

This monitoring report covers the period 1 January 2024 to 31 December 2024. You can find out more about our [performance review process](#) at the end of this report.

### Key findings

- The GOC met our Equality, Diversity and Inclusion (EDI) Standard. We saw examples of good practice in the way the GOC uses its staff networks to embed EDI, the way it shares learning about EDI and widening participation through its annual education reports and the way it uses the findings of its registrant and public perceptions surveys to inform its work. We identified a small number of areas for improvement, some of which the GOC identified for itself and is already taking steps to address. We will continue to monitor the GOC's EDI activity.
- The GOC carried out several consultations this year, including on: changes to its standards for registrants and businesses; its Corporate Strategy 2025-30; and on a future model for business regulation. Stakeholders continue to be very positive about the way the GOC consults and works with them. The GOC's new standards and Corporate Strategy came into effect in 2025 and we will monitor their implementation.
- We have previously found the GOC's documented process for quality assuring education programmes to be risk-based and proportionate. We received positive feedback about the process this year, but also some concerns. We did not identify any public protection risks arising from the concerns, but they are similar to concerns we have received in the past. The GOC will also be transitioning to a new quality assurance process next year. We will use our periodic review next year to explore this area of the GOC's work in more depth including the issues raised by stakeholders.
- There were a small number of errors in the GOC's register this year that were concerning because they gave rise to public protection issues. The GOC acted quickly on each occasion to correct the register, investigate the causes and put measures in place to prevent and detect any further occurrences. We expect the GOC to closely monitor this area and we shall do the same through our periodic review next year.

### Standards met 2023/24



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 2020-23

2022/23	18
2021/22	18
2020/21	17



**31,499<sup>1</sup>**

professionals on the register  
(as at 31 December 2024)

**2,913**

bodies corporate on the register  
(as at 31 December 2024)

## 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.

This section of our report mainly focuses on Standard 3 because we have used a new approach to assessing the regulators against this Standard. More information is available [on our website](#), including our guidance document and our new evidence framework.

### Information published by the GOC

The GOC continues to publish a broad range of information about its work through a variety of mediums to reach different audiences. There were some inaccuracies in the GOC's register this year (which we also considered under Registration, Standard 10). We considered this in the context of the other, wide-ranging and accurate information the GOC published and concluded the GOC met Standard 1.

We also monitored two issues that arose last year and were satisfied that both are resolved:

- ▶ After five fitness to practise decisions were published in error last year, the GOC introduced additional controls which appear to have been effective as we have not seen, or heard reports of, further issues this year.
- ▶ The GOC updated its *Disclosure policy* in February 2024. Erasure decisions, which were previously published for one year, are now published for five years. This is in line with our policy position.<sup>2</sup>

## Corporate Strategy 2025-30

Between April and July 2024, the GOC consulted on a new strategy, setting out its vision for 'safe and effective eye care for all'. Some stakeholders felt the GOC's proposals were overly ambitious, extending to areas beyond the GOC's remit and control. In response, the GOC recognised the importance of working collaboratively across the sector to deliver its aims. The strategy was approved in December 2024. We will monitor its implementation in future performance reviews.

### Our assessment of the GOC's performance against Standard 3

As part of our new approach, we have broken down the Standard into four separate outcomes. For a regulator to meet the Standard, we would need to be assured that the regulator has met all four of the outcomes. Our assessment of the GOC's performance against the four outcomes is set out below.

#### Outcome 1: The regulator has appropriate governance, structures and processes in place to embed EDI across its regulatory activities

The GOC has clear governance, structures and processes in place to embed EDI. It has:

- ▶ An EDI action plan and it publicly reports progress to its Council on a quarterly and annual basis. During this review period, the GOC transitioned from its EDI action plan 2020-24 to a 2024-25 action plan and developed an EDI Strategy for 2025-30, which aligns with its next five-year corporate strategy.
- ▶ Clear lines of accountability for delivery of its action plan, with Council having overall responsibility. Council meeting discussions indicate a genuine focus and commitment to EDI.

- ▶ A process for considering equality impacts in all aspects of its work. This year, when the GOC decided to remove the gender of registrants from its public register, it published an equality impact assessment (EIA) which demonstrated careful consideration of how this decision might impact different groups.

The GOC recognises the importance of EDI data collection and analysis. It holds up-to-date data for employees, including senior leadership, but response rates from other key decision-makers (its Council, Committee members and clinical advisors) decreased this year.<sup>3</sup> The GOC's action plan includes work aimed at improving data collection and analysis. We will monitor these actions and their impact.

### *Good practice*

The GOC has a wide range of active staff networks. This year it launched a new group on social mobility, demonstrating it proactively identifies and creates new networks to improve coverage of different groups and demographics. Staff network activities included workshops on neurodiversity, blogs on LGBTQ+ history month and a Spring Festivals Celebration, which marked various religious and spiritual events that traditionally take place in the Spring.

We think the way the GOC uses these networks to raise awareness and help embed EDI across the organisation is good practice.

**Outcome 2: In terms of EDI, the regulator ensures that registrants and students are equipped to provide appropriate care to all patients and service users, and have appropriate EDI knowledge and skills**

The GOC sets standards for students, optometrists and dispensing opticians, optical businesses and education providers. The standards in place during this review period included requirements designed to

ensure registrants and students are equipped to provide appropriate care to all patients and service users.

- ▶ **Students, optometrists and dispensing opticians** must: modify treatment based on the patient's needs and preferences; promote equality, value diversity, be inclusive and not discriminate; and challenge discrimination.
- ▶ **Optical businesses** must: provide an accessible patient care environment; provide information in an accessible way; and promote equality, value diversity and not discriminate.
- ▶ **Education providers** must: prepare students to take account of relevant patient history which may include personal beliefs and cultural factors; and provide experience of working with a range of patients in a variety of settings.

### *Good practice*

The GOC produces annual education monitoring reports based on information gathered from education providers. The reports include EDI data, key themes, risks and good practice. Last year, the GOC also started including information about how providers are widening participation to education and what impact those initiatives are having. We think the reports are good practice for sharing learning on EDI, in particular the widening participation activities.

## Opportunity for improvement

Aside from setting standards, there is limited evidence of the GOC supporting and encouraging registrants to improve their EDI knowledge and skills. It does not prescribe CPD topics for registrants or produce, or signpost registrants to, resources on EDI.

The GOC identified this gap and started taking steps to address it. In January 2025 (just after the end of our review period, but to coincide with the start of the new standards and CPD cycle), the GOC published updated CPD guidance for registrants. It highlights key changes to the standards and prompts registrants to 'undertake more CPD activities that support better care for patients in vulnerable circumstances and which support better workplace cultures.' To support the new standards, the GOC also plans to produce new guidance on the care of patients in vulnerable circumstances and on maintaining appropriate sexual boundaries. We will monitor this work.

### Outcome 3: In terms of EDI, the regulator makes fair decisions across all regulatory functions

The GOC uses different mechanisms to ensure it is making fair decisions across its regulatory functions. It:

- Provides regular EDI training to all staff, including decision makers like Council and Committee members and fitness to practise panellists.
- Produces guidance for decision makers for each stage of its fitness to practise process. Its *Triage decision-making guidance*, *FTP Operation Manual* and *Hearings and indicative sanction guidance* all mention allegations of discriminatory behaviour and how they should be considered. However, its guidance for Case Examiners and the Investigating Committee could be strengthened as they do not mention these types of allegations.

- Collects, analyses and, where it can, publishes a wide range of EDI data, including on: registrants; registrants under fitness to practise investigation; fitness to practise complainants; and its recruitment processes.
- Recently established an Unfair Outcomes Working Group whose work will include: considering potential unfair fitness to practise outcomes; commissioning further research; developing a consistent definition of 'unfairness' in decision making; improving data collection and analysis to better understand the volume and nature of unfair outcomes and differential attainment; and formulating action plans to reduce unfair differential attainment.

### Outcome 4: The regulator engages with and influences others to advance EDI issues and reduce unfair differential outcomes

The GOC:

- Seeks and acts on feedback from a diverse range of stakeholders through its annual surveys, consultations and pre-consultation work, which recently included commissioning research on patient and public views on the standards.
- Provides and promotes routes for people to speak out against bias and discrimination, including via its fitness to practise process, its *Speaking Up policy* for staff (recently replaced by a *Freedom to Speak Up policy*) and *Speaking Up guidance for registrants*.

### Good practice

The GOC has been running annual surveys of registrants and the public for several years and using the findings to inform its work. One recent example was the joint statement it published on bullying, harassment, abuse, and discrimination,<sup>4</sup> which was prompted by the findings from its 2023 registrant survey. The GOC also used its survey findings to inform the review of its standards and to identify new areas for future research. We think the way that the GOC applies the findings from its annual surveys is good practice.

We identified a small number of areas where improvements could be made, but the GOC's overall performance against Standard 3 is positive. There is evidence of the GOC undertaking a variety of activities under each of the four outcomes and we noted several areas of good practice. The GOC met all four outcomes.

### Reporting on performance

The GOC continues to report regularly and publicly on its performance to its Council and Committees and through its annual report. It also identified and proactively notified us of two separate incidents relating to its register (mentioned further under the Registration Standards). It provided detailed accounts of the steps it was taking to address the issues and prevent recurrence. We commend the GOC for proactively sharing information with us about serious incidents. These actions are indicative of an organisation with a mature approach to self-reporting and learning from incidents.

### Consulting and working with stakeholders

For a second consecutive year, the GOC performed well against our standard for consulting and working with stakeholders to identify and manage risks (Standard 5). It seeks stakeholders' views to inform its proposals before formally consulting and it reports transparently about the outcomes of its consultations, including how responses influenced its final plans and decisions.

Stakeholders were very positive about the GOC's approach to consultations and other engagement activities.



“The GOC is to be congratulated on the transparent and inclusive way it has engaged with, and consulted, stakeholders on its review of standards for individual registrants.”

“The recent consultation on the GOC Strategy was very welcome and provided a meaningful opportunity for our organisation and its stakeholders with lived experience to comment on how primary eye care services [are] being delivered. The process was relatively simple and provided enough time for significant engagement.”

Feedback from different stakeholders

## Guidance and Standards

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

### Standards for registrants

The GOC has three sets of standards for registrants: *Standards of Practice for Optometrists and Dispensing Opticians*; *Standards for Optical Students*; and *Standards for Optical Businesses*. This year, after several years of work to review these standards,<sup>5</sup> which included seeking early views from stakeholders, the GOC consulted on proposed changes.

The new standards, which came into effect in January 2025, retain the previous overarching standards but the GOC has added to the underlying components to strengthen the EDI requirements and cover: the use of digital technologies; boundaries and appropriate behaviour

towards colleagues as well as patients and the public; and online communications.

The GOC plans to produce guidance to support the new Standards regarding the care of patients in vulnerable circumstances and maintaining appropriate sexual boundaries. It is aiming to consult on the new draft guidance in Spring 2025. We will monitor this work.

### **New position statement on verification of contact lens specifications**

In February 2024, the GOC published a new position statement<sup>6</sup> confirming that, in certain circumstances, it will no longer pursue sellers who do not comply with contact lens specification verification requirements on copies. The new position was based on a review of the available evidence and a consultation. It is an example of the GOC updating its guidance based on current evidence of risk.

## **Education and Training**

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

### **Education and Training Requirements (ETR)**

Since the GOC introduced its new ETR in March 2021, we have not identified, or received any, concerns about the adequacy or appropriateness of the requirements.

The GOC is commissioning research on the effectiveness of the new outcomes and standards, which is expected to start in 2026. We welcome these proactive plans to obtain evidence of impacts and effectiveness and will monitor it in future performance reviews.

One organisation told us it has ongoing concerns about the funding model for education and training under the new standards and feels

the GOC could show more leadership in this area. We have seen the GOC proactively monitoring this area, with the issue being discussed by its Education Committee and Council. The GOC mentioned funding in its most recent annual education monitoring report,<sup>7</sup> recognising it as a key risk and that there is concern within the sector about it. The GOC has met with relevant organisations<sup>8</sup> within each devolved nation about funding and plans to continue engaging on the issue.

### **Quality assurance of education programmes**

The GOC's assurance activities this year included:

- ▶ Continuing to assess adaptations to the new ETR. All but three existing qualifications have now adapted to the new requirements.
- ▶ Approving recruitment to the first dispensing optics apprenticeship.
- ▶ Ongoing annual monitoring of approved qualifications. It published its most recent monitoring report on the education sector in December 2024.

The GOC's annual monitoring this year continued to follow the process set out in its Education handbooks.<sup>9</sup> Next year, programmes delivered against the new ETR will be subject to a new quality assurance and enhancement method (QAEM). Approved programmes that are being 'taught out' under the previous education standards will be subject to an amended version of the handbook process, which the GOC implemented in December 2024. Reviews will be done on the papers without a site visit unless there is evidence of concerns. We will monitor the transition to the new quality assurance process.



### Mixed feedback from stakeholders

One organisation told us it 'is confident that the routes to qualification and higher qualifications are effective and deliver registrants with the skillsets to provide safe, effective twenty-first century eyecare needs.'

A different organisation raised concerns about its experience of the GOC's quality assurance process, including in relation to transparency and proportionality. We have received some similar concerns in the past.

### How we are acting on the feedback

The GOC's documented quality assurance processes appear proportionate and transparent. We did not identify any public protection risks and were satisfied that Standard 9 is met. However, it is important that processes are proportionate and reflect the principles of right-touch regulation. Through our periodic review of the GOC next year, we will explore this area of the GOC's work in more depth, including through further stakeholder engagement.

## Registration

The GOC met all four Standards for Registration this year.

### Gender on the Register

Following last year's public consultation, the GOC stopped publishing gender on its public register this year, primarily on the basis that this

information is not necessary for public protection. We have no concerns about this decision as it is in line with our policy position that 'only details necessary for the purposes of public protection should be on the register.'<sup>10</sup> The GOC will continue to collect and hold data on registrants' gender for analytical purposes.

### Accuracy of the Register

There were three occasions where issues arose with the GOC's register this year:

- ▶ two instances of interim order restrictions not showing on the register (one for less than three days, the other for 11 days);
- ▶ after a routine IT update, some registrants were not showing when searched for and fitness to practise decisions were not linked to the registrant records (although the registration statuses were correct and the decisions were still available elsewhere on the GOC website). The GOC identified and resolved this issue within 24 hours.

Our decision on Standard 10 was finely balanced. While the number of errors was small, they were concerning because they gave rise to public protection issues and they reflect control failures. We have seen issues with the GOC's register before, although it has been several years since the last error. In mitigation, the GOC acted quickly on each occasion to correct the register, investigate the causes and put additional measures in place to prevent and detect future occurrences. We decided the Standard was met but expect the GOC to closely monitor this area. We shall do the same through our periodic review next year.

### International registration process

This year saw developments relating to the GOC's application process for professionals who qualified outside the UK:

- ▶ In January 2024, the GOC introduced new verification checks to reduce fraudulent applications. It reported an initial decline in

applications but an increase in the calibre of applicants. The checks do not appear to have impacted median processing times for applications, which remain at less than one week from receipt of completed application.

- As mentioned under the General Standards, the GOC consulted on changes to its international registration process this year. It expects to implement the new approach in September 2026. We will monitor any developments.

## Continuing Professional Development (CPD)

Since introducing a new three-year CPD scheme in 2022, the GOC has been closely monitoring completion rates and taken action to try to support registrants with the transition to the new scheme. In this final year of the 2022-2024 cycle, the GOC increased activity to promote and raise awareness of the requirements and the guidance and resources available for registrants. For this first cycle only, the GOC decided to take a flexible approach to non-completion of a personal development plan (PDP) and reflective exercise. We considered whether this amounted to a lowering of the standards for CPD but were satisfied that the GOC's requirements as a whole were still appropriate and proportionate and we have not seen, or received, any information to suggest otherwise.

As mentioned under Standard 3, the GOC updated its CPD guide for registrants to reflect changes in its standards for registrants from January 2025.

## Fitness to Practise

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

## Registrar Closure policy

At the end of 2023, the GOC introduced a new *Registrar Closure policy*. Under this policy, cases that do not fall within the grounds described in the GOC's legislation<sup>11</sup> can be closed without a referral to the Case Examiners.

The policy sets out objective criteria for closure which appear appropriate. The GOC has also incorporated several controls into the closure process to minimise the risk of cases being closed inappropriately: staff have been trained; closure decisions require approval from senior staff; and parties can request a review of a decision. The GOC only closed 10 cases under the new policy in its first year of operation.

We have not identified any concerns about the new policy. We will review any evidence of its impact in more detail during our periodic review next year. This will include continuing to monitor the data.

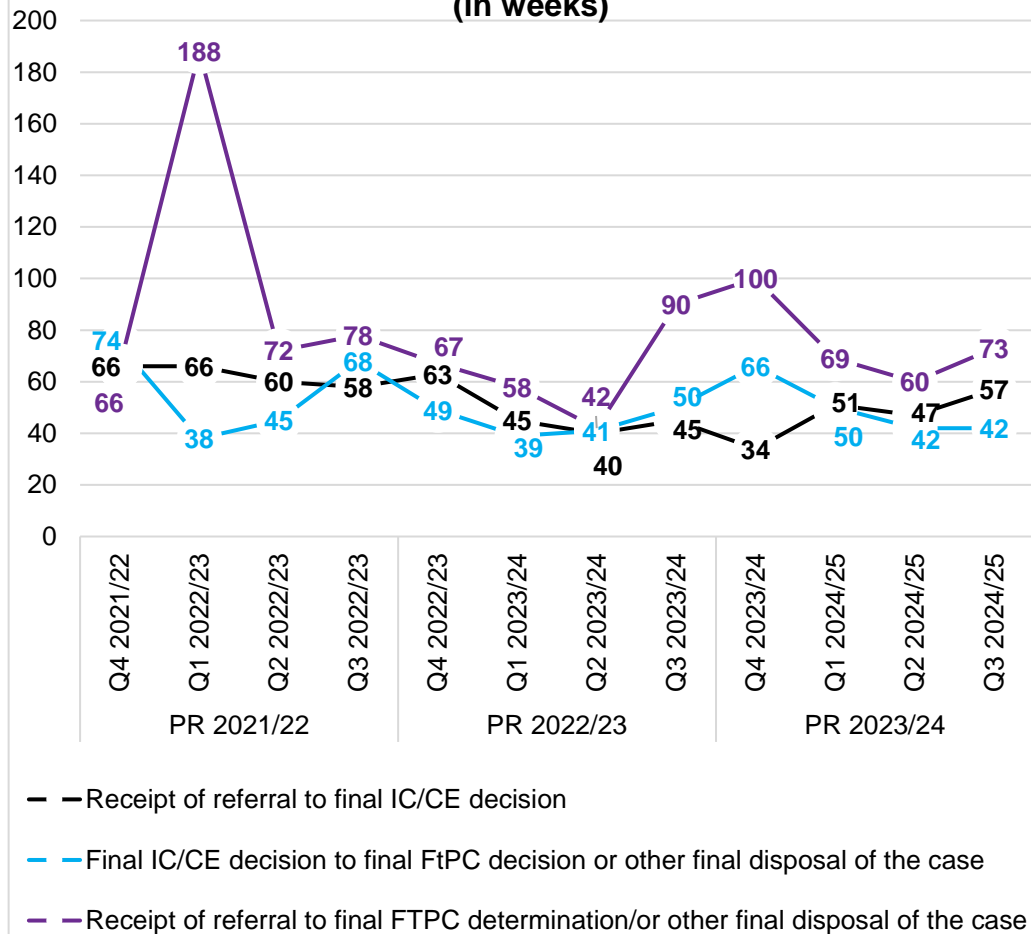
## Fitness to practise investigations

The GOC continued implementing its FTP Improvement Programme 2022-25. This year, work included launching a new Case Management System intended to help drive efficiencies. It also restructured its Fitness to Practise directorate, bringing more legal work in-house. Staff vacancies, which the GOC reported were impacting timeliness of investigations, have now been filled.

Two organisations told us they had concerns about the GOC's fitness to practise performance, noting delays in progressing cases as well as some case-specific issues. The GOC engaged positively with the feedback, committing to identifying and sharing learning from it. Some of the data (Figure 1) reflects the stakeholders' concerns about increases in timeliness, but no significant increases have been sustained and overall performance throughout the year is comparable to last year. The GOC's median timeframes for investigations remain some of the shortest amongst the regulators. We will continue to monitor the data and stakeholder feedback closely.



**Fig. 1 Median time taken for key timeliness measures (in weeks)**



### Assessing and managing risk in fitness to practise cases

The GOC has not changed its approach to assessing and managing risk in fitness to practise cases. We have had no concerns about its performance in this area in recent years and seen no evidence this year to suggest it has deteriorated. Our data shows that the GOC continues to apply promptly for interim orders.

### Fitness to practise decisions

In recent years, we have rarely identified or received concerns about the GOC’s decisions, including when we have undertaken more detailed reviews of decisions such as through an audit or our Section 29 work reviewing final hearing decisions.

Last year we said we would monitor how the GOC responded to feedback about a small number of final hearing decisions. The GOC responded by identifying learning which fed into: training for panel members; updated hearings processes; and a review of its indicative sanctions guidance.

Again this year, we identified very few issues and the GOC continues to be responsive to feedback from us and stakeholders. We are satisfied that the GOC has robust and effective controls in place to ensure it is making appropriate decisions at each stage of its fitness to practise process.

### Supporting parties to participate in the fitness to practise process

The GOC has mechanisms in place designed to support parties to participate in the process and is implementing improvements, through both its self-initiated FTP improvement programme and in response to feedback.

We received mixed feedback from one organisation, who described regular meetings with the GOC as being a ‘positive and improved dialogue’ but reported concerns about the GOC’s approach to reasonable adjustments in one case. We did not see evidence to suggest widespread or systemic concerns about the GOC’s approach but note that even a single case can provide opportunities for learning. We encourage the GOC to keep the issue of reasonable adjustments under review to ensure it is doing what it can to support registrants to engage with the process. We will monitor whether future feedback or evidence raises similar issues and, if so, may consider exploring this area further in next year’s periodic review.

## 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. The judgements we make against each Standard incorporate a range of evidence to form an overall picture of performance. Meeting a Standard means that we are satisfied, from the evidence we have seen, that a regulator is performing well in that area. It does not mean there is no room for improvement. Where we identify areas for improvement, we pay particular attention to them as we continue to monitor the performance of the regulator. Similarly, finding that a regulator has met all of the Standards does not mean perfection. Rather, it signifies good performance in the 18 areas we assess.

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](#). We welcome hearing from people and organisations who have experience of the regulators' work. We take this information into account

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<sup>1</sup> This figure includes 6,257 students.

<sup>2</sup> [Maximising the contribution of regulatory bodies' registers to public protection](#)

<sup>3</sup> The GOC collects EDI data for Council, Committee members and clinical advisors when they are appointed. Last year, it also started asking existing members and workers to complete an annual data return to capture year-on-year changes. This year's response rate to the annual return was 58.3%, lower than last year's 68.9% response rate.

<sup>4</sup> [Joint statement on zero-tolerance to bullying, harassment and discrimination at work](#)

<sup>5</sup> This work was primarily focused on the standards for dispensing opticians, optometrists and students as its separate work on a new model of business

alongside other evidence as we review the performance of each regulator.



### Quick links/find out more

- ▶ [Find out more about our performance review process](#)
- ▶ [Read the GOC's 2022/23 performance review](#)
- ▶ [Read our Standards of Good Regulation](#)
- ▶ [Read our new evidence framework for Standard 3](#)

### Professional Standards Authority for Health and Social Care

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regulation will involve a more detailed review of the *Standards for Optical Businesses*.

<sup>6</sup> [Statement on verification of contact lens specifications](#)

<sup>7</sup> [UK Optical Education report 2024](#)

<sup>8</sup> Including the Office for Students, Higher Education Funding Council for Wales, Health Education and Improvement Wales, NHS Education for Scotland and the chief national optometric advisers.

<sup>9</sup> [Information for education providers about the GOC's quality assurance processes](#)

<sup>10</sup> [Right-touch reform - a new framework for assurance of professions](#)

<sup>11</sup> [Section 13D of the Opticians Act 1989](#)