the purposes of the sight test, subject to the stated conditions. Therefore, the GOC should amend its 2013 statement on sight-testing to enable this to happen.

We also recognise that refraction by dispensing opticians for the purposes of the sight test should be under the oversight of an optometrist or medical practitioner so that patients will continue to benefit from an eye health examination in conjunction with a refraction. This is a major strength of the UK's system of eye care and enables eye and wider health issues to be identified and addressed at an early stage in line with the wider health policy focus on prevention.

Consultation question 16. What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Enabling dispensing opticians to refract as part of the sight test under the oversight of an optometrist or medical practitioner would be a limited change to the GOC's 2013 statement on sight-testing. What is often overlooked is that this statement already allows dispensing opticians to refract outside of the sight test, e.g. to check a prescription.

The training needed to enable dispensing opticians to carry out refraction as part of the sight test would also be limited. They already learn about refraction as part of their initial education and [redacted] would provide additional training so members' skills and knowledge are up-to-date. The GOC's new outcomes for registration will ensure that future DOs are fully versed in refraction from the outset.

Enabling dispensing opticians to support optometrists and medical practitioners in carrying out sight tests would enable patient care to be provided in a more flexible way while upholding the principle that a sight test should involve both a refraction and an eye health examination.

Discover the GOC call for evidence here

Restricting the sale of optical appliances

Consultation question 23. Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes, the sale and supply of optical appliances to certain groups of vulnerable patients should be further restricted so that it must be carried out by a registrant. Such patient groups should include people with learning disabilities or dementia because dispensing optical appliances to such patients requires enhanced skills and knowledge.

Consultation question 24. If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Dispensing optical appliances to people with learning disabilities or dementia requires enhanced skills and knowledge, including:

highly-developed communication skills,

expert dispensing skills, taking into account factors such as facial characteristics and posture

an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour

an ability to judge the decision-making capacity of a patient

understanding of medical conditions

Learn more about the consultation here

Supply of sports eyewear to under 16s

Consultation question 40. Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No, the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 does not create any unnecessary regulatory barriers.

Consultation question 41. What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

These restrictions are necessary to protect the public and should be maintained. We do not agree that the fitting process for such sportswear is 'not as complex' as for spectacles or contact lenses. Sports eyewear is fitted not only to ensure optimum vision but to afford protection to the wearer. Therefore, it is more rather than less complex to fit, requiring detailed questioning about usage and enhanced dispensing skills to ensure a safe, optimum fit.

The call for evidence also suggests that the restrictions might be unnecessary because sportswear is 'usually only worn for short periods'. While diving masks, swimming goggles or sport goggles can be worn for short periods, they can also be worn over an extended length of time. In any case, if such optical appliances have not been fitted correctly and/or appropriate advice has not been given, there is clearly an increased risk of harm if a child is unable to see clearly under water or is wearing a poorly fitting pair of rugby goggles. This could also result in harm to team members or competitors.

Find out more and respond here

Regulating businesses

Consultation question 11. Does the basis for extension of business regulation outlined in our 2013 review of business regulation still apply?

Yes, there should be a consistent approach to business regulation, recognising that some activities are within the control of businesses as opposed to individual registrants, such as ensuring that:

there is the right balance between clinical and commercial incentives

there are appropriate standard operating procedures

equipment is maintained correctly and staff are properly trained to use it

All businesses carrying out restricted activities should be required to register with the GOC and comply with its business standards.

12 Are there any advantages, disadvantages and impacts (both positive and negative) of extending business regulation in addition to those identified in our 2013 review of business regulation? (Impacts can include financial and equality, diversity and inclusion.)

Unsure / no opinion

Please give your reasons and provide any evidence to support these.:

13 Do you think the GOC could more effectively regulate businesses if it had powers of inspection?

No

Please give your reasons and provide any evidence to support these.:

No, when the GOC considered this question in 2013 it concluded that the risks associated with business practices did not warrant an inspection regime. Since then, the GOC has strengthened the system of business regulation by introducing more comprehensive business standards that make clearer its expectations.

In the absence of evidence that the risks associated with business practices have increased and analysis showing that it is necessary and proportionate to introduce an inspection regime, the case for doing so has not been made.

As a general rule, the GOC should think very carefully before increasing the costs of regulation and these will ultimately be passed on to patients.

14 Is there an alternative model of business regulation that we should consider?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

4. Testing of sight

15 Should dispensing opticians be able to undertake refraction for the purposes of the sight test? (NB This would be possible only if the GOC were to amend or remove its 2013 statement on refraction.)

Yes – with no restrictions

Please give your reasons and provide any evidence to support these.:

The GOC states in the call for evidence that, “dispensing opticians could undertake refraction for the purposes of the sight test if they are appropriately trained, competent, overseen and indemnified.” They go on to say that this would be possible only if they were to amend or remove its 2013 policy statement on refraction.

[redacted] supports the GOC’s view that dispensing opticians should be able to undertake refraction for the purposes of the sight test, subject to the stated conditions. Therefore, the GOC should amend its 2013 statement on sight-testing to enable this to happen.

We also recognise that refraction by dispensing opticians for the purposes of the sight test should be under the oversight of an optometrist or medical practitioner so that patients will continue to benefit from an eye health examination in conjunction with a refraction. This is a major strength of the UK’s system of eye care and enables eye and wider health issues to be identified and addressed at an early stage in line with the wider health policy focus on prevention.

16 What would be the advantages, disadvantages and impacts (both positive and negative) of amending or removing our 2013 statement on refraction so that dispensing opticians can refract for the purposes of the sight test? (Impacts can include financial impacts and equality, diversity and inclusion impacts.)

Please give your reasons and provide any evidence to support these.:

Will benefit business and individual positively.

Optometrist could be more focused on other aspects of eye health and more towards mecs and independent prescribing.

17 Does the sight testing legislation create any unnecessary regulatory barriers (not including refraction by dispensing opticians)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

18 What would be the advantages, disadvantages and impacts (both positive and negative) of sight testing legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

With online retail eyewear business it is having a negative financial impact on qualified dispensing opticians. Opticians are using optical assistants who are not providing best service to the public. Whilst there are numerous opportunities to grow academically and clinical responsibilities, DO’s are being left behind.

19 Do you have any data on the number/percentage of referrals that are made to secondary care following a sight test / eye examination?

No

If yes, please provide details of the evidence and where it can be obtained.:

20 Are you aware of any data to support or refute the case for separating the refraction from the eye health check?

No

If yes, please provide details of the evidence and where it can be obtained.:

5. Fitting of contact lenses

21 Does the fitting of contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

22 What would be the advantages, disadvantages and impacts (both positive and negative) of fitting of contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Not sure

6a. Sale and supply of optical appliances - supply to under 16s and those registered visually impaired

23 Should the sale and supply of optical appliances be further restricted to certain groups of vulnerable patients?

Yes – please specify which groups of patients

Please explain which group(s), give your reasons and provide any evidence to support these.:

Yes, the sale and supply of optical appliances to certain groups of vulnerable patients should be further restricted so that it must be carried out by a registrant. Such patient groups should include people with learning disabilities or dementia because dispensing optical appliances to such patients requires enhanced skills and knowledge.

24 If you answered yes to the previous question, what would be the advantages, disadvantages and impacts (both positive and negative) of further restricting the sale and supply of optical appliances to certain groups of vulnerable patients? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

Dispensing optical appliances to people with learning disabilities or dementia requires enhanced skills and knowledge, including:
highly-developed communication skills,
expert dispensing skills, taking into account factors such as facial characteristics and posture
an understanding medical conditions, such as dementia, and the impact they can have on vision and a patient's behaviour
an ability to judge the decision-making capacity of a patient
understanding of medical conditions

6b. Sale and supply of optical appliances - prescription contact lenses and verification

25 Do the general direction / supervision legislative requirements relating to the sale of prescription contact lenses create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

26 Would there be a risk of harm to patients if the general direction / supervision requirements relating to the sale of prescription contact lenses changed?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

27 Do the legislative requirements for verification of contact lens specifications create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

28 What would be the advantages, disadvantages and impacts (both positive and negative) of removing the requirement to verify a copy of or the particulars of a contact lens specification? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

29 Do you think the Act should specify a definition of aftercare?

Not sure / no opinion

If yes, please specify what you think the definition of aftercare should be.:

6c. Sale and supply of optical appliances - zero powered contact lenses

30 Does the zero powered contact lenses legislation create any unnecessary regulatory barriers?

Not sure / no opinion

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

31 Would there be a risk of harm to patients if the requirements relating to the sale of zero powered contact lenses change?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

32 If you answered yes to the previous question, is legislation necessary to mitigate this risk?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

33 What would be the advantages, disadvantages and impacts (both positive and negative) of zero powered contact lenses legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6d. Sale and supply of optical appliances - offences under the Act

34 Are there any unnecessary regulatory barriers in the Act that would prevent current or future development in the sale of optical appliances or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

35 If you answered yes to the previous question, what would be the risk on the consumer if these barriers were removed?

Please give your reasons and provide any evidence to support these. Please also include any advantages, disadvantages and impacts (both positive and negative) of any proposed changes.:

36 Is legislation regarding the sale of optical appliances necessary to protect consumers (except restricted categories)?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

6e. Sale and supply of optical appliances - by non-registrants

37 Is the two year prescription restriction on purchase of spectacles from non-registrants an unnecessary regulatory barrier?

Not sure / no opinion

Please give your reasons and provide any evidence to support these.:

38 What would be advantages, disadvantages and impacts (both positive and negative) of patients being able to purchase spectacles from non-registrants without a prescription dated in the previous two years? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

39 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6f. Sale and supply of optical appliances - sportswear to under 16s

40 Does the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 create any unnecessary regulatory barriers?

No

Please give your reasons and provide any evidence to support these.:

No, the legislation in relation to the sale and supply of sportswear optical appliances for children under 16 does not create any unnecessary regulatory barriers

41 What would be advantages, disadvantages and impacts (both positive and negative) of children under 16 being able to buy sportswear optical appliances outside the supervision of a registrant / registered medical practitioner? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

These restrictions are necessary to protect the public and should be maintained. We do not agree that the fitting process for such sportswear is 'not as complex' as for spectacles or contact lenses. Sports eyewear is fitted not only to ensure optimum vision but to afford protection to the wearer. Therefore, it is more rather than less complex to fit, requiring detailed questioning about usage and enhanced dispensing skills to ensure a safe, optimum fit. The call for evidence also suggests that the restrictions might be unnecessary because sportswear is 'usually only worn for short periods'. While diving masks, swimming goggles or sport goggles can be worn for short periods, they can also be worn over an extended length of time. In any case, if such optical appliances have not been fitted correctly and/or appropriate advice has not been given, there is clearly an increased risk of harm if a child is unable to see clearly under water or is wearing a poorly fitting pair of rugby goggles. This could also result in harm to team members or competitors.

42 What would be advantages, disadvantages and impacts (both positive and negative) of the legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

6g. Sale and supply of optical appliances - other

43 Are there any other aspects of the sale and supply of optical appliances legislation that you think need changing or create unnecessary regulatory barriers?

Not sure / no opinion

If yes, please give your reasons and provide any evidence to support these.:

44 What would be the advantages, disadvantages and impacts (both positive and negative) of the sale and supply of optical appliances legislation remaining as it is currently? (Impacts can include financial and equality, diversity and inclusion.)

Please give your reasons and provide any evidence to support these.:

7. Delivery of remote care and technology

45 Do you have any knowledge or experience of areas of technological development that the GOC should be aware of when considering changes to the Act?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

46 Is there any evidence that increased use of technology or remote care may have an impact on patient safety or care in the future?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

47 Are there any unnecessary regulatory barriers in the Act that would prevent any current or future technological development in the eye care sector or restrict innovative care delivery or competition in the market?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

48 Are there any gaps within the Act or GOC policy relating to the regulation of technology or remote care that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these.:

49 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of technology or remote care could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

50 Are there any gaps in the Act or GOC policy relating to the regulation of online sales of optical appliances that present a risk to patients?

Not sure / no opinion

If you answered yes, please give details of what these are, including your reasons and provide any evidence to support these. :

51 If you answered yes to the previous question, do you have any suggestions about how these gaps in the regulation of online sales of optical appliances could be addressed?

Please include your reasons and any evidence or impacts of your suggestions.:

8. Any other areas

52 Are there other areas of our current legislation that you think need to be amended (recognising that the Department of Health and Social Care review will cover our core functions)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

53 Are there any other gaps in regulation where you think legislative change might be required?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

54 Are there any other policies or guidance that the GOC currently produces that should be reviewed or require amendments?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

55 Are there any other impacts of our legislation that you would like to tell us about, including financial impact or impact on those with protected characteristics under the Equality Act 2010 (i.e. age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities)?

Not sure / no opinion

If you answered yes, please give details, including your reasons and provide any evidence to support these.:

Further information

56 Can we publish your response?

Yes, but please keep my name and my organisation's name private

Equality, diversity and inclusion

[redacted]

[redacted]