

### Our performance review process

We have a statutory duty to report annually to Parliament on the performance of the 10 regulators we oversee. We do this by reviewing each regulator's performance against our Standards of Good Regulation and reporting what we find. Our performance reviews are carried out on a three-year cycle; every three years, we carry out a more intensive 'periodic review' and in the other two years we monitor performance and produce shorter monitoring reports. Find out more about our review process [here](#).

This monitoring report covers the period 1 January 2023 to 31 December 2023.

### Key findings

- We are pleased to report that the GOC has sustained the improvements in the timeliness of its fitness to practise investigations. (Last year, it met our Standard relating to fitness to practise timeliness for the first time in seven years.) The GOC is now carrying out a further programme of work to build on its improvements.
- The GOC carried out multiple consultations and engagements. We have seen clear evidence of the GOC's commitment to working with its stakeholders and their approach has been, on the whole, very well-received.
- The GOC continues to make good progress against its EDI Action Plan 2020-2024 and remains on track to achieve its objectives. It continues to use data and other evidence to identify areas for further work, such as producing a joint statement with stakeholders on zero tolerance to bullying, harassment, abuse and discrimination following the findings of its registrant survey.
- Since updating its Education and Training Requirements in March 2021, the GOC has quality assured adaptations for more than half of existing providers. It also commissioned the Sector Partnership for Optical Knowledge and Education (SPOKE) to establish a Knowledge Hub designed to support providers in meeting the updated requirements.

### Standards met 2022/23



General Standards	5 out of 5
Guidance and Standards	2 out of 2
Education and Training	2 out of 2
Registration	4 out of 4
Fitness to Practise	5 out of 5
<b>Total</b>	<b>18 out of 18</b>

### GOC standards met 2019-22

2021/22	18
2020/21	17
2019/20	16



**30,837<sup>1</sup>**

professionals on the register  
(as at 31 December 2023)

**2,917**

bodies corporate on the register  
(as at 31 December 2023)

## General Standards

The GOC met all five General Standards this year.

These five Standards cover a range of areas including: providing accurate, accessible information; clarity of purpose; equality, diversity and inclusion; reporting on performance and addressing organisational concerns; and consultation and engagement with stakeholders to manage risk to the public.

### Information published by the GOC

The GOC provides information about its work through a variety of channels and this year, it launched a new blog. We noted two issues related to the publication of information:

- ▶ **Fitness to practise decisions published in error:** The GOC was alerted to two decisions that were published on its website when they should not have been. In response, the GOC promptly removed the decisions, apologised to the registrants involved, investigated the causes and extent of the breaches,<sup>2</sup> introduced additional checks and developed an action plan to implement further preventive measures.
- ▶ **Disclosure policy:** The GOC publishes erasure decisions for one year, and is the only regulator that publishes these important decisions for less than five years. It had started reviewing its *Disclosure policy* prior to the publication errors mentioned above and committed to taking account of learning from the errors and also our recommendation that erasure decisions should be published for at least five years.<sup>3 4</sup>

We considered the above in our assessment but decided that Standard 1 was met overall because the GOC continues to publish and publicise a wide range of information about its work in various ways and we saw no instances of inaccurate information being published.

## Equality, Diversity and Inclusion (EDI)

The GOC continues to make good progress against its EDI Action Plan 2020-2024 and remains on track to complete its stated objectives. It published its second annual EDI report this year and continues to hold good levels of diversity data, which it uses to identify areas for further work. EDI remains a focus across the GOC's functions, including its quality assurance of education programmes and the review of its standards for registrants, which started in 2022.

The GOC's annual surveys produced useful EDI insights, which the GOC is using to inform the review of its Standards and other work:

- ▶ its Public Perceptions Survey 2023 highlighted inequalities such as: 7.9% of ethnic minority respondents have never had their sight tested compared to 2.6% of white respondents and respondents with a disability are less satisfied with the service they receive; and
- ▶ its Registrant Workforce and Perceptions Survey 2023 found that high numbers of optical professionals are experiencing bullying, harassment, abuse, or discrimination in the workplace. In response to these findings, the GOC convened stakeholders and issued a joint statement committing to a zero-tolerance approach to bullying, harassment, abuse, and discrimination across all working environments.

### Stakeholder engagement

We have seen clear evidence of the GOC's commitment to working with its stakeholders and their approach has been, on the whole, very well-received. Examples of consultations and engagements from this year include:

- ▶ consultations on: a draft statement on verification of contact lens specifications and definition of aftercare; removing gender from the public register; the international registration process;
- ▶ engaging with stakeholders to develop its Strategic Plan for 2025-2030. A formal consultation is planned for April/May 2024; and

- sharing information about its plans to review its Standards at the Optical Sector Policy Forum, the Sector Education Forum and Business Registrants Day.

The GOC also published its response to the call for evidence it issued last year on the need for changes to the Opticians Act and associated policies.



[In respect of the GOC’s call for evidence] **“We appreciate the GOC’s open approach in responding publicly to our recommendations with a clear and evidence-based rationale...We welcome the GOC’s new approach in consulting widely and separately on each key topic, taking the time to get these issues right for our profession. However, in order to provide a more informed view, we expect more clarity on the GOC’s proposed changes in due time, as regulatory change will affect our sector for many years.”**

**“It also seems that the GOC is thinking carefully about business regulation...is aware of the range of ways this could be implemented, and is interested in the views of the sector...We particularly welcomed the GOC being pro-active in engagement in this space, attending one of [our] full council meetings delivering a presentation and workshop on the scoping and framing of business regulation policy.”**

Feedback from different stakeholders

## Guidance and Standards

**The GOC met both Standards for Guidance and Standards this year.**

In April 2023, the GOC launched a review of its standards for optometrists and dispensing opticians and its standards for optical students. Both sets have been in place since April 2016.

The GOC is developing the new standards using evidence from various sources, including the response to its call for evidence and views obtained through stakeholder events. It plans to consult on the draft revised standards in early 2024 and expects to publish the new standards in autumn 2024. Stakeholders have been positive about the GOC’s approach so far.



**“The GOC has commenced its work on the review of its Standards of Practice for Optometrists and Dispensing Opticians, and its engagement so far with stakeholders has been very open including a series of roundtables to discuss various aspects including those that have come to the forefront since the standards first came into effect in April 2016 such as the extent of use of social media and technology.”**

**“we are so far impressed with the approach the GOC is taking to [the standards review].”**

Feedback from different stakeholders

## Education and Training

**The GOC met both Standards for Education and Training this year.**

The GOC updated its Education and Training Requirements (ETR) in March 2021. The GOC has assessed the adaptations of more than half of the existing providers and found they meet the new ETR. The GOC is regularly convening and talking to stakeholders to identify and address key risks arising from the changes and it commissioned the Sector Partnership for Optical Knowledge and Education (SPOKE) to establish a Knowledge Hub designed to support providers in meeting the updated requirements.

We received no concerns about the ETR themselves and mostly positive feedback about their implementation.

Some stakeholders were unhappy with their experience of the quality assurance process and the timeliness of the different stages. One stakeholder said its concerns from last year about the consistency and transparency of the process still remained this year. Another stakeholder felt the GOC's decision-making about complaints related to education and training had been inconsistent.

The GOC publishes information about its quality assurance processes, but we noted it published limited information about how it manages complaints about education providers. Shortly after we highlighted this, the GOC published a new webpage on how it handles complaints about education programmes or providers and the possible outcomes. The GOC was also already exploring solutions to the other points raised by its stakeholders, including how it can share more timely feedback with providers. Overall, we were satisfied that the GOC has risk-based and proportionate quality assurance processes in place, and we welcome the promptness with which it acted on our feedback.

## Registration

**The GOC met all four Standards for Registration this year.**

### Accuracy of the Register

The GOC continued to publish an accurate register and to process registration applications efficiently; the median time taken to register applicants from receipt of a completed application form was less than a week for both UK and international graduates.

### Illegal Practice investigations

After the GOC updated its Illegal Practice Protocol in June 2022, it received more referrals about illegal practice and closed a greater proportion of cases for not meeting its test for prosecution. It is too early to say whether these changes are directly linked to the new protocol so we will continue to monitor the data for trends.

The GOC appears to be taking longer to progress illegal practice cases; only 56% were closed within six months during the period July 2022 to June 2023 compared to 90% or more in each of the three previous years. We note that challenges with staff resourcing will have impacted timeliness, as the GOC temporarily redirected resources from illegal practice cases to fitness to practise casework. We are satisfied that the GOC has a proportionate and risk-based approach for managing illegal practice cases. However, we will be closely monitoring the timeliness of these investigations.

### Continuing Professional Development (CPD)

This is the second year of the GOC's new CPD scheme, which is on a three-year cycle from 2022-24. The GOC is closely monitoring completion rates and wrote to registrants who had not logged a personal development plan at the start of the cycle. It published new

Personal Development Plan guidance and resources to help registrants and is looking at producing similar documents on self-directed learning and peer review.

Three CPD providers told us about their experience of the new CPD scheme and reported:

- technical issues that took several months to resolve;
- a lack of clarity in relation to the new requirements;
- the need to review the new requirements in relation to peer review; and
- a lack of responsiveness from the GOC when these issues were raised.

The GOC included the feedback in a rapid review of the scheme so far. It shared the review with stakeholders and committed to acting on the findings.

It is clear from the feedback that there were challenges in implementing the new scheme. We are satisfied that the GOC is working with, and listening to, its stakeholders to make improvements and we have not seen any evidence that raises concerns about the proportionality of the GOC's requirements.

## Fitness to Practise

**The GOC met all five Standards for Fitness to Practise this year.**

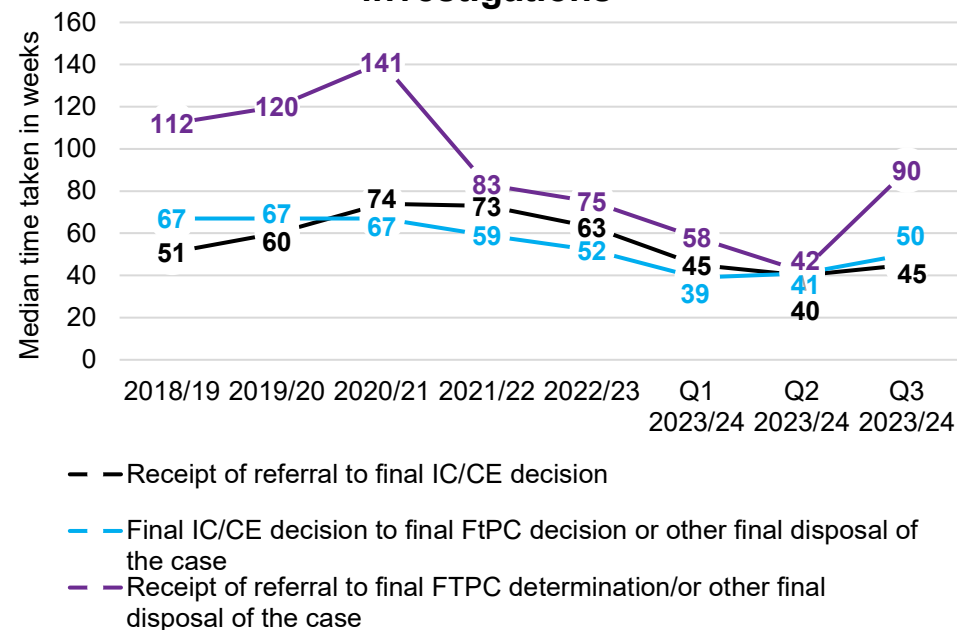
### Timeliness of fitness to practise investigations

The GOC met Standard 15 last year (after not meeting it<sup>5</sup> for seven years) as it significantly improved the time taken to progress fitness to practise investigations through its 2019-21 FTP Improvement Programme.

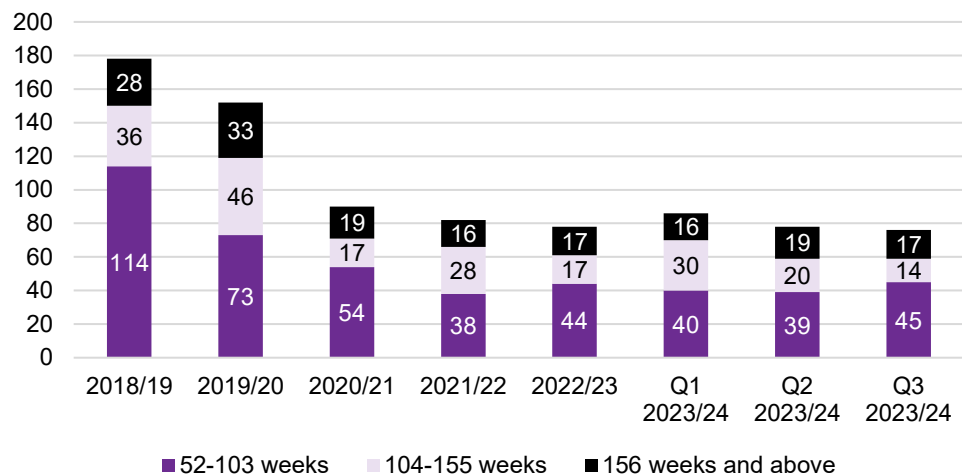
We are pleased to report that the GOC has sustained those improvements, with median timeframes continuing to fall in the first three quarters of the review period (Figure 1)<sup>6</sup> and the number of older cases in its caseload remaining stable (Figure 2). We noted the increase in timeliness in the last quarter of the review period, but the GOC's median end-to-end timeframe remains one of the shortest amongst the regulators. We were satisfied that timeliness was reasonable across the review period as a whole.

The GOC is now implementing its FTP Improvement Programme 2022-25 to further build on its improvements and ensure they are sustained. We will continue to monitor the data closely.

**Fig. 1 Timeliness of fitness to practise investigations**



**Fig. 2 Number of older cases**



### Fitness to practise decisions

We saw no evidence of significant concerns about the GOC’s fitness to practise decisions and one stakeholder described the GOC’s outcomes as ‘*invariably honest, fair and appropriate.*’

We sent the GOC learning points about a small number of final hearing decisions and we noted a case where the registrant successfully appealed the decision to the High Court. There were no


<sup>1</sup> This figure includes 6,204 students.

<sup>2</sup> It found there were five breaches (including the initial two) out of all the 227 decisions published between July 2021 and July 2023. The breaches were limited to 2022/23.

<sup>3</sup> [https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/health-professional-regulators-registers-2010.pdf?sfvrsn=99c77f20\\_10](https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/health-professional-regulators-registers-2010.pdf?sfvrsn=99c77f20_10)

themes within the issues identified so we are satisfied they do not indicate systemic issues in the GOC’s decision-making.

The GOC routinely discusses learning from its fitness to practise decisions at internal forums, including its Decision Review Group. We will monitor how it responds to the feedback it received about final hearing decisions this year.



**Quick links/find out more**

- ▶ Find out more about our performance review process
- ▶ Read the GOC’s 2021/22 performance review
- ▶ Read our Standards of Good Regulation

### Professional Standards Authority for Health and Social Care

Telephone: 020 7389 8030

Email: [info@professionalstandards.org.uk](mailto:info@professionalstandards.org.uk)

Web: [www.professionalstandards.org.uk](http://www.professionalstandards.org.uk)

© Professional Standards Authority for Health and Social Care  
March 2024

<sup>4</sup> Shortly after the 2022/23 review period ended, the GOC published its revised disclosure policy, which confirms it will publish erasure decisions for five years unless the registrant is restored within five years.

<sup>5</sup> Or equivalent Standard in the previous version of our Standards (FTP Standard 6).

<sup>6</sup> In Q4 2022/23 (the first quarter of the review period), the median time from receipt of referral to IC was 63 weeks and to final hearing 67 weeks and the median time from IC to final hearing was 49 weeks.