

## Standards response form

- **GOC standards of practice consultation**

Thank you for responding to our consultation on our standards of practice. Your views are extremely valuable to us, and will help us to develop our new standards.

This consultation is being run on our behalf by Collaborate Research. Your feedback will go to Collaborate Research to analyse on our behalf.



### Publication of consultation responses

Unless you state otherwise (and an automatic disclaimer generated by your IT system will not be taken as such) we will assume you are happy for us to publish your response, including your name, and to share it with other appropriate bodies and stakeholders. We would however encourage named responses where possible and particularly from representative organisations so that we can reflect that the response is on behalf of members / stakeholders rather than an individual response.

- **Please tick here if you are only happy for us to share your responses anonymously:**

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### Your details

- Name: \*
- Organisation:
- Which category of respondent best describes you?
- Please specify if other:

Our work includes overseeing nine health and care professional regulators, including the GOC.

## Questions

We have a number of structured questions below. You do not have to answer all of the questions when responding – please feel free to respond just to the questions you feel are relevant to you. There are opportunities throughout within the document to provide your specific comments on both the framework for standards and the standards themselves.

**1: Does the new framework for standards as outlined in *Figure 1* of the consultation document make clear the GOC's new approach to setting standards and how these standards are distinct from the guidance provided by other organisations?**

Answer:

We note that framework currently states that the GOC may need to produce supplementary guidance in response to a 'direction' from the Government or the Professional Standards Authority. As neither we nor the Government can direct the GOC to produce guidance we suggest the word direction should be replaced with recommendation, suggestion or request.

Please give your reasons:

**2: Do you support the GOC's new approach to setting standards?**

Answer:

We support the GOC's commitment to produce clear outcome-focused standards and to explain how its standards and guidance relate to guidance produced by professional bodies, employers and others. We consider that professional codes should be based on principles and should focus on the outcomes that need to be achieved. This allows professionals to apply principles sensibly to the many varied and changing circumstances they face.

• Please give your reasons:

•

**3: Do you support there being two sets of standards, one for optometrists and dispensing opticians and one for students?**

• Answer:

Having separate standards for students provides useful clarity. Furthermore this separation will assist if the GOC's review of its approach to student regulation leads to an alternative approach which no longer requires the GOC to issue standards for students.

• Please give your reasons:

•

**The remainder of the questions relate to the standards for optometrists and dispensing opticians and standards for optical students. Please indicate whether you are responding with respect to just one set or both sets of standards.**

• Just optometrists and dispensing opticians

• Just optical students

• Both

•

**4: Do the standards make it clear what the GOC expects from our registrants?**

• Answer:

• Please give your reasons:

•

**5: Do the standards cover all relevant areas of optical practice and/or optical training?**

• Answer:

• Please give your reasons:

•

**6: Are the standards sufficiently flexible to accommodate any changes in practice and education that may occur in the next five years?**

• Answer:

• Please give your reasons:

•

**7: Are the standards presented in a way that is clear, accessible and easy to use?**

• Answer:

• Please give your reasons:

The language of the standards is clear and the structure and conciseness of the document make it easy to understand. The accessibility of the standards will depend on how they are distributed and whether they are published in different languages and formats that are accessible to people with sight or cognitive impairments.

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**8: Is there anything missing, incorrect or unclear in the standards?**

• Answer:

We welcome the inclusion of the candour requirements in Standard 20. However we note that it omits a couple of the requirements included in the joint statement on candour the GOC and other regulators made in October 2014. We consider that these should be added. The first is the requirement to be candid with colleagues, employers and relevant organisations when things go wrong, and take part in reviews and investigations when requested. The second is the requirement to support and encourage others to be candid when things go wrong.

Standard 12.2 states that raising concerns is sometimes referred to as whistle-blowing and certain aspects of this are protected by law. To encourage registrants to raise patient safety concerns we consider that this reference to the protection afforded by the Public Interest Disclosure Act 1998 should be phrased in a more accurate and reassuring manner. The law protects people who make protected disclosures rather than 'certain aspects' of whistle-blowing.

- Please specify:

- 

**9: Are there any specific issues or barriers that could prevent stakeholders from implementing or complying with the standards?**

- Answer:

- Please specify:

- 

**10: Are there any aspects of the standards that could have an adverse or negative impact on certain groups of patients, optometrists, dispensing opticians, optical students, optical**

**businesses, optical training institutions or any other groups?**

- Answer:

- Please specify:

•

**11: Are there any areas of the standards that could discriminate against stakeholders with specific characteristics? Please consider sex, age, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities or any other characteristics.**

- Answer:

- Please specify:

•

**12: Overall, do you expect that the standards will achieve the objectives set out in paragraph 19 of the consultation document?**

- Answer:

- Please give your reasons:

•

**13: Overall, do you expect that the standards will be beneficial to, and have a positive impact on, optical practice and education?**

- Answer:

- Please give your reasons:

•

**14: Do you have any other comments that you wish to make on the new framework for standards, the new standards for optometrists and dispensing opticians or the new standards**

## for students?

We would welcome a copy of the literature review about patient expectations referred to in paragraph 30 of the consultation document.

Paragraph 50 explains that you intend to monitor and evaluate the impact of the new standards. We would be interested to hear your plans in this regard, as we have a particular research interest in understanding the impact of regulators' standards and other functions and, how best to evaluate this impact.

We would have found it helpful if the consultation document offered alternative methods to respond to this consultation. We have not found the webform user friendly as drafts cannot be saved.

We hope you find our comments helpful. If you would like to discuss our response with us please contact Douglas Bilton, Assistant Director of Standards and Policy at [douglas.bilton@professionalstandards.org.uk](mailto:douglas.bilton@professionalstandards.org.uk)

- Please specify:

- 

## More about you:

The GOC strives to be as diverse as the public it protects and welcomes consultation responses from everyone, regardless of age, disability, gender reassignment, race, religion or belief, ethnicity, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity. We monitor the diversity of all the individuals who respond to our consultations to ensure that we have heard from a diverse range of people and that we can identify where further engagement or consultation may be required. To help us to monitor this, please complete the following questions if you feel comfortable to do so. Providing this information is optional, but we would be grateful for your co-operation. Information provided will be treated in the strictest confidence under the Data Protection Act 1998 and will be used for monitoring purposes only. No information in this section will be published or used in any way which allows any individuals to be identified.

• **Age**

- 16-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65+
- Prefer not to say

• **Disability**

• **Do you consider yourself disabled?**

- Yes (please specify below)
- No
- Prefer not to say

• If yes, please specify:

• [The Equality Act 2010 defines disability as a physical or mental impairment which has a substantial long-term effect on a person's ability to carry out normal day to day activities]

• **Gender**

- Female
- Male
- Prefer not to say

• **My gender identity is different from the gender I was assigned at birth:**

- Yes
- No

• I describe my gender identity as

•

## Sexual orientation

- Bisexual
- Gay man
- Gay woman/lesbian
- Heterosexual
- Prefer not to say

## Marital status

- Civil partnership
- Divorced/ legally dissolved same-sex civil partnership
- Married
- Partner
- Separated
- Single
- Not stated
- Prefer not to say

## Are you pregnant, on maternity leave, or returning from maternity leave?

- Yes
- No
- Prefer not to say

## Ethnicity

### Asian/Asian British

- Indian
- Pakistani
- Bangladeshi
- Chinese
- Any other Asian background (please specify below)

• Please specify if other:

• **Mixed ethnic background**

- White and Asian
- White and Black African
- White and Black Caribbean
- Any other mixed/multiple ethnic background (please specify below)

• Please specify if other:

• **Black/African/Caribbean/Black British**

- African
- Caribbean
- Any other Black/African/Caribbean background (please specify below)

• Please specify if other:

• **White**

- English/Scottish/Welsh/Northern Irish/British
- Irish
- Gypsy or Irish Traveller/Any other White background (please specify below)

• Please specify if other:

• **Other**

- Arab
- Any other ethnic background (please specify below)
- Prefer not to say

• Please specify if other:

• **Religion/belief**

- Buddhist
- Christian
- Hindu
- Jewish
- Muslim
- Sikh
- No religion
- Other religion/faith (please specify below)
- Prefer not to say

• Please specify if other:

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