

## **GOC's response to the Welsh Government's consultation on the Welsh Language Standards (Healthcare Regulators) Regulations**

### **About us**

1. The General Optical Council (GOC) is the UK-wide regulator for optometrists and dispensing opticians, student optometrists and dispensing opticians, and optical businesses. We exist to protect the public by raising standards in the optical professions.
2. We have four core functions:
  - Setting standards for optical education and training, performance and conduct.
  - Approving qualifications leading to registration.
  - Maintaining a register of individuals who are qualified and fit to practise, train or carry on business as optometrists and dispensing opticians.
  - Investigating and acting where registrants' fitness to practise, train or carry on business is impaired.
3. On 1 April 2020 our new strategic plan came into force. Our 'Fit for the future' strategy for 1 April 2020 to 31 March 2025 describes what we plan to do over the next five years to achieve our vision of being recognised for delivering world-class regulation and excellent customer service.
4. We also published an equality, diversity and inclusion report (EDI) alongside our strategic plan, and as an organisation we are committed to promoting equality; valuing diversity; being inclusive; and meeting our equality duties in all our regulatory functions.
5. We currently register around 30,000 optometrists, dispensing opticians, student opticians and optical businesses. We currently have 729 optometrists (making up 4.5% of all optometrists) and 277 dispensing opticians (making up 4% of all dispensing opticians) registered in Wales.
6. We operate from one office based in London and currently have no Welsh speaking staff.

### **Summary response**

7. We welcome and support the aim of the Welsh Government to help further embed the Welsh language in regulatory services so that people in Wales can

access services in a format accessible to them. We already provide a number of services to the public in accordance with our commitment to the Welsh Language Scheme, for example, we provide a translated version of some key pages of our website; we publish our annual report in Welsh and a number of public facing leaflets and guides; and we have a translation/interpretation service available for use by patients and members of the public.

8. Creating bespoke Standards for the regulators will help ensure a consistent approach to patients and the public as well as healthcare professionals. We would like to work with the Welsh Government to ensure that the approach and compliance with the Standards is both proportionate and reasonable given our role as a UK-wide regulator.
9. At this stage we have been unable to fully complete the regulatory impact assessment in the time provided, so are unable to provide detailed responses to the questions asked. As agreed by the Welsh Government we will do this by 2 November 2020 and we are thankful for the extension provided.
10. We would note at this stage that we are not aware of any requests to the GOC for information or services or correspondence in Welsh over the past 12 months. As such, given that we are a UK-wide regulator, we would flag that some of the standards proposed may be disproportionate where the expectation is that the Welsh translation will be made proactively, i.e. standard 2 regarding correspondence. Other standards on the provision of Welsh translations on request and advertising of Welsh language services are entirely proportionate, i.e. standards 22-25 regarding provision of legal proceedings in Welsh.

**Question 1: Do you have any comments on the service delivery standards proposed in the regulations?**

11. We are supportive of measures to facilitate use of the Welsh language in the services we provide. At this stage we are unable to comment on the proportionality and impact of these standards and will provide a full response as part of the regulatory impact assessment.

**Question 2: Part 3 of Schedule 1 to the Regulations includes interpretations for some of the Service Delivery Standards. Paragraphs 16-37 explains how some of the standards work and if what circumstances they apply. Do you have any comments on the interpretation of standards as set out in Part 3?**

12. Overall, we welcome part 3 of schedule 1 in helping to provide clarity on some of the interpretations for the service delivery standards. We will provide a fuller response on the proportionality and impact of these standards when we complete our regulatory impact assessment.

**Question 3: Do you have any comments on the policy making standards proposed in the regulations?**

13. We welcome and support the policy making standards and are committed to continuous improvement in our policy development and implementation. We already consider the Welsh language and accessibility in the screening tool of our equality impact assessments (EIA). We will provide a fuller response on the proportionality and impact of these standards on completion of our regulatory impact assessment.

**Question 4: Do you have any comments on the operational standards proposed in the regulations?**

14. Overall, we understand the value of these standards and the importance of raising awareness of the Welsh language and culture amongst GOC staff. We will provide a fuller response on completion of the regulatory impact assessment.

**Question 5: Do you have any comments on the record keeping standards and standards dealing with supplementary matters proposed in the regulations?**

15. We support the general aim of these standards. Under the Welsh Language Scheme we already publish our annual report and our policy on corporate complaints and feedback in Welsh. We also welcome the Welsh Government's intention to limit bureaucracy in relation to record keeping of the Standards.

**Question 6: We would like to know your views on the effects that these regulations would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.**

**What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

16. We are fully committed to allowing people to communicate and use services in a language which is accessible to them. As mentioned previously, we already provide a number of services accessible for Welsh language speakers and we are supportive of measures to further embed this within regulation.
17. We acknowledge concerns raised by the Welsh Government during the launch of the assurance report on 15 September 2020, that greater promotion of Welsh language services is required by organisations as members of the public often cannot easily find this information and therefore are not using the services. We will take this feedback on board and explore how we can continue to improve uptake of our own services.

**Question 7: Please also explain how you believe the regulations could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no**

**adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

18. We will provide a response to this question when we have undertaken our regulatory impact assessment.

**Question 8: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.**

19. We do not have any other comments at this stage.