

Strategic Plan 2020-2026

Meeting: 13 November 2019

Status: For decision

Lead responsibility and paper author: Lesley Longstone (CEO & Registrar)

Council Lead(s): Gareth Hadley and David Parkins

Purpose

1. To enable Council to consider a draft strategic plan prior to further consultation with the sector.

Recommendations

2. Council is asked to:
 - provide feedback on the strategic plan;
 - agree the strategic plan for 2020-26 should be issued for full public consultation; and
 - delegate authority to the Chair and CEO/Registrar to finalise the strategic plan for consultation, reflecting comments from Council.

Strategic objective

3. This work contributes towards the achievement of the following strategic objective: organisational transformation and will form the basis for our new strategic objectives from 2020. The development of a new strategy is included in our 2019/20 Business Plan.

Background

4. Over the past year, staff and Council have had a number of opportunities in small and larger group sessions, to feed into the development of our next Strategic Plan. This final draft captures earlier feedback related to mission, vision and values and develops the strategic priorities going forward in more detail.
5. It also includes, for the first time, our EDI strategy. Historically this has formed a separate document, but there is support for incorporating this into our over-arching strategy to ensure that it remains centre stage and that there is strong coherence with other aspects of our plans.

Analysis

6. Our **mission statement “to protect the public by continually raising standards of practice in the optical professions”** reflects the statutory purpose of the GOC

and the fact that we impact on public safety through raising standards within the professions we regulate. The word “continually” was added following feedback from our Advisory Panel who felt that without, it could be read negatively, as if standards were not already high. We feel that this new wording is a better reflection of what we believe to be the case, i.e. that standards are high, but that the professions need to continuously improve to ensure that they remain high in an environment of rapidly changing technology, an evolving commissioning landscape and increasing customer service expectations.

7. Our **vision statement “to be recognised for delivering world class regulation and excellent customer service”** sets a high benchmark for what we need to do “world class regulation” but also how we do it with “excellent customer service”. The stakeholders that we have spoken to about our strategy were keen to know whether “customers” included registrants and that is certainly our intention. In developing our customer service, we will be thinking not just about members of the public with whom we interact, but about all of our registrants whether our contact with them is part of the registration or CET process, or whether it is through our fitness to practice investigations.
8. Our **values: integrity, excellence, respect, empathy and fairness** have been developed through extensive consultation with staff and for each we have drilled down into the behaviours that we expect. When we last discussed the values with Council you asked us to think about how the values would apply externally. We are proposing to ask exactly that question as part of our consultation. *If the GOC were living these values, what would good look like from your perspective?* We will use the behaviours identified, internally and externally to help design our 360-feedback exercise.
9. Our **looking back** section identifies some headline achievements over the past five years, while not seeking to replicate the detail of our annual reports. But it also aims to recognise the part that others have played in helping us achieve the things we have. Your feedback on whether we have recognised the right things would be helpful.
10. The section on **new challenges and opportunities**, summarises the output of our work over the past year to reflect on what we do well and less well (strengths and weaknesses) and to look further afield at changes that are happening in our environment (opportunities and threats). Again, this is not comprehensive but seeks to bring out the key considerations going forward. Have we identified the right things or are there others you would want us to pull out?
11. **Looking forward** organises our key priorities under three strategic aims: **delivering world-class regulatory practice, transforming customer service and embedding continuous improvement**. These are high level aims that all staff can relate to and are the same broad headings as discussed with Council previously.

The wording has been changed however, in response to feedback from our Leadership Team that they wanted us to be more ambitious.

12. The detail that sits beneath the three aims is short and punchy, rather than an attempt to catalogue everything that we intend to do. Here too we have made some amendments to what Council has seen previously, to ensure that our forward work programme is suitably stretching and able to be applied to many different parts of the GOC in equal measure.
13. This is the first time that Council have seen our **EDI Strategy**, which responds to the findings of our latest EDI report and issues that we know we need to address. Because of the short time frame between these two events, this is more provisional than other sections. Between now and publication of the draft for consultation, it will be necessary to do some further work within teams to ensure that we are focussing on the right things and have staff buy-in to do so.

Finance

14. There is a trade-off of course between ambition and timeframe and cost. At the same time as encouraging us to aim high, staff have been equally clear in pointing out the challenge of running several important change programmes simultaneously. The scheduling of this work over the next five or six years will be key and the final version of the plan to come to Council in February will include a high-level plan with associated costs, and choices should further prioritisation become necessary.

Risks

15. There is a risk that the strategic plan is not well aligned with the needs of the organisation or sector. This has been mitigated through the extensive research related to risk and changes in our environment that has fed into the development of the plan and through input from our Advisory panel and other stakeholders. It will be further mitigated through wide consultation with the sector.
16. There is a risk that we try to do too much and end up not doing anything well. We will mitigate this through the consultation and planning phase between now and February. If it becomes necessary, we will offer Council options regarding priorities for the years ahead. Beyond then, we will need to remain sufficiently agile to deal with changing circumstances and potentially priorities.
17. There is a risk of several change initiatives competing for the same resources and/or time of staff with pressing operational delivery goals. This will be mitigated through applying a more rigorous approach to project planning including recognising the interdependencies with other projects and the reliance on contributions from other teams.

Equality Impacts

18. As this is not a new policy or process, an impact assessment has not been completed. However, the Equality Strategy forms a part of this work and the proposals are designed to improve our compliance with equalities legislation and more broadly, to ensure that we meet the needs of all our different registrants and staff, whatever their characteristics.

Devolved nations

19. The devolved nations have very different contexts and awareness of that will be important in driving forward particular initiatives. To ensure that we are sufficiently close to all nations, we have begun to establish regular fora bringing together the regulatory leads and professional leads for all nations. They will be important opportunities to ensure that our strategy and successive business plans reflect the needs across the whole of the UK.

Other Impacts

20. Once the strategy is approved, other impacts will be considered in working up detailed project plans for the different areas of work.

Communications

External communications

21. Our proposal is to consult on the draft strategy over December and January through our consultation website.

Internal communications

22. We will continue to discuss the strategy with staff and develop further detail.

Next steps

23. A final version of the strategy will come to Council in February alongside a Business Plan for year one of the strategy.

Attachments

Annex one: Draft 2020-26 Strategy

GOC Strategy 2020-2026

About us

The General Optical Council is the UK wide regulator for Optometrists and Dispensing Opticians, along with students and optical businesses. We exist to protect the public by raising standards of practice in the optical professions.

Our “Future in Focus” strategy for 2020-26 describes what we plan to do over the next 6 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 continually raising standards of practice in the optical professions

Our vision is...
to be recognised for delivering world class regulation and excellent customer service

Our values

The interests of 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 & leadership).

Our values underpin the way we work with each other, 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**

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**” through our work on standards 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 4-year MOptoms and laid 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 rounds of 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 ensures 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 never-the-less need resolution.

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

We've achieved this because of:

The energy and commitment of our 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're proud of what we have achieved but also recognise that there is more to do.

External influences that will affect our work include:

An **ageing population** driving greater demand for eye care services across the UK. One indicator of this is that ophthalmology now represents more than 8 per cent of all NHS outpatient attendances in England, the highest of any of the recorded specialities.¹

Technological development that is changing the way optical professionals work, with OCT machines increasingly available in High Street practices and new developments in remote consultations and use of artificial intelligence.

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.

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

Redefining the **education requirements for new registrants** for a decade to come has been an enormously important piece of work. Decisions on key elements of the new system have now been taken [with plans to shift to the new system by 2024].

Significant changes to **training and professional development** required for continuing registration have also been agreed to 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.

Listening and Communicating with complainants, witnesses, registrants, providers is something we know we must improve. Work has started in some pockets of the organisation, but we need to bring customer focus centre stage in all our work.

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>

Sharing information and learning from our work, appropriately and more effectively (with registrants, across teams and with other regulators) can improve public safety 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 is embarked upon a programme of regulatory reform, aligning 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.

Health care regulators have committed to greater collaborative working, 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

To achieve our ambition of delivering and being seen to deliver world-class regulation we need to address current weaknesses and maximise opportunities for change. Our priorities are organised under three overarching strategic objectives: delivering world-class regulatory practice; transforming customer service and building a process of continuous improvement.

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 close gaps in our ability to protect the public, seeking new legislation if necessary, while creating a level playing field and ensuring that as a regulator we promote, rather than hinder growth. As part of this work we will consider the merit of seeking inspection powers in line with some other professional regulators.

We will revise our standards for individuals – optometrists, dispensing opticians and students – taking opportunities to harmonise standards across different health professions likely to work together as part of multi-disciplinary teams. As part of this work, we will issue additional guidance as and when needed.

We will implement new Education Standards and Learning Outcomes

flowing from the Education Strategic Review. This work will include supporting new and existing providers to transition to new arrangements and sharing the learning that comes from early adopters' experiences.

We will introduce new CPD requirements with a continued focus on a small core of learning required for re-validation but 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.

Improving Customer Service

We will review all our processes applying LEAN where appropriate to address our long-standing issues with timeliness, particularly in the fitness to practise arena, taking advantage of the opportunities new legislation will provide and maximising opportunities for developing new rules and approaches jointly with other regulators.

We will develop a Customer Engagement Strategy to make it easier for members of the public, registrants, partners and stakeholders to work with us. This will include creating more opportunities to hear from patients and organisations that represent them.

We will develop a learning loop to ensure that risks and issues identified through our regulatory work are fed back into all parts of the organisation. Learning from our fitness to practise cases for example, whether they progress to a hearing or not, can be better used to inform standards and guidance and to shape continuing training provision. We will also share that learning more broadly through a new *Learning the Lessons* bulletin.

Continually improving

We will implement new legislation, once enacted, establishing a Unitary Board and building on our recently established Advisory Panel, which brings together all our advisory committees. We 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.

We will develop our infrastructure, including our IT, to enable us to effectively deliver our other strategic priorities, ensuring that we continue to keep information safe and secure and that our staff's time is focussed on value-added activities.

We will deliver our efficiency programme to fund the new things we want to do, without asking for more funds from our registrants. This will include ensuring we get good value for money when we reach the break-point of our premises lease in 2025.

We will develop and implement a People Plan to make the GOC a great place to work. This plan will incorporate existing work on our HR policies along with well-being, support for staff, training & development and agile working.

Equality, Diversity & Inclusion (EDI)

Our EDI strategy for 2020-26 will focus on the same strategic priorities to ensure that there is complete alignment of our goals. All projects will have an EDI strand to ensure that thinking about EDI is incorporated right from the very beginning. We will also nominate an EDI lead who will work with the Senior Management Team to ensure that this work has sufficient profile and priority across the organisation.

World Class Regulatory Practice

In our reform of business regulation, 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 customers with disabilities of what they can reasonably expect from their eye-care provider.

In our revision of standards for individual practitioners, we will review our expectations in relation to the way registrants meet their EDI obligations.

In our implementation of new Education Standards and Learning Outcomes, we will continue to conduct impact assessments and will incorporate a new section on EDI in our provider handbook.

In our introduction of new CET requirements and the associated development of MyCET we will review the way we deal with exceptional circumstances, often related to maternity or illness / disability.

Improving Customer Service

In our review of processes, we will try to understand why it is that some groups of registrants are more likely than others to progress to more formal proceedings when a complaint is raised with us and take further action as appropriate.

In development of our Customer Engagement Strategy, we will consider the needs of all our customers, particularly those who may be more vulnerable, and provide appropriate mechanisms to engage them.

In our development of a learning loop, we will ensure that we are able to capture and share learning for those with protected characteristics, focussing on intersectionality as well as registrants as a whole.

Continually improving

In our implementation of new legislation, we will ensure that impact assessments are undertaken and published as new rules and procedures are developed.

In development of our IT infrastructure, we will ensure accessibility of our new web-site, with a primary focus on those with sight impairment and we will continue the work we have begun to capture more and better equalities data for a wider range of characteristics and processes.

In delivery of our efficiency programme, we will look at ways to avoid wasted costs by ensuring that those requiring reasonable adjustments to participate in our processes are given the right support at the right time.

In the development and implementation of our People Plan, we will implement our EDI Leadership Plan and other recommendations arising from our EDI Review.

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 of the PSA standards but will not let this get in the way of trying new and innovative approaches to regulation.
- The overall **level of complaints** that come to us should fall if we are successful in continually raising overall standards. This will not prevent us from being proactive in helping people understand how to make a complaint if they need to. We will prioritise this activity early on so that we have a good baseline to measure improvements against.
- **Public confidence** in the professions we regulate should rise if we are continually raising standards. By protecting the public, we are also protecting the reputation of the regulated professions. We have instigated an annual public perceptions survey and will continue this throughout the period of this plan.

- **Customer satisfaction** with the GOC should 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.

These high-level outcomes will be underpinned by a range of output measures, set out in our more detailed Business Plans, aligned to the measures used by the PSA and importantly, the things that matter to our customers.