

COUNCIL

Standards strategic review: standards implementation

Meeting: 11 November 2015

Status: for noting

Lead responsibility:

Alistair Bridge, Director of Strategy

Council Champions:

Paul Carroll, Peter Douglas,
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Project manager:

Marcus Dye, Standards Manager

Project Board: SMT

Project team members: Simon Grier (Communications Manager), Angharad Jones (Policy Manager), Kiran Gill (Head of Legal Compliance), David Rowland (Head of Policy and Research)

Purpose

1. To update the Council on progress in implementing the new standards of practice for optometrists and dispensing opticians and standards for optical students.

Recommendations

2. It is recommended that Council notes the progress made in implementing the new standards and the planned next steps.

Strategic objective

3. Our Standards Strategic Review is a project in the 2014/15 Business Plan. This project supports the 2014-17 Strategic Plan objective of promoting higher standards across the optical professions.

Risks

4. We have established a project specific risk register to capture and monitor risks associated with this project. The risk register is reviewed at regular intervals by the project team and the SMT project board. The risks linked to implementation of the new standards are as follows:
 - 4.1 **Failure to take account of the patient voice, good regulatory practice, the outcomes of healthcare reviews, differences in the devolved nations and developments within the optical professions means that the content of the standards is either set too low or too high or does not apply to optical**

practice and is rejected by stakeholders. This is addressed through extensive research through the development phase, an extensive consultation to understand whether the standards would work in practice and what their impact will be;

- 4.2 **Lack of engagement with our stakeholders, particularly registrants, which may result in a lack of awareness of our new standards and these not being applied in practice.** This will require a wide-ranging programme of implementation to ensure that stakeholders are aware of the new standards and have the support they need to apply them. This is being addressed through our extensive consultation and implementation plans which aim to support stakeholders based on their specific needs, including communications, production of guidance and reviewing CET provision and requirements;
- 4.3 **Confusion over the role of the GOC in standards setting and how this relates to other organisations.** This is being addressed through clear communications about the standards framework in both the consultation and the implementation phases; and
- 4.4 **Delay between the production of the standards of practice and the standards for optical businesses leading to conflict between employers and employees.** Addressed through extensive consultation and changes to the Code of Conduct for business registrants so that it refers to the new standards of practice for individual registrants, prior to the development of new business standards.

Background

5. At its meeting in July 2015 the Council approved the publication of a standards framework to define our role in setting standards for individual registrants and new standards for optometrists, dispensing opticians and optical students following an extensive consultation with a range of stakeholders. The decision was taken after extensive consultation with our stakeholders – please refer to the Council papers from this meeting for further information:
<https://www.optical.org/download.cfm?docid=E13F85CE-9EB9-4452-90B55DFC DFA386AA>
6. Producing the standards is only the first part of ensuring that the GOC fulfils its statutory duties. The standards will not be effective unless registrants are both aware of them and are able to apply them in practice. This is reflected in the risk at paragraph 4.2.
7. The consultation began this process, but other activities will need to be undertaken to ensure that:
 - 7.1 all stakeholders are aware that the standards exist;
 - 7.2 registrants are able to apply the standards to their own role or situation;
 - 7.3 patients understand what to expect from their eyecare practitioners.

8. As evidenced by the feedback from the consultation, there is a lot of uncertainty within the optical professions over certain areas of practice and this will require the GOC to focus on implementation of the standards as one of its key activities over the next year.
9. In developing our implementation plan we have completed a stakeholder analysis which considers the needs of each stakeholder group (both internal and external to the GOC). It then goes on to consider ideas for activities to achieve these aims for each stakeholder group.
10. During September we sought the advice of our statutory advisory committees on communicating with specific stakeholders. The discussion at Registration Committee focussed on registrants and students; at Companies Committee we sought to understand how to engage with business registrants and other employers; at Education Committee we considered the needs of students and education providers; and at Standards Committee we looked in more depth at the supporting guidance for registrants that might be required. We have updated our standards implementation plan as a result of these discussions and this is provided at Annex 1.

Analysis

11. The work on implementation is currently prioritised to focus on four key areas:
 - 11.1 Publication and communication of the standards to stakeholders
 - 11.2 Development of guidance
 - 11.3 Implementation of the new CET regime
 - 11.4 Support for Fitness to Practise function

Publication and communication

12. Since the July Council we have:
 - 12.1 Produced a GOC response to the consultation available on our website: <https://www.optical.org/en/Standards/standards-strategic-review.cfm>, which reflects upon the feedback from the consultation and how we plan to act on this.
 - 12.2 Issued the new standards of practice for optometrists and dispensing opticians and standards for optical students via email to all our registrants and other stakeholders on 29 October 2015. These were accompanied by tailored emails for optometrists and dispensing opticians, optical students, training providers and others.
 - 12.3 Re-issued the revised Code of conduct for business registrants on 29 October 2015.
 - 12.4 Revised our website and published the above documents there.
 - 12.5 Had initial discussions with both optometry and dispensing optics training providers on the implications for accredited training courses and students

- 12.6 Prepared for issue hard copies of the standards in December as part of registration retention packs (mailings to students will be separate as they retain at a different time)
- 12.7 We have created a specific standards@optical.org email to support the implementation of the new standards.
- 12.8 We also plan to revise our 'What to expect of your optician document' in January 2016 for publication on 1 April 2016. This reflects the fact that up until 31 March 2016 the current Code of Conduct for individual registrants remains in effect and it may cause confusion if references are amended earlier than this.

Development of guidance

13. In our standards framework and our response to the consultation we stated that we will be producing supplementary material, such as guidance and case studies to help registrants understand how some of the standards apply in an optical context.
14. We have identified four priorities for guidance based on the consultation responses. These are consent, care and compassion, candour and the legal requirements that registrants must satisfy.
15. Draft versions of all of these documents have initially been discussed at the Standards Committee. It was agreed to convene a working group of professional members to consider the guidance further and particularly the level to which we can contextualise it for the optical profession. The working group will meet on 13 November 2015 to discuss the guidance further.

Implementation of a new CET regime

16. It is essential that all registrants, both students and fully-qualified familiarise themselves with the new standards. For fully-qualified registrants, we propose to use our CET Scheme as the mechanism by which registrants will be required to demonstrate they have engaged with the new standards.
17. To achieve this, for the next CET cycle beginning January 2016, there will be a requirement for all optometrists and dispensing opticians to undertake CET in a new Standards of Practice competency. The Standards of Practice competency will replace the existing Professional Conduct competency which will cease to exist on 31 December 2015. Current CET approved under the Professional Conduct competency will automatically transfer to the new cycle, but will expire at its current expiry date or 31 March, whichever is earliest. This coincides with the new standards taking effect.
18. When registrants log into the online CET system for the first time after 1 January 2016, they will have a learning goal automatically set for them against related to the Standards of Practice. This will have a non-CET requirement for them to read the

standards and make a declaration that they will abide by them from 1 April 2016. Throughout the cycle, on completion of any CET activity they will be asked whether they wish to link the activity to the Standards of Practice learning goal.

19. We have contacted CET providers and approvers to inform them of the change so that they can prepare in advance. Registrants will be contacted about the changes shortly.

Support for Fitness to Practise function

20. We have made initial plans to train our fitness to practise panel members, case examiners, investigation committee members and staff in November 2015. This will focus on the changes to the standards and how these can be applied by the various decision makers in the FTP process. We have engaged an external consultant, Sarah Ellson to support this training.
21. As a result of the consultation, it was clear that our Indicative Sanctions Guidance (ISG) would need to be revised to reflect the new standards. We expect the changes to be minimal, as the expectations in respect of registrants remain relatively unchanged, albeit with more detail being provided as to the ways in which a breach may occur. This is particularly relevant in respect of the standards relating to obtaining consent, safeguarding and whistle-blowing. The guidance will also reflect the additional specifically defined standard relating to candour.
22. As these changes may affect sanctions, we will be consulting on revised ISG. We intend to commence with the consultation in early December 2015. A workshop session on the revised ISG has been included in the fitness to practise panel training agenda on 25 November 2015 in order to garner the views of the panel. We will bring the document being consulted upon to Council in February 2016 for its views, following consideration by the Standards and Education Committees in January 2016.

Impact assessment

23. The following implications have been identified:
 - 23.1 GOC's reserves – none
 - 23.2 GOC budget – within project budget for 2015/16
 - 23.3 Legislation – none
 - 23.4 Resources – already included within current business plan for 2015/16, although there is a wider need for us to ensure that we have the level of resource and expertise needed to carry out our education and standards functions
 - 23.5 Equality, Diversity and Inclusion – standards must be accessible to all stakeholders – large text and Welsh versions are planned
 - 23.6 Human Rights Act – none
 - 23.7 Sustainability – none

Devolved nations

24. The project has previously considered the emerging differences in scopes of practice and delivery of healthcare services in each of the nations of the UK.
25. The following activities have allowed us to ensure our standards for individual registrants (optometrists, dispensing opticians and optical students) will be applicable to those practising in all parts of the UK:
- 25.1 differences in legal frameworks, contractual obligations and scopes of practice were identified during the development of the new standards for individual registrants;
 - 25.2 we pro-actively engaged with key stakeholders in the four nations in the consultation on individual standards for individual registrants; and
 - 25.3 we have specifically addressed those issues relating to the nations identified through our analysis of the feedback from the consultation in finalising the standards for individual registrants.
26. The implementation plan for the standards for individuals identifies specific activities to support the adoption of the new standards in all four nations.

Communications

27. Communication is a key element to the standards implementation plan at annex 1.

Timeline for future work

28. Key dates for Council to note are listed below:

Date	Action
13 November 2015	Standards working group to consider guidance documents.
1 January 2016	CET requirement relating to new standards comes into effect
1 April 2016	Implementation date for standards of practice for optometrists and dispensing opticians and standards for optical students and revised Code of Conduct for business registrants

Attachments

Annex 1 – Planned approach to implementation

Planned approach to implementation

Stakeholder category	Key messages/actions	Actions related to raising awareness	Actions related to ensuring understanding and application
<p>Patients and the Public</p>	<p>What is the role of the GOC</p> <p>Knowledge that optical professionals are registered and adhere to a set of standards.</p> <p>Understanding that patients have the ability to complain if the standards are not met.</p> <p>How to access the standards and complaints process when necessary.</p> <p>Difference in roles of the General Optical Council (GOC) and the Optical Consumer Complaints Service (OCCS).</p> <p>Enhanced awareness of specific standards relating to rights of complainants, compassionate care and candour.</p> <p>Low vision /children/young adults/parents – knowledge of specific scope of practice</p>	<p>Publication of standards on the GOC public website supported by specific information tailored towards patients.</p> <p>E-mail copies of standards to relevant patient organisations and everyone who responded to the consultation.</p> <p>Update patient information leaflets to include references to new standards, i.e. What to expect from your optician.</p> <p>Consider publicity material for GP surgeries and pharmacy practices.</p> <p>Consider more proactive activities with larger optical chains to raise awareness.</p>	<p>Work with professional associations, OCCS and insurers to produce a standardised complaints process</p> <p>Consider reviving previous GOC initiative on complaints posters for display in optical practices informing of right to complain to GOC/OCCS – (Standard 18).</p>

Stakeholder category	Key messages/actions	Actions related to raising awareness	Actions related to ensuring understanding and application
	requirements related to standards.		
Optometrists and dispensing opticians	<p>What is meant by ‘being registered’.</p> <p>Awareness that the standards have changed, where they can be found and when they come into effect.</p> <p>Understanding of what the standards are and how they apply to the work of the GOC</p> <p>Understanding of the changes to the standards and how this will affect practice.</p> <p>A clear understanding of some of the key parts of the Standards of Practice which may have previously caused concern or difficulty.</p> <p>Understanding options on applying professional judgement to different types of practice.</p>	<p>Access to standards: Send standards as a paper copy to all existing registrants at retention time. Students to receive student standards and optometrists and DOs to receive standards of practice.</p> <p>Ensure that all new registrants receive copy of appropriate standards in their registration pack.</p> <p>Ensure that when students convert to full practising status they receive a copy of the standards in their registration pack</p> <p>Communications Tag lines on email communications – counting down to publication/ implementation? Proactive email to all registrants on launch including link to relevant section of website.</p> <p>Articles in all optical press announcing launch</p>	<p>Confirmation of awareness Requirement in retention period for all registrants to sign declaration that they have read and abide by the standards of their profession.</p> <p>Supporting guidance Guidance documents produced by working group for:</p> <ul style="list-style-type: none"> • Candour • Consent • Care and compassion • Legal requirements <p>Other support such as CET, articles and signposting for:</p> <ul style="list-style-type: none"> • Whistleblowing • Safeguarding • Record keeping • Equality, diversity and inclusion <p>Media work and articles - articles focussed on different aspects of the standards or Guidance and how these are applied in practice. These could be rolled out throughout year, drawing on expertise within and outside of GOC.</p>

Stakeholder category	Key messages/actions	Actions related to raising awareness	Actions related to ensuring understanding and application
	<p>Understanding of standards that are new to healthcare in general and how they can be applied to the optical context.</p>	<p>Stands and presentation slots at all optical events during implementation period (2015-2016)</p> <p>Press release</p> <p>Podcast/video for website introducing the new standards</p> <p>Promotion by partner stakeholders including Local Optometric Committees</p> <p>Promotion on social media and consider Youtube account.</p> <p>Promotion through national conferences</p> <p>Promotion by members of advisory committees and Council</p> <p>Website: Standards to have own dedicated area of website with link from front page of main website with specific content aimed at registrants (potential for microsite?)</p>	<p>Production of supplementary guidance</p> <p>CET Requirement in new CET cycle to have read the standards and completed a specific module in professionalism.</p> <p>Developed further to have interactive links with supplemental guidance (internal and external) and e-learning (internal and external) as well as links to relevant websites.</p> <p>CET provider workshop to explore new standards and how CET will develop to accommodate.</p> <p>CET e-learning content developed by GOC to support key areas of the Standards and guidance.</p> <p>Access to advice Possible feedback forum to allow registrants to raise issues where further clarification is required.</p>

Stakeholder category	Key messages/actions	Actions related to raising awareness	Actions related to ensuring understanding and application
			Dedicated feedback form and/or email contact address (standards@optical.org)
Optometry and dispensing education and training providers	<p>To ensure that training providers are aware of the changes to the standards and how this affects their courses in terms of:</p> <ul style="list-style-type: none"> 6. Updated curricula 7. Updated learning outcomes 8. Updated assessments <p>To ensure that the training providers have mechanisms in place to ensure that all staff are made aware and receive further training in changes to standards, curricula, learning outcomes and assessment.</p>	<p>Email communication of the new standards and the requirement to update course documentation to reflect changes.</p> <p>Follow up in Optometry Heads meeting and DO equivalent.</p>	<p>Requirement to confirm updated course documentation in Annual monitoring report.</p> <p>Discussion of 'Professionalism' module as part of review of competencies to ensure that this is woven throughout course and not an add-on.</p> <p>Requirement to submit plan to train staff on changes as part of the Annual monitoring report.</p> <p>Update to GOC Accreditation Handbooks and other documentation</p>
Continuing Education and training providers	See actions relating to optometrists and dispensing opticians	See actions relating to optometrists and dispensing opticians	See actions relating to optometrists and dispensing opticians

Stakeholder category	Key messages/actions	Actions related to raising awareness	Actions related to ensuring understanding and application
<p>Optical students and graduates</p>	<p>Understanding of changes to the GOC standards and support for evaluating whether they meet new standards.</p> <p>To ensure a clear understanding of the change from the old standards to the new standards.</p>	<p>Access to standards: Send standards as a paper copy to all existing student registrants when new standards are launched.</p> <p>Ensure that all new student registrants receive copy of student standards in their registration pack.</p> <p>Ensure that when students convert to full practising status they receive a copy of the standards of practice in their registration pack</p> <p>Communications Tag lines on email communications – counting down to publication/ implementation?</p> <p>Proactive email to all registrants on launch including link to relevant section of website.</p> <p>GOC student roadshows to be updated to refer specifically to the new student standards and expectations of the GOC.</p> <p>Podcast/video aimed at students</p>	<p>Confirmation of awareness Requirement in retention period for all registrants to sign declaration that they have read and abide by the standards of their professions. Further consideration should be given to the use of technology in promoting the standards, including the possible use of mobile applications ('apps')</p>

Stakeholder category	Key messages/actions	Actions related to raising awareness	Actions related to ensuring understanding and application
		Further consideration should be given to the use of technology in promoting the standards, including the possible use of mobile applications ('apps')	
FTP decision makers	<p>Awareness of the new standards and when they take effect.</p> <p>Awareness of transition period from hearing complaints under old standards to hearing under new standards.</p> <p>How to apply the new standards to the various FTP roles, particularly assessing complaints and applying sanctions.</p>		<p>Decision on when implementation of new standards regime will occur for FTP</p> <p>Revision of FTP indicative sanctions guidance</p> <p>Consultation on changes to indicative sanctions guidance.</p> <p>Revision of internal processing guides and materials</p> <p>Revision of training materials for new appointments</p> <p>Training of all GOC staff</p> <p>Training of all FTP members</p> <p>Training of OCCS staff in ability to triage complaints</p>
Resources and Registration Directorate	Awareness of new standards and when they take effect.	Email communication and training for all registration staff on publication of new standards and the impact on registration department.	<p>Destroy all material referring to old versions of standards (retaining some for archive purposes)</p> <p>Restock new materials.</p>

Stakeholder category	Key messages/actions	Actions related to raising awareness	Actions related to ensuring understanding and application
	<p>Awareness of changes to registration process and materials</p>		<p>Update Registration internal process guides on new process for constructing registration packs for both students and fully qualified.</p> <p>Update registration forms to include declaration element related to standards.</p> <p>Update GOC roadshow talks with students.</p> <p>Update Non-UK assessment material and process.</p>
<p>Other GOC Staff and Governance structure</p>	<p>Awareness of the new standards, when they take effect.</p> <p>Awareness among non-executive members of content and supporting guidance.</p> <p>Awareness of transition plans for staff members.</p>		<p>Training of all existing GOC staff and non-executive members tailored to level of need.</p> <p>Inclusion of standards training in induction for new staff and non-executive members.</p>
<p>Optical Professional Associations/ societies</p>	<p>Awareness of the new standards</p> <p>Awareness of the role of the GOC in setting standards</p> <p>Awareness of the GOC's decisions on producing</p>	<p>Issue copies of finalised standards by email</p> <p>Offer to send paper copies for promotional purposes.</p> <p>Presentation at conferences</p>	

Stakeholder category	Key messages/actions	Actions related to raising awareness	Actions related to ensuring understanding and application
	<p>guidance to support the standards.</p> <p>Awareness of how the GOC standards and guidance fits with that of other organisations</p> <p>Identification of key parts of the standards that may have caused concern or problems for the members of the associations and societies</p> <p>Agreement for collaborative approach to communicating standards and guidance to ensure clarity and understanding within the professions.</p>	<p>Request for assistance in promoting new standards.</p>	
<p>Optical complaints bodies and insurers</p>	<p>Awareness of the new standards and guidance produced by the GOC</p> <p>Awareness of key aspects of the standards that may affect the work of these organisations, particularly</p> <ul style="list-style-type: none"> • Candour • Whistleblowing 	<p>Consideration of any specific feedback from the consultation process from these organisations</p> <p>Face to face meetings to discuss implications of new standards</p>	<p>Consideration of joint production of material on complaints which could be displayed in optical practices together with employers and professional associations</p>

Stakeholder category	Key messages/actions	Actions related to raising awareness	Actions related to ensuring understanding and application
	<ul style="list-style-type: none"> • Consent and communication • Complaints 		
<p>Other regulators / standards bodies</p>	<p>To share and promote our new standards and guidance with other regulators.</p> <p>To raise awareness with other regulators and organisations of the role of the GOC in setting standards.</p> <p>To ensure that other regulators or standards bodies that may interact with our registrants, e.g. Care Quality Commission or the NHS, understand what standards apply so as to minimise potential conflict with their own standards.</p> <p>To form collaborative partnerships with other regulators and standards bodies to promote consistent messages on professionalism that apply throughout healthcare and ensure clarity and understanding for our registrants.</p>	<p>To circulate finalised standards and guidance documents.</p>	<p>To meet with other healthcare regulators to discuss implementation activities that have worked well for them.</p> <p>To review websites and materials produced by other regulators to support implementation and consider in the optical context.</p>

Stakeholder category	Key messages/actions	Actions related to raising awareness	Actions related to ensuring understanding and application
	To promote the idea of collaborative care pathways between the professions and minimise the barriers which different and conflicting standards may pose.		
Government departments	To inform of work being undertaken. To promote engagement if possible.	To circulate finalised standards documents	