

Fit for the future

Strategic Plan 2020-2025

About us

The General Optical Council (GOC) is the UK-wide regulator for optometrists and dispensing opticians, and for optical businesses. We exist to protect the public by raising standards in the optical professions.

Our **Fit for the future** strategy for **2020-25** describes what we plan to do over the next six years to achieve our vision of being recognised for delivering world class regulation and excellent customer service.

Our mission is...

to protect the public by continuously raising standards in the optical professions

Our vision is...

to be recognised for delivering world class regulation and excellent customer service

Our values

The interests of patients and the general public are at the heart of all we do, and we aspire to the timeless seven (Nolan) public sector principles of public life (selflessness, integrity, objectivity, accountability, openness, honesty and leadership).

Our values underpin the way we work with each other, and with the public, our registrants and partner organisations:

We act with **integrity**

We pursue **excellence**

We **respect** other people and ideas

We show **empathy**

We behave **fairly**

We are **agile** and responsive to change

Looking back

Over the past five years we supported our registrants to deliver excellent eye care and to continuously improve, through:

Publishing revised **standards of practice** for optometrists and dispensing opticians and introducing standards for optical students.

Introducing a **duty of candour, guidance on consent** and supporting “**speaking up**” to underpin a culture of continuous improvement.

Publishing new **standards for optical businesses**, formalising our expectations and ensuring that they complement the standards for individual registrants.

Approving **new, innovative education provision** including four-year optometry masters’ programmes and laying the foundations for broader reform by launching and taking some key decisions regarding the Education Strategic Review (ESR).

Introducing new processes for dealing with **applications for registration** from both within and outside Europe.

Completing **two successful cycles of Continuing Education and Training (CET) and re-validation** with most registrants successfully re-registering and with an encouraging growth of reflective practice.

Improving **MyGOC** and **MyCET**, making them much more accessible and user friendly in response to feedback from registrants.

Applying new **acceptance criteria** for fitness to practise cases that ensure we only investigate those cases where there is a genuine fitness to practise concern.

Funding the **Optical Consumer Complaints Service** to deal with more low-level complaints that need resolution.

Providing new, improved **hearings facilities** following the relocation of our offices to the Old Bailey.

We have achieved this because of:

The energy and commitment of our focused and talented **staff**.

Sound advice from members of our **advisory committees** (Standards, Education, Registration and Companies).

The use of **expert advisory groups** on particular topics.

A newly established **business forum**.

Wider input from registrants through a new **consultation platform**.

Collaborating with **other regulators** to deliver greater efficiency and impact.

New challenges and opportunities

We are proud of what we have achieved but recognise there is more to do. Some examples of external influences that will affect our work include:

An **ageing population** and **new treatments** are driving greater demand for eye care services across the UK. Ophthalmology now represents more than eight per cent of all NHS outpatient attendances in England, the highest of any of the recorded specialities.¹ However, capacity to provide ophthalmology services has not grown quickly enough to meet demand, meaning that meeting patient needs is a real challenge. Optometrists and dispensing opticians have the potential to reduce the burden on the system if they can demonstrate the skills required by healthcare commissioners to offer more care in community settings.

Technological development that is changing the way optical professionals work, with optical coherence tomography (OCT) machines increasingly available in community practices and new developments in online/remote consultations and use of artificial intelligence. These changes will have the potential for both positive and negative impacts on patient care and the way it is delivered and the GOC will need to closely monitor how these developments may affect its regulatory work.

Increasingly **multi-disciplinary approaches** to patient care across the NHS and commissioned services.

Growth in **online and remote provision** of services and a **workforce** that seeks ever greater flexibility in their working hours and practices.

Changing business models as employers and businesses adapt to new technology and customer preferences.

Political and international developments such as the impact of Brexit may affect the way we regulate and deliver our strategic objectives.

There are some things we have started that need to be completed and embedded:

Redefining the **education requirements for new registrants** for the next decade and beyond through our Education Strategic Review (ESR) is an enormously important and complex piece of work that will enable us to maintain public protection as the roles of registrants evolve. Decisions on

¹ This data is available in the NHS Digital publication *Hospital Outpatient Activity 2018-19*:
<https://digital.nhs.uk/data-and-information/publications/statistical/hospital-outpatient-activity/2018-19>

some key elements of the new system have now been taken, with plans to move to the new system from 2022.

We are also planning significant changes to the **training and professional development** required for continuing registration, which will come into effect in 2022.

There are some things we know we can do better:

Completing **fitness to practise** cases more quickly is a key priority. We have a full programme of work to address this multi-faceted challenge and are excited by early signs of success. But this is a long-term project that will require continued focus.

Our communication with complainants, witnesses, registrants and providers is something we know we must improve. We need to put our customers centre stage and ensure that we are focused on the need to deliver benefits for patients and the wider public. This person-centred approach will include a more collaborative approach to regulation, with a greater emphasis on 'co-creation'. In doing so, we will promote a more positive, rounded perception of the GOC.

Sharing information and learning from our work, appropriately and more effectively (with registrants, across teams and with other regulators) can prevent public harm and reduce costs. We have begun this work in some areas but need to do more.

We have made some advances but need to go further in making our information more **accessible**, using modern technology and communicating in ways that the receivers of information from us prefer.

There are some big opportunities also:

Government has embarked upon a programme of regulatory reform to align the regulation underpinning different regulators as far as is feasible. It has said that it will prioritise regulation to strengthen governance and give greater flexibility in relation to fitness to practise proceedings, but it is also planning to go further and consider registration and education functions. Importantly for the GOC, they have also agreed to consider business regulation.

We have committed to greater collaborative working with **healthcare regulators**, not just to improve synergy and cost effectiveness, but to ensure

that by working together we achieve the greatest impact possible on public safety.

Looking forward

Strategic Objectives

Our priorities are organised under three overarching strategic objectives:

- delivering **world-class regulatory practice**;
- **transforming customer service**; and
- building a culture of **continuous improvement**.

Work programmes

For each year of the strategic plan we will publish a separate business plan setting out the specific milestones, outputs and outcomes that we plan to deliver. In this document, we have given an indication of the key work programmes that will be undertaken to deliver each of the strategic objectives and when they will occur over the five years of the strategic plan. The timelines are split into years (Yr) and quarters (Q) based on financial years, beginning Q1 April – June 2020.

We will also formally evaluate progress against the strategic plan after three years and consider whether we need to revise our priorities to reflect developments in the interim.

Equality, diversity and inclusion (EDI)

A diverse workforce can enrich and add value to an organisation, bringing benefits such as greater productivity, different perspectives, more creative ideas and improved relations with patients, the public and other customers.

Our EDI strategy for 2020-25 will focus on the same strategic objectives to ensure that there is complete alignment of our goals and we have drawn out some key aspects of our EDI strategy under each strategic objective.

We will also nominate an EDI lead who will work with the Senior Management Team to ensure that this work has a high profile and priority across the organisation. All projects will have an EDI strand and we will ensure that thinking about EDI is incorporated right from the very beginning, whether we are developing or revising policies and processes, or implementing legislation. This will involve carrying out and publishing impact assessments to ensure that we consider the impacts of our proposals on the full range of our stakeholders and potential stakeholders.

We will continue to publish EDI data on an annual basis and at the same time, will report on performance against our EDI strategy. In the meantime, we have set out

below our initial thinking on the ways in which our EDI strategy will dovetail with the delivery of our three strategic priorities.

Our Strategy

World-class regulatory practice

- **We will reform business regulation**, beginning with a review of our overarching regulatory approach and the balance between regulation of business and individuals. We will seek to better protect the public by introducing a comprehensive, simpler and more effective system of business regulation that covers all UK businesses providing eye care services and/or supplying spectacles or contact lenses where this must involve registered practitioners, and which promotes rather than hinders the growth of these businesses. As part of this work we will consider what powers are necessary to ensure compliance with our business standards, including the merit of seeking inspection powers in line with some other professional regulators.
- **We will consider what EDI information should be collected** from businesses as part of the registration process. We will also take steps to raise awareness among patients with disabilities of what they can reasonably expect from their eye-care provider.

| Work programme to support objectives | Start | Finish |
|--|---------|---------|
| Develop business case and secure agreement for legislative reform of business regulation | Yr 3 Q1 | Yr 4 Q3 |
| Implementation of new business regulation regime | Yr 4 Q4 | Yr 5 Q4 |

- **We will revise our standards for individuals** – optometrists, dispensing opticians and students – in order to ensure continued public protection, taking opportunities to harmonise standards across the different healthcare professions likely to work together as part of multi-disciplinary teams. As part of this work, we will continue to issue additional guidance as and when needed.
- **In revising our standards for individual practitioners**, we will review our expectations of how registrants deliver safe and accessible care for all.

| Work programme to support objectives | Start | Finish |
|---|---------|---------|
| Develop guidance on 'speaking up' for registrants | Yr 1 Q1 | Yr 1 Q4 |
| Publish and implement guidance on 'speaking up' for registrants | Yr 2 Q1 | Yr 2 Q4 |
| Develop and consult on new standards of practice for individuals | Yr 2 Q1 | Yr 3 Q3 |
| Publication and implementation of new standards of practice for individuals | Yr 3 Q4 | Yr 4 Q4 |

- **We will introduce a new system of education standards, outcomes and quality assurance**, to ensure that the skills and abilities of our registrants remain up to date and in line with the needs of the healthcare system. This will involve consideration of both pre- and post- registration needs.
- **In implementing new education standards, outcomes and quality assurance procedures** we will continue to conduct impact assessments and will incorporate a new section on EDI in our handbook for education providers.

| Work programme to support objectives | Start | Finish |
|--|---------|---------|
| Development and consultation on outcomes and standards for education and new quality assurance scheme | Yr 1 Q1 | Yr 1 Q3 |
| Implementation of learning outcomes, standards for education delivery and new quality assurance scheme | Yr 1 Q3 | Yr 3 Q1 |
| Review and implement any changes to non-UK registration scheme resulting from outcomes of Brexit negotiations and change to education scheme | Y1 Q1 | Yr 2 Q3 |

| | | |
|---|---------|-------------------------|
| Launch of new quality assurance scheme and acceptance of applications for qualification approvals | Yr 2 Q4 | |
| Transition period for all qualifications to move to new quality assurance scheme | Yr 2 Q4 | Yr 5 and beyond to 2028 |

- **We will introduce new continuing professional development (CPD) requirements** with a continued focus on re-validation but with more flexibility for registrants to reflect on their own learning needs and to undertake learning in line with their own career goals, including specialisation if appropriate. We will aim to phase in the reforms over the next three years, prioritising the shift to our *Standards of practice for optometrists and dispensing opticians* underpinning the new CPD system.
- **In our introduction of new CET requirements** and the associated development of the MyCET online website we will review the way we deal with exceptional circumstances, often related to maternity, illness or disability.

| Work programme to support objectives | Start | Finish |
|---|---------|---------|
| Development and consultation on new CPD scheme, including proposed introduction of reflective practice requirement and move to <i>Standards of practice</i> | Yr 1 Q1 | Yr 1 Q3 |
| Implementation of new CPD scheme | Yr 1 Q4 | Yr 2 Q3 |
| Launch new CPD scheme | Yr 2 Q4 | Yr 5 Q3 |

- **We will implement new legislation**, once this is enacted, to establish a unitary board and will consult on how to exercise new powers that the board will have to set rules in all parts of our regulatory activity. Wherever possible we will do this jointly with other regulators to develop greater coherence and to benefit from one-another's different experiences. Will also ensure that we

gain appropriate expert input, building on our recently established Advisory Panel, which brings together all our advisory committees.

| Work programme to support objectives | Start | Yr 2 Q |
|---|--------------|---------------|
| Implementation of government reforms to the governance of GOC | Yr 1 Q1 | Yr 2 Q |
| Implementation of government reforms to the fitness to practice process | Yr 1 Q1 | |
| CPD scheme underpinning legislation | Yr 1 Q1 | Yr 2 Q3 |
| Legislation to support new business regulation model | Yr 3 Q1 | Yr 4 Q3 |
| Review of student registration | Yr 4 Q2 | Yr 5 Q4 |
| Brexit plan preparation and implementation | Yr 1 Q1 | Yr 1 Q4 |

Transforming Customer Service

- **We will develop a customer service strategy** to make it easier for patients, the public, registrants and other customers to work with us. This will include developing our relationships with internal and external stakeholders and working in partnership with specialist organisations where appropriate.
- **In developing our customer engagement strategy** we will consider the needs of patients, the public and other customers, particularly those who may be more vulnerable or where we need to provide appropriate mechanisms to engage them because of physical or other barriers.

| Work programme to support objectives | Start | Finish |
|--|--------------|---------------|
| Review, development and launch of a new public website | Yr 1 Q1 | Yr 1 Q2 |

| | | |
|--|--------|-------|
| Development and launch of new MyGOC website for registrants based on Microsoft 365 | Y1 Q2 | Y1 Q4 |
| Revised communications strategy | Yr1 Q2 | Yr2 |

- **We will address our long-standing issues with timeliness in fitness to practise**, taking advantage of the opportunities new legislation will provide and utilising opportunities for developing new rules and approaches jointly with other regulators.

| Work programme to support objectives | Start | Finish |
|---|---------|---------|
| Develop and implement improved FTP case management system | Yr 1 Q1 | Yr 2 Q1 |
| Delivery of average 78-week timescale for processing of FTP cases | Yr 1 Q1 | Yr 1 Q4 |
| Review and implement improvements to end to end timescales for processing FTP cases following implementation of revised FTP rules | Yr 4 | Yr 5 |

- **We will review and modernise all our processes** applying 'lean' methodologies where appropriate to make best use of resources, maximise efficiency and ensure value for money.
- **In reviewing and modernising our processes**, we will explore why it is that some groups of registrants are more likely than others to progress to formal proceedings when a complaint is raised with us and take further action as appropriate.

| Work programme to support objectives | Start | Finish |
|--|---------|---------|
| Review and implement new illegal practice strategy | Yr 1 Q1 | Yr 2 Q4 |

| | | |
|---|---------|---------|
| Project to automate registration processes | Yr 1 | Yr 2 |
| Research into impact of GOC FTP processes on different groups of registrants | Yr 1 Q4 | Yr 2 Q4 |
| Review, develop and implement new processes for presenting GOC FTP cases (advocacy) | Yr 1 Q2 | Yr 4 Q2 |

- **We will develop a learning culture** to ensure that risks, issues and good practice identified through our regulatory work are fed back into all parts of the organisation. We will achieve this by better collection and analysis of our own data and that of others, for example, learning from our fitness to practise cases, whether they progress to a hearing or not, can inform our standards and guidance and professional development. We will also share this learning proactively with registrants and their representative bodies in order to prevent public harm, including through a new regular learning bulletin.
- **In our development of a learning culture**, we will ensure that we are able to capture and share learning of the impacts of our role on those with different protected characteristics², including where there are specific impacts related to intersectionality³

² It is against the law to discriminate against someone because of:

- [age](#)
- [disability](#)
- [gender reassignment](#)
- [marriage and civil partnership](#)
- [pregnancy and maternity](#)
- [race](#)
- [religion or belief](#)
- [sex](#)
- [sexual orientation](#)

These are called protected characteristics.

³ the theory that the overlap of various social identities, such as race, gender, sexuality, and class, contributes to the specific type of systemic oppression and discrimination experienced by an individual

| Work programme to support objectives | Start | Finish |
|---|---------|---------|
| New FTP learning bulletin developed and introduced | Yr 1 Q1 | Yr 1 Q2 |
| Improve recording, analysis and sharing of FTP data | Yr 1 Q1 | Yr 2 Q4 |

Continuous improvement

- We will complete the investment in our IT infrastructure.** IT forms the foundations for everything we do and over the last two years we have made significant investment in IT to improve the GOC's infrastructure, resilience and security. We will complete this journey by giving the GOC a business platform centred on the cloud-based Microsoft Office 365. From this our Customer Relationship Management (CRM) systems will be developed to deliver working practice improvements and efficiencies, ensuring that we continue to keep information safe and secure and that our staff's time is focused on value-added activities.
- In completing the investment in our IT infrastructure,** we will ensure accessibility of our new website, with a primary focus on those with sight impairment and we will continue the work we have begun to capture more and better data on a wider range of protected characteristics to help inform and shape our regulatory work

| Work programme to support objectives | Start | Finish |
|--|---------|---------|
| Implement SharePoint 365 for document management including the migration of existing file storage to this platform | Yr 1 Q1 | Yr 1 Q4 |
| Upgrade our CRM system to Microsoft Dynamics 365 cloud | Yr 1 Q1 | Yr 1 Q4 |

| | | |
|---|---------|---------|
| Introduce additional cyber security measures including 2-factor authentication for staff. | Yr 1 Q1 | Yr 1 Q2 |
| New secure portal to share information with external parties involved in FTP, registration and education processes as well as those members on Council and committees | Yr 2 | Yr 5 |
| Development of CRM to support regulatory functions | Yr 2 Q1 | Yr 5 Q4 |
| Archive management project to reduce historic paper records | Yr 1 Q1 | Y2 |
| Review of data collection on protected characteristics to better inform regulatory policy and impacts | Yr 2 | Yr 4 |

- **We will develop and implement a people plan** to make the GOC a great place to work. The GOC's IT will enable its staff to work in an agile and flexible way, providing staff with a more positive work life balance. This will be supported by the ongoing work to modernise our human resources policies, with continued well-being initiatives and learning, training and development programmes to recruit and retain our talented staff. Looking further ahead, the break in our office lease in 2025 will enable us to identify the best environment and location from which our staff can carry out our functions for the benefit of our registrants, patients and the general public.
- **In developing and implementing our people plan**, we will demonstrate our commitment to EDI by implementing an EDI Leadership Plan and other recommendations arising from our EDI Review.

| Work programme to support objectives | Start | Finish |
|---|---------|---------|
| Staff engagement plan developed and implemented | Yr 1 Q1 | Yr 1 Q4 |

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|---|---------|---------|
| Develop and roll-out of three year management development programme | Yr 2 Q1 | Yr 5 |
| EDI training for all staff with enhanced training for managers | Yr 1 Q1 | Yr 1 Q4 |
| Review of IT resources including printers, laptops, internet and phones | Yr 1 | Yr 1 |
| Review of GOC premises and working environment | Yr 3 Q1 | Y5 |
| HR policy review project | Yr 1 | Yr 3 |

- **We will deliver and embed our efficiency programme** to maximise value for money and fund the new things we want to do without asking for more funds from our registrants. This will include seeking process improvements across the organisation, ensuring we reach the financial break-even point by 2021-22 and continue to operate within our annual income thereafter.
- **EDI: In delivering and embedding our efficiency programme**, we will maximise our chances of success and avoid wasted costs by ensuring that those requiring reasonable adjustments to participate in our processes are given the right support at the right time.

| Work programme to support objectives | Start | Finish |
|---|--------------|---------------|
| Development and implementation of 'paperless' hearings procedures | Yr 1 Q1 | Yr 2 Q3 |
| Pilot and introduce virtual/remote hearings processes | Yr 3 Q1 | Yr 4 |
| Implement outcomes of review of centralised enquiries team to provide improved customer support | Yr 1 Q1 | Yr 1 Q4 |
| Review of internal banking and accounting procedures | Yr 2 Q1 | Yr 4 Q4 |

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|--|---------|---------|
| Review of internal business planning and budgeting processes | Yr 1 Q1 | Yr 1 Q4 |
|--|---------|---------|

What will success look like?

We will measure our success through the following high-level outcomes:

- In aspiring to be world-class we should be rated highly by the **Professional Standards Authority (PSA)**. We will aim to meet all PSA standards but will not let this get in the way of trying new and innovative approaches to regulation.
- **Public confidence** in the professions we regulate is already strong and we expect this to be maintained if we are continuously raising standards. By protecting the public, we are also protecting the reputation of the optical professions. We have instigated an annual public perceptions survey and will continue this throughout the period of this plan.
- We should also retain the **confidence of the optical professions** and we will measure this through an annual registrants' survey and regular stakeholder survey, looking, for example, at the extent to which we follow our values including behaving fairly, acting with integrity and pursuing excellence.
- We expect **customer satisfaction** with the GOC to increase if we deliver on our customer engagement strategy. We do not have a robust baseline and will prioritise the development of this in year one, with an emphasis on patients, the public and registrants.

These high-level outcomes will be underpinned by a range of output measures set out in our more annual business plans. These will be aligned to the measures used by the PSA and importantly, the things that matter to patients and the wider public, and to our customers and stakeholders more generally.