



Fit for the Future: Lifelong Learning Review Continuing Education and Training Consultation

Final report

General Optical Council

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Executive summary

Introduction

The General Optical Council (GOC), in its role as the UK regulator of optometrists, dispensing opticians, student opticians and optical businesses, has the remit to oversee a mandatory scheme of continuing education and training (CET). The GOC is reviewing the current CET scheme, introduced in 2013, as the optical sector has changed since then and the work optometrists and dispensing opticians carry out has expanded and diversified.

As part of this review, Enventure Research, an independent research agency, was commissioned by the GOC to undertake analysis of data collected via the ‘Fit for the Future: Lifelong Learning Review’ public consultation. The consultation explored stakeholder views on the existing CET scheme and how it can evolve to meet the challenges of the future.

An online survey designed to be completed by individuals and organisations was created by the GOC to collect responses to the consultation, utilising the Citizen Space consultation platform. During an eight-week timeframe, 994 responses were received from 973 individuals and 21 organisations.

Enventure Research was commissioned by the GOC to conduct independent analysis of the consultation data. This executive summary presents the key findings. Colour-coded verbatim quotations from open-ended survey questions have been included as examples (**blue** responses are from optometrists, **green** responses are from dispensing opticians, and **red** responses are from organisations).

Views and understanding of the current CET scheme

Attitudes towards the current CET scheme

The GOC asked stakeholders for their views on the current CET scheme. Overall, the feedback was generally positive, with the majority of respondents agreeing that the current CET scheme:

- Allows registrants to develop their skills and knowledge in order to keep pace with changes that are happening in the optical sector (78%)
- Allows registrants the flexibility to undertake CET in relation to their individual scope of practice (73%)
- Helps encourage professional development (73%)
- Helps improve registrants’ practice (76%)
- Helps keep registrants up to date with good practice (82%)
- Helps registrants plug gaps in their knowledge (77%)

By contrast, a smaller majority (56%) agreed that the current scheme helps to build and maintain public trust and confidence in the optical professions.

Organisational responses were less positive when reviewing some areas of the current CET scheme. For example, nine of 17 organisations disagreed that the current scheme allows registrants the flexibility to undertake CET in relation to their individual scope of practice, and seven of 17 disagreed that the current scheme helps encourage professional development.

Understanding risks in the optical sector and the role of revalidation

The most commonly perceived riskiest areas of work carried out by optometrists and dispensing opticians were within the clinical risk category, including the detection of disease/missed pathology (25%), emergencies/identifying and managing eye disease (17%), optometrists offering a wider range of services (16%) and referrals/triaging (13%).

Optometrist respondents were more likely to suggest clinical risks, whereas a larger proportion of dispensing opticians suggested conduct risks, such as risk of complaints/litigation and communication.

Similar proportions of respondents commented to say that CET goes some way to address these risks or provides relevant information, or that CET does not address these risks or do enough to support registrants, highlighting that opinion is divided.

Almost three in five respondents (58%) thought there is a risk that optometrists and dispensing opticians may be de-skilling (i.e. losing skills and knowledge in some areas of practice), including 15 out of 18 organisations. Additional comments provided highlight concerns about technology and automation causing de-skilling in areas such as retinoscopy and refraction, and loss of skills in areas not frequently used in daily practice, such as contact lenses and fitting or dispensing.

If registrants do not see many contact lens patients... undertaking one or two hours of CET...will not replace lack of experience and could give a false sense of security. **Directorate of Optometric Continuing Education and Training**

However, smaller proportions of respondents commented that they perceived registrants to be more skilled than ever, that certain skills were being replaced because they were out of date, and that the CET scheme is designed to prevent de-skilling.

The majority of respondents (86%) said that there are core areas of practice that optometrists and dispensing opticians should keep their skills and knowledge up to date in, including 15 out of 18 organisations. The most commonly suggested areas were pathology/ocular disease and developments in technology/products. A large proportion of respondents also suggested that all areas were relevant, rather than singling out specific areas.

Lifelong learning and reflection

The GOC wants to promote the concepts of lifelong learning and reflection within their CET scheme. They asked stakeholders for their views on how well these concepts currently work and what further support they could provide in future to support registrants in embedding a culture of reflective practice.

Two-thirds of respondents (68%) agreed that the GOC's current CET scheme intends to promote and embed a culture of lifelong learning and encourages registrants to reflect on their practice. However, seven of 17 organisations disagreed with this statement. Comments in relation to this statement mostly detailed problems with the current CET scheme or suggestions for improvements, including a number who felt that the current scheme was perceived by many registrants as a 'box-ticking' exercise.

A similar proportion (64%) also agreed that the name of the current scheme, 'Continuing Education and Training', helps to promote a culture of lifelong learning and reflection. However, only nine out of 16 organisations disagreed with this, and a significant proportion of additional comments suggested that the name 'continuing professional development' would be more appropriate, particularly given that this term is widely used in other healthcare professions.

Opinion was divided between those who said that the GOC's tools for registrants to help them reflect on their practice were helpful (44%) and those who said they were not (44%). Just five of 17 organisations said that these tools were helpful. Further feedback from respondents focused more on negatives, suggesting the tools were not helpful and showed a lack of trust in registrants, and that reflection was a waste of time or a box-ticking exercise. A smaller number of comments, however, were more positive about reflection in general and the tools available.

A lack of clarity around the concept of reflection and the benefits (63%) was perceived to be the most significant barrier making it difficult for optometrists and dispensing opticians to reflect on their practice. Similar proportions of respondents also said that a lack of guidance or support (56%) and a fear of being open and honest about where improvements could be made (57%) were also barriers to reflective practice. This result was reinforced by the proportion of additional comments relating to registrants' fear of the consequences when admitting mistakes or gaps in their knowledge, or that more guidance was needed to overcome barriers to reflective practice.

The term 'Continuing Education and Training' is not wholly fit for purpose...the term 'Continuing Professional Development' comes closer to describing a culture of learning and improvement through a registrant's professional career.
Optometry Northern Ireland

From my own experience, and speaking to other colleagues, it tends to be a tick box exercise that we do. Some aspects are good, but there needs to be a different method of reflecting instead.
Optometrist

Many people might be afraid of being open & honest if they felt their skill set was below par for fear of being disciplined by the regulator as it is them who monitor & maintain the current CET system.

Dispensing optician

The most popular suggestions for what the GOC could do to support registrants in embedding a culture of reflective practice were having clear guidance, structure and regulation, having more peer reviews, meetings and mentoring opportunities, and providing more accessible

learning opportunities. A small proportion of comments suggested that the GOC should do nothing, as reflective practice was seen as the personal responsibility of the registrant.

*The GOC could achieve this both through the CETs, emphasising the need to regularly discuss and reflect on incidents, lessons learnt and good practice, as well as providing supportive forums to do so, either through events or conferences or online. **The Royal College of Ophthalmologists***

Views on the proposed changes to the CET scheme

Giving registrants more control over their learning and development

The GOC is proposing to link CET requirements to more high-level learning outcomes based on their *Standards of Practice for Optometrists and Dispensing Opticians*. This approach would be consistent with the learning outcomes the GOC are developing through the Education Strategic Review for education prior to joining the register.

Three-quarters of respondents (74%) agreed with the GOC's proposed approach of giving optometrists and dispensing opticians more control over their learning and development, including 12 of 19 organisations.

*This is necessary to allow individuals to take responsibility to identify the right learning priorities, better supports reflective learning, and should make CET more agile and relevant to today's varied clinical practice. A key benefit of self-directed learning is that it will allow individuals to prioritise CET that meets the needs of their own mode of practice. **Association of Optometrists***

*Linking CET to high level learning outcomes and standards allows for flexibility to undertake self-directed learning activities focused on developing skills that are most relevant to individual needs. **General Medical Council***

However, stakeholder feedback from additional comments highlighted that there is a view that knowledge and skill in core areas of practice must be maintained to avoid de-skilling and ensure patient safety, whilst enabling increased specialisation in areas of relevance or interest.

*I feel all competencies still need to be covered if we are to be responsible for these areas in practise. **Optometrist***

Comments also suggested that this approach may risk registrants becoming too specialised, avoiding topics that were not of interest, and being reluctant to work outside their comfort zone. Again, it was felt this could result in de-skilling or a shortage of acquiring new skills and knowledge.

*Allowing practitioners to fully design their own learning and development might mean that they deskill in some areas. **Optometry Northern Ireland***

*The risk of not completing certain competencies because they aren't relevant to your current practice could then exacerbate the deskillling, and ultimately restrict future development. **Dispensing optician***

The main challenge of moving towards this approach was the potential for gaps in knowledge, loss of core competencies and de-skilling, should registrants be allowed to specialise in the areas they most commonly work in or which they were most interested in. However, a wide range of benefits were also suggested, including flexibility and personalisation of the learning experience and undertaking CET more relevant to registrants' everyday practice.

Aligning CET requirements for optometrists and dispensing opticians

The GOC asked stakeholders for their views on aligning CET requirements for all their registrants, specifically about their views on peer review. Optometrist and dispensing optician respondents listed a number of benefits when thinking about their experiences of peer review, including exchanging ideas with colleagues, meeting peers (particularly for lone workers), learning and sharing best practice, and generally having positive experiences. Smaller proportions of respondents commented on negative experiences of peer review, which they found to be of little benefit or having no impact on their personal practice.

Three in five (59%) respondents agreed that peer review should play a more central role in a scheme which aims to embed a concept of lifelong learning and reflection. One in five (21%) disagreed with this, and a further 19% neither agreed or disagreed. All 19 organisational responses agreed with this statement. Additional comments made by respondents further highlight this divided opinion, with some commenting that peer review was useful in the current CET scheme, others (primarily organisations) commenting that peer review should play a more central role, and those who thought it should not be mandatory or central to CET.

Peer review is particularly useful...it encourages peers to exchange ideas which are very constructive. **Optometrist**

Helps me, as the only DO in a very busy practice, connect with other professionals. **Dispensing optician**

Over half (55%) agreed with the principle that the GOC should introduce peer review for dispensing opticians. Almost one in five (17%) disagreed with this, including a larger proportion of dispensing opticians (30%). Almost all organisational responses (15 out of 16) agreed with this proposal. A large proportion of additional comments focused on the issue of funding for dispensing opticians to undertake CET, but many also suggested that peer review would be beneficial for dispensing opticians.

Both dispensing opticians and optometrists would gain from undertaking peer review together on topics that are common to both professions. **College of Optometrists**

The most commonly suggested barriers for dispensing opticians to introducing this policy were financial, such as the cost of attending, travel expenses and lack of funding. The perceived inequality of funding between optometrists and dispensing opticians was particularly highlighted. Accessibility and time were also highlighted as significant barriers. However, a significant minority highlighted the positive impacts over the barriers, such as engaging with colleagues, swapping ideas and improving learning.

As we don't receive CET grants or funding, and are being paid considerably less than most optometrists, financially would be the main impact for me. **Dispensing optician**

Views on the proposed timeframe for introducing changes

The GOC is reaching the end of the current three-year CET cycle which will finish on 31 December 2018. It is then proposing a 12-month transition year from 1 January to 31 December 2019, followed by a new scheme to be launched on 1 January 2020.

Impact of the proposed one-year transition period

The largest proportion of respondents (49%) indicated that there would be little or no impact as a result of the proposals for a one-year transition period, that it would be easy to achieve the requirements, or that the proposals were a good or reasonable idea.

It is not an unreasonable target to meet in a year. **Optometrist**

Since you say that we are not expected to cover all the competencies it shouldn't be a problem.
Dispensing optician

However, smaller proportions focused on negative impacts or concerns, including potential difficulties achieving the required number of points (15%), particularly interactive points, and especially for certain registrants such as those on maternity leave, working part time, or living in rural areas (18%). Small proportions also suggested that the transition period should be longer or more flexible (8%), or that there should be more accessible opportunities to gain CET points and peer review (10%).

The GOC should urgently review whether the CET reforms can be fully delivered by January 2020. If not we think it would be preferable to begin another three-year cycle in 2019 rather than risk needing two transitional years before the next cycle.

Association of Optometrists

Because the minimum is currently six points in a year, some registrants may find 12 difficult, so will need maximum notice.

College of Optometrists

We consider that this time frame is realistic and achievable. However, some allowance needs to be provided for practitioners with special circumstances (e.g. those on maternity leave, long term sick leave etc.)

Optometry Northern Ireland

Support from the GOC

When asked how the GOC could best support stakeholders during the transition year and into a new scheme starting in January 2020, respondents' comments focused on good communication, including promotion, reminders and updates. Others suggested that the GOC should provide lots of information such as clear policies, guidelines, templates and examples.

Communication is critical to ensure registrants are well supported. **Education/training provider – Postgraduate CET**

The GOC should be clear and timely in its communications to registrants about the transition period, the expectations on them and the further changes planned for 2020. **Association of Optometrists**

Again, respondents suggested that it should be easier to access CET points, including more opportunities for free, local or online events. Flexibility was also mentioned, focusing on registrants who may struggle to achieve the required number of CET points during the transitional phase.

*Make sure there's a lot of online CET available free. **Optometrist***

*Work closely with ABDO to help us access interactive learning. **Dispensing optician***

A number of responses, particularly from organisations, said that as much notice should be provided as possible to ensure that registrants are able to successfully adapt to the transitional period and into a new CET scheme.

*Give us as much notice as possible of the new scheme requirements so we can implement in time for January 2020. **Directorate of Optometric Continuing Education & Training***

Summary of the key findings

The consultation has provided a wealth of insight which will help to inform the GOC's review of its CET scheme. The key findings of this consultation are as follows:

- There are generally positive attitudes towards the current CET scheme, with some suggestions made to make it more accessible such as more learning opportunities at a local level, online or free of charge. However, organisations appear less positive towards some aspects of the current scheme
- Stakeholders focus on clinical risks as the riskiest areas of practice
- Stakeholders believe there is a risk of de-skilling, but that this can be mitigated by maintaining core areas of knowledge and skill
- Stakeholders feel more could be done to promote and enable a culture of lifelong learning and reflection
- Some stakeholders, particularly organisations, feel that the name 'Continuing Professional Development' would be more appropriate than 'Continuing Education and Training'
- There is significant appetite from stakeholders for registrants to have more control over their learning and development, which is supported by organisations, but the correct balance between autonomous and mandatory learning needs to be established to prevent de-skilling
- Attitudes towards increased focus on peer review are more mixed. Dispensing opticians were more likely to disagree that peer review should be introduced for dispensing

opticians, whereas almost all organisations agreed that peer review should play a more central role within CET and should be introduced for dispensing opticians

- A one-year transition period is generally seen as achievable, but important impacts of this have been highlighted by stakeholders for certain registrants who may be working part time, on maternity leave or living in rural areas
- Communication is seen as key to the success of the transition year and new CET scheme implementation. A number of organisations highlighted the importance of providing as much notice as possible for the transitional period to be successful

1. About this research

1.1 Introduction

The GOC is the UK regulator for optometrists, dispensing opticians, student opticians and optical businesses, with the stated mission of protecting and promoting the health and safety of the public.

Part of the GOC's regulatory remit is to oversee a mandatory scheme of continuing education and training (CET). This is to ensure that optometrists and dispensing opticians:

- Maintain and develop their knowledge, skills and behaviours throughout their professional careers (sometimes referred to as continuing professional development (CPD))
- Continue to be fit to practise (sometimes referred to as revalidation)

The GOC's current CET scheme was introduced in 2013, but the optical sector has changed since then and the work optometrists and dispensing opticians carry out has expanded and diversified. The GOC wants to ensure that their CET scheme keeps pace with these changes and continues to help improve the safety and quality of care patients receive. For more information about the CET scheme please use the following link: <https://www.optical.org/en/Education/CET/index.cfm>

As part of a review of its CET scheme, the GOC conducted a public consultation called 'Fit for the Future: Lifelong Learning Review', which explored stakeholder views on the existing CET scheme and how it can evolve to meet the challenges of the future.

An online survey was created by the GOC to collect responses to the consultation. Enventure Research, an independent research agency, was commissioned to conduct independent analysis of the consultation data on behalf of the GOC.

1.2 Methodology

Stakeholders could access the consultation online via the Citizen Space consultation platform, which included a survey with a number of open and closed questions covering stakeholder views and understanding of the current CET scheme, the proposed changes to the scheme and proposed timeframe. A copy of the questionnaire can be found in **Appendix A**.

The key audiences for this consultation included:

- Individual respondents – registrant optometrists and dispensing opticians (providing their personal feedback)
- Organisational respondents – optical employers, businesses, CET providers and professional associations (providing feedback on behalf of their organisation)

1.3 Consultation response

The consultation ran for eight weeks from 17 July until 11 September 2018. During this time, 994 responses were received.

Individual responses

The sample was comprised almost exclusively of individual responses (98%, 973 responses). As shown in the table below, seven in ten (71%) individual responses came from optometrists and three in ten (29%) came from dispensing opticians. Very small proportions of individual respondents indicated that they were optometry students (1%) or members of the public (just one respondent). The majority of ‘other’ responses were dispensing opticians clarifying that they were contact lens opticians.

Figure 1 – Individual response category

Base: Individual respondents (973)

Category	Number	Percentage
Optometrist	684	71%
Dispensing optician	277	29%
Student – optometry	6	1%
Member of the public	1	0%
Other	17	2%
No reply	4	0%

Organisational responses

Twenty-one consultation responses came from organisations (2%). The table below presents the number of responses from different organisation categories.

Figure 2 – Organisational response category

Base: Organisational respondents (21)

Category	Number	Percentage
Optical professional body	7	33%
Other optical employer	6	29%
Education/training provider – postgraduate/CET	4	19%
Optical business registrant	3	14%
Healthcare regulator	1	5%

Responses were received from the following organisations, who agreed to have their responses published as part of the consultation:

- Association for Independent Optometrists and Dispensing Opticians (AIO)
- Association of Contact Lens Manufacturers Ltd (ACLM)
- Association of Optometrists (AOP)
- College of Optometrists
- Directorate of Optometric Continuing Education and Training (DOCET)
- Federation of Ophthalmic and Dispensing Opticians (FODO)
- General Medical Council (GMC)

- Optical Consumer Complaints Service (OCCS)
- Optometry Northern Ireland
- Royal College of Ophthalmologists
- Safeguarding children and adults at risk (description provided only)
- SeeAbility

The remaining organisations wished to have their responses remain anonymous.

1.4 Interpretation of the consultation findings

Interpreting percentages

This report contains tables and charts to present the consultation data. In some instances, the responses may not add up to 100% or the base size may differ. There are several reasons why this might happen:

- The question may have allowed each respondent to give more than one answer
- As all questions were voluntary, a respondent may have not provided an answer to the question
- Individual percentages are rounded to the nearest whole number so the total may come to 99% or 101%
- A response of less than 0.5% is not displayed in charts

Combined response options

A number of consultation questions allowed respondents to answer questions using Likert scales, including scales from *strongly agree* to *strongly disagree*. As differences between responses within these scales are often subjective (for example, the difference between those who answered *strongly agree* and *agree*), these response options have been combined to create a total response. These are presented in charts and tables as *total* results.

Subgroup analysis

Where possible, analysis has been undertaken to explore the results provided between optometrists and dispensing opticians. Any statistically significant differences have been highlighted throughout the report. Direct comparison to organisational responses has not been included due to the small number of organisations who took part in the consultation (21), but the views of organisations have been highlighted throughout the report.

Thematic analysis of open-ended questions

Many of the questions in the consultation survey were open-ended, where respondents could provide a free-text response, either in standalone survey questions or as follow-up open-ended questions where respondents could provide additional comments.

To analyse this feedback, qualitative thematic coding has been conducted to allow for analysis, where code frames have been developed for each question to highlight the main patterns and

themes emerging from the verbatim responses. This has allowed the feedback to be presented in tables and charts throughout this report, using counts and percentages. Please note that the percentages provided are for illustrative purposes and are not designed to be statistically accurate.

Where relevant, verbatim quotations from open-ended survey questions have been included as examples. A colour-coding system is used, where **blue** responses are from optometrists, **green** responses are from dispensing opticians, and **red** responses are from organisations.

Throughout this report, those who took part in the online consultation are referred to as 'respondents'.

2. Views and understanding of the current CET scheme

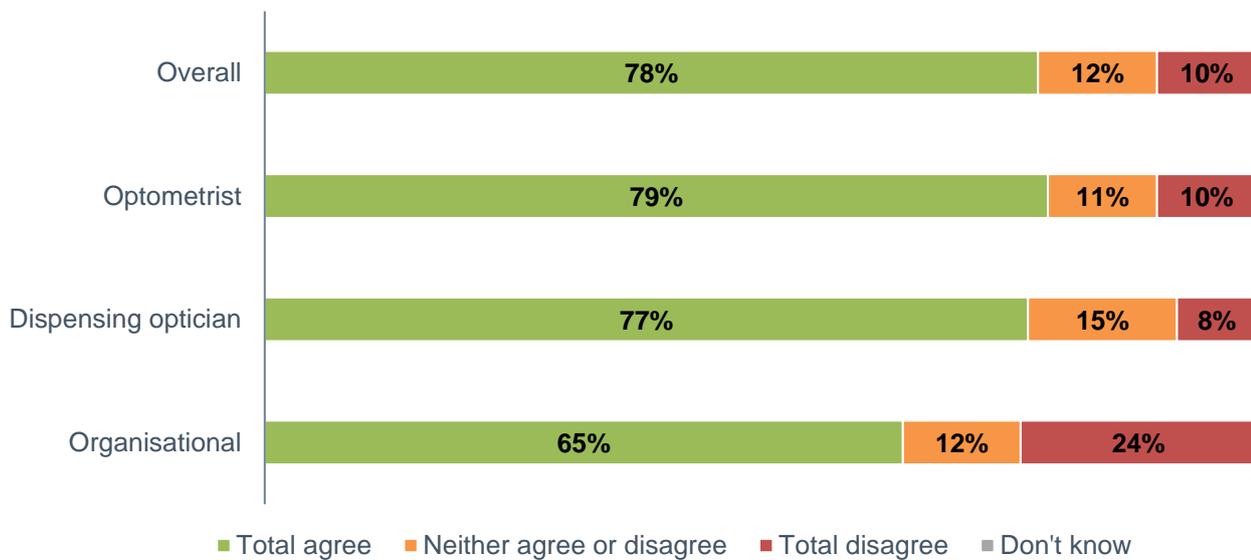
2.1 Attitudes towards the current CET scheme

All consultation respondents were asked to indicate whether they agreed or disagreed with a series of statements about the GOC’s current CET scheme.

Almost four in five respondents (78%) agreed that the GOC’s current CET scheme **allows registrants to develop their skills and knowledge in order to keep pace with changes that are happening in the optical sector**. Just 10% disagreed with this statement. This result is consistent between optometrists and dispensing opticians.

Figure 3 – To what extent do you agree or disagree that the GOC’s current CET scheme allows registrants to develop their skills and knowledge in order to keep pace with changes that are happening in the optical sector?

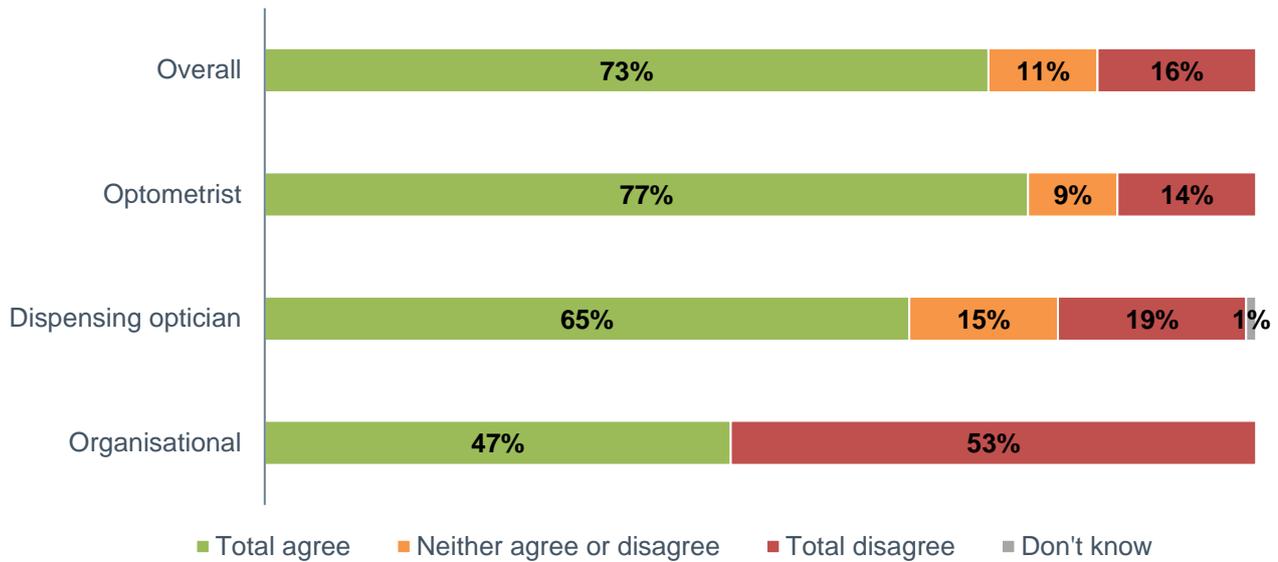
Base: Overall (979); Optometrist (677); Dispensing optician (274); Organisational (17)



Almost three-quarters (73%) agreed that the current CET scheme **allows registrants the flexibility to undertake CET in relation to their individual scope of practice**. A larger proportion of optometrists (77%) agreed with this statement when compared to dispensing opticians (65%). Opinion from organisations is more divided, with nine out of 17 organisations disagreeing with this statement.

Figure 4 – To what extent do you agree or disagree that the GOC’s current CET scheme allows registrants the flexibility to undertake CET in relation to their individual scope of practice?

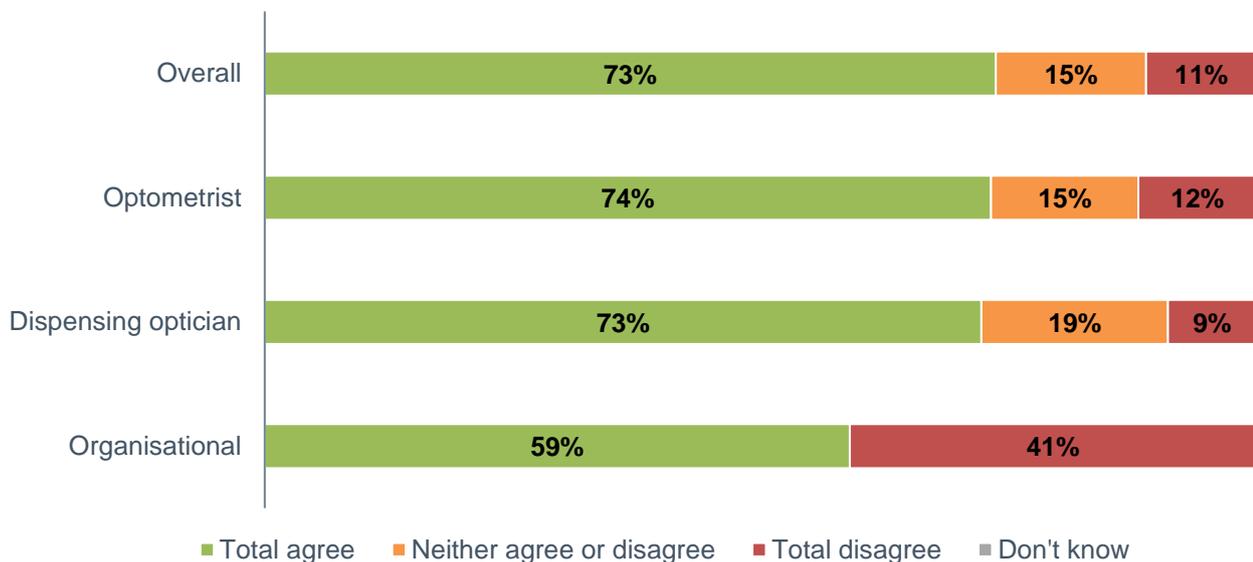
Base: Overall (980); Optometrist (675); Dispensing optician (277); Organisational (17)



Almost three-quarters (73%) agreed that the current CET scheme **helps encourage professional development**. This result is consistent for both optometrist and dispensing optician respondents, but seven out of 17 organisations disagreed with this statement.

Figure 5 – To what extent do you agree or disagree that the GOC’s current CET scheme helps encourage professional development?

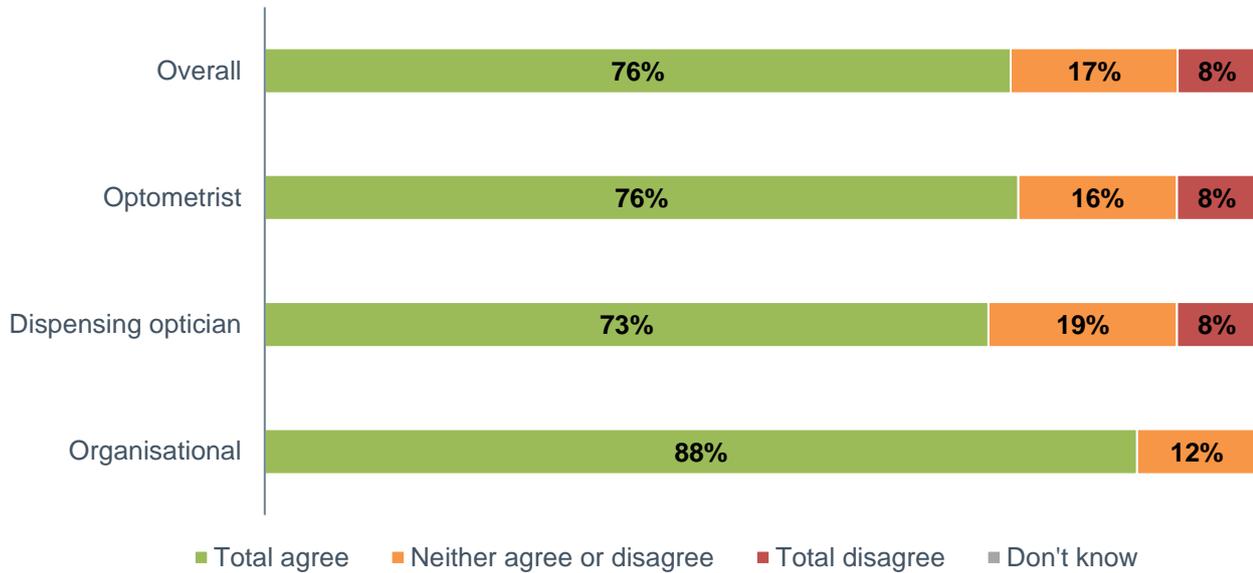
Base: Overall (975); Optometrist (672); Dispensing optician (275); Organisational (17)



Three-quarters of respondents (76%) agreed that the current CET scheme **helps improve registrants’ practice**. A larger proportion of optometrists answered that they *strongly agreed* with this statement (25%) when compared to dispensing opticians (17%).

Figure 6 – To what extent do you agree or disagree that the GOC’s current CET scheme helps improve registrants’ practice?

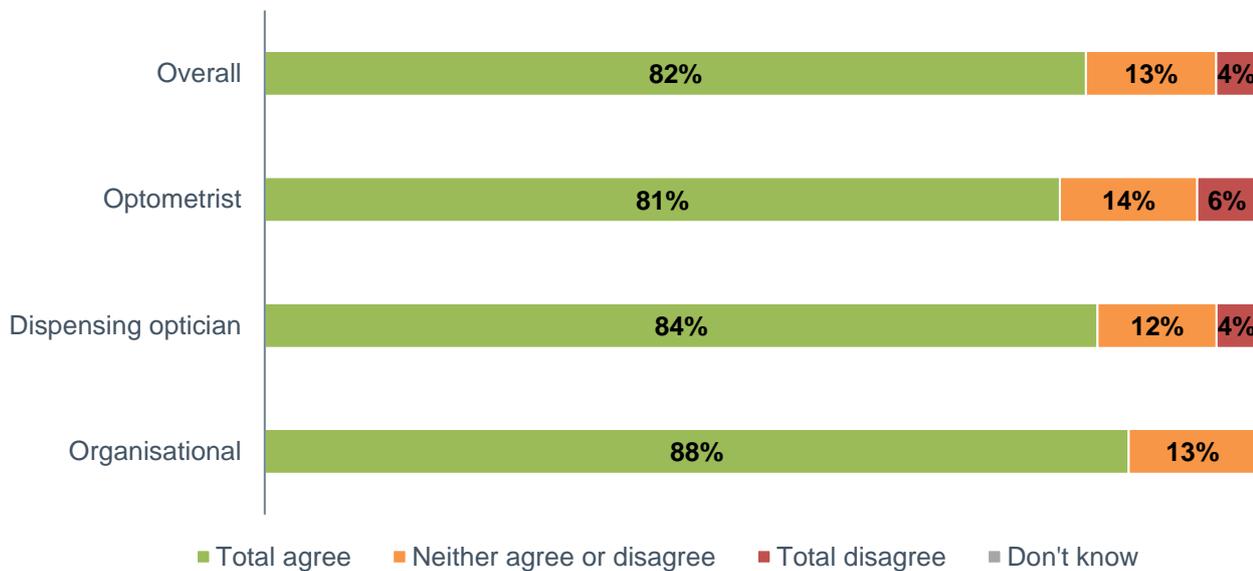
Base: Overall (982); Optometrist (678); Dispensing optician (276); Organisational (17)



Just over four in five (82%) agreed that the current CET scheme **helps registrants keep up to date with good practice**. A larger proportion of optometrists answered that they *strongly agreed* with this statement (27%) when compared to dispensing opticians (22%).

Figure 7 – To what extent do you agree or disagree that the GOC’s current CET scheme helps registrants keep up to date with good practice?

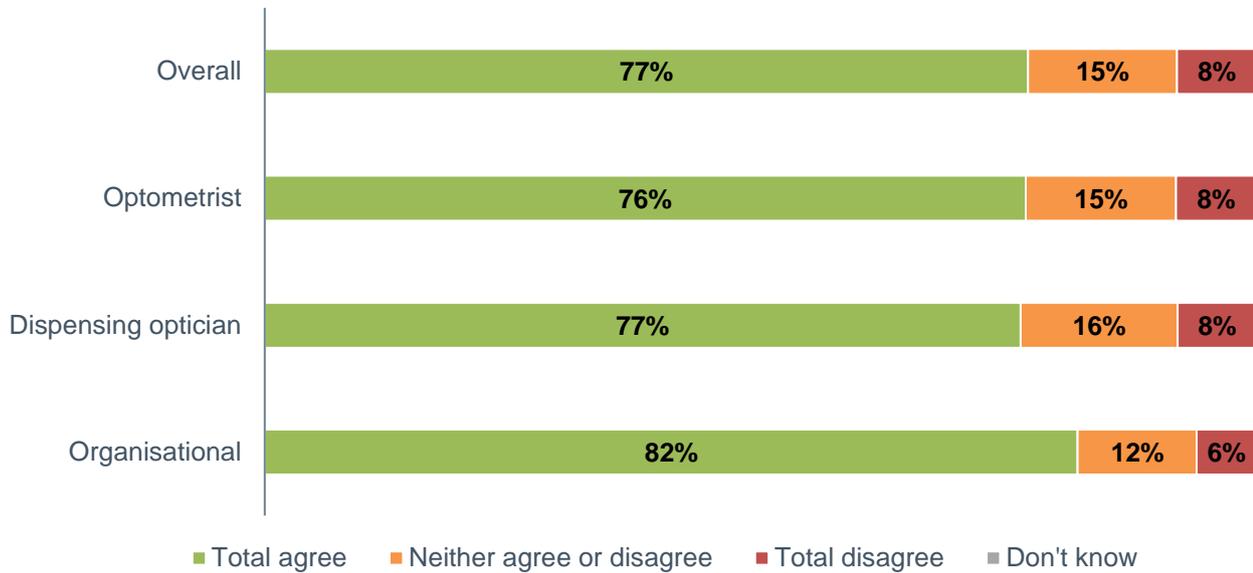
Base: Overall (976); Optometrist (675); Dispensing optician (274); Organisational (16)



Just over three-quarters (77%) agreed that the current CET scheme **helps registrants plug gaps in their knowledge**. A larger proportion of optometrists *strongly agreed* with this statement (26%) when compared to dispensing opticians (19%).

Figure 8 – To what extent do you agree or disagree that the GOC’s current CET scheme helps registrants plug gaps in their knowledge?

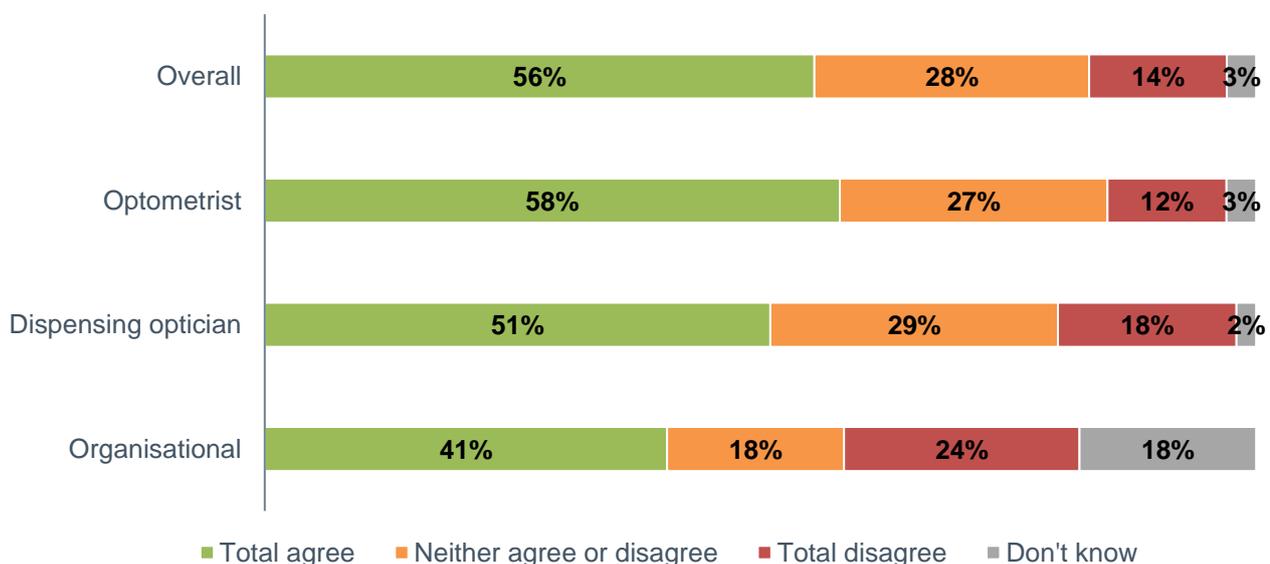
Base: Overall (982); Optometrist (678); Dispensing optician (276); Organisational (17)



In contrast to other statements, a smaller majority (56%) agreed that the current CET scheme **helps to build and maintain public trust and confidence in the optical professions**. A larger proportion of dispensing opticians disagreed with this statement (18%) when compared to optometrists (12%). Only seven of 17 organisations agreed with this statement.

Figure 9 – To what extent do you agree or disagree that the GOC’s current CET scheme helps to build and maintain public trust and confidence in the optical professions?

Base: Overall (980); Optometrist (676); Dispensing optician (276); Organisational (17)



2.2 Understanding risks in the optical sector and the role of revalidation

The GOC uses the process of revalidation to demonstrate that GOC registrants remain fit to practise throughout their professional careers. The current CET scheme requires fully qualified optometrists and dispensing opticians to demonstrate that they are keeping their skills and knowledge up to date and remain fit to practise. The scheme was informed by research carried out into risks associated with opticians in 2010, to help ensure registrants undertook CET and maintained their skills and knowledge in areas of practice that were considered riskier.

As the profession has changed since 2010 and the work optometrists and dispensing opticians are carrying out is more varied, more challenging and potentially more high-risk, the consultation asked a series of questions about areas of risk.

Risk within the optical profession is categorised in the following ways:

- **Clinical risks** - risks to patients arising from the nature of diseases or conditions, and the associated consequences
- **Competency risks** - risks resulting from practitioners lacking the necessary skills or knowledge to diagnose and manage diseases and conditions, or to use appropriate equipment
- **Conduct risks** - risks stemming from the behaviour of practitioners, either through negligence or inappropriate behaviour
- **Contextual risks** - features of the environment in which a practitioner operates that may increase the scope for risk, or influence the severity or likelihood of clinical and competency risks; for example, isolated practice
- **Systems risks** - risks arising from inadequate systems, such as the absence of checks and inspections or poorly managed businesses

All consultation respondents were asked what they thought the riskiest areas of work carried out by optometrists and dispensing opticians were. Respondents were able to provide free-text responses, which have been thematically coded for analysis by grouping similar responses together, and are presented in the chart overleaf at an individual risk level.

Figure 10 – What do you think are the riskiest areas of work carried out by optometrists and dispensing opticians? How well does the CET scheme address these risks?

Base: All respondents who provided a response (787)



The most common risk, suggested in a quarter of responses (25%) related to the **detection of disease or missed pathology**, followed by a further 17% which related to **emergencies and the identification and management of eye disease**. Some areas of risk were more likely to be suggested by optometrists when compared to dispensing opticians and vice versa, listed in the table below.

Figure 11 – Areas of risk suggested by larger proportions of optometrists or dispensing opticians

Optometrists	Dispensing opticians
Detection of disease/missed pathology	Working with vulnerable groups/safeguarding
Emergencies/identifying and managing eye disease	Risk of complaints/litigation
Optometrists offering wider services	Contact lenses
Understanding of/ability to use latest technology/products/techniques	Communication
Time constraints of eye examinations/lack of time for additional tasks	Reliance on non-optical staff
Independent prescribing	
Optical procedures	

Some comments also related to how well the current CET scheme addresses these risks. One in six (16%) commented to say that CET goes some way to address these risks or provides relevant information, and a similar proportion (18%) of comments suggested that CET does not address these risks or do enough to support registrants, highlighting that opinion is divided.

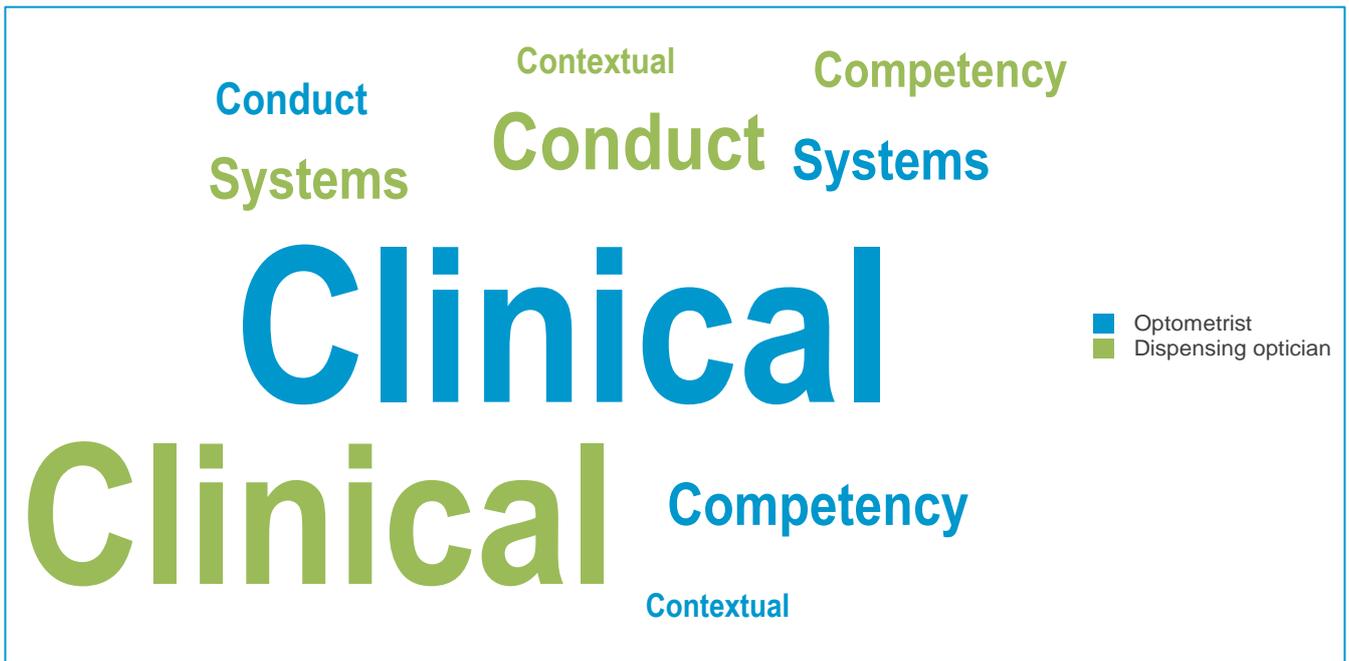
*It is appreciated that the current scheme requires commitment to all areas of practice but it is still entirely possible for all education to be theoretical and no practical skills revision. **Education/training provider – postgraduate/CET***

*I think it encourages individual to keep up. More knowledge provides less risk. **Dispensing optician***

*Safeguarding. I feel CET does not address these risks and consequences. **Dispensing optician***

Each risk has also been assigned one of the GOC’s five risk categories to understand what types of risks stakeholders are most concerned about. This categorisation is presented in the word cloud overleaf, where larger words represent those suggested by larger proportions of respondents. Risks in **blue** text are those suggested by optometrists and risks in **green** text are those suggested by dispensing opticians. Clinical risks were by far the most commonly suggested by all respondents. A larger proportion of optometrists suggested clinical risks when compared to dispensing opticians, whereas a larger proportion of dispensing optician respondents suggested conduct risks when compared to optometrists.

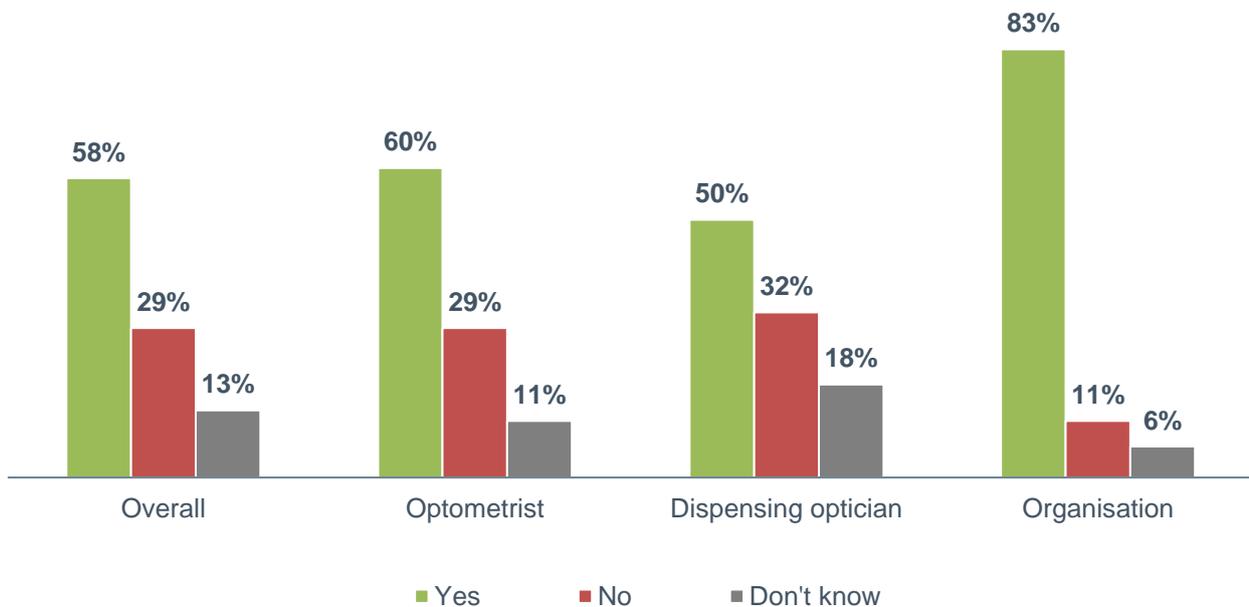
Figure 12 – Riskiest areas – categorised – by optometrist/dispensing optician – word cloud



Overall, almost three in five respondents (58%) thought that there is a risk that optometrists and dispensing opticians may be de-skilling. A larger proportion of optometrists (60%) thought this when compared to dispensing opticians (50%). From organisations, 15 out of 18 thought there was a risk of de-skilling.

Figure 13 – Do you think that there is a risk that optometrists and dispensing opticians may be de-skilling i.e. losing their skills and knowledge in some areas of practice?

Base: Overall (976); Optometrist (675); Dispensing optician (272); Organisational (18)



Respondents were able to provide additional free-text comments following this question, which have been thematically coded for analysis by grouping similar responses together, and are presented in the table overleaf. The majority of responses suggested specific areas that optometrists and dispensing opticians may be de-skilling, or reasons why this may be happening.

The largest proportion of comments (27%) related to **technology and automation**. Many respondents highlighted the increasing use of technology for conducting optical procedures such as retinoscopy and refraction, which they explained was resulting in over-reliance on technology and loss of skills to manually deliver these procedures.

*Reliance on new technologies inevitably impact upon some primary skills. **Optical business registrant***

*Increasing automation can lead to lack of practice in basic skills e.g. Retinoscopy. **Optometrist***

*There is a growing reliance on digital technology...sometimes makes the core skills redundant. **Dispensing optician***

A further 15% of comments related to **contact lenses and fitting**. This included individuals who identified this as an area in which they felt they were de-skilling because they were not regularly undertaking this type of work, specifically in rigid gas-permeable lenses and often due to the presence of a contact lens optician in their practice.

*If registrants do not see many contact lens patients...undertaking one or two hours of CET...will not replace lack of experience and could give a false sense of security. **Directorate of Optometric Continuing Education and Training***

*I am an optometrist and I rarely fit contact lenses nowadays (due to increased number of contact lens practitioners). I find that I am less able to solve contact lens related problems compared to when I was newly qualified. **Optometrist***

A number of responses commented on **problems with the current CET scheme** which they thought either resulted in de-skilling within the profession or did little to prevent it.

*Simply achieving the points does not mean that the practitioner is (up)skilled in that area and safe to practice. **Education/training provider – postgraduate/CET***

*I think that certain areas of CET should be compulsory, to ensure all practitioners are up to date with changes in law/guidelines/new treatment methods or products available. **Dispensing optician***

*You can achieve points for orthokeratology but this does not mean someone is competent to fit such lenses. **Education/training provider – postgraduate/CET***

Whilst the majority of comments related to areas of, or reasons for de-skilling, significant minorities of comments disagreed that there was a risk of de-skilling. These comments included those who said:

- The opposite was true and that **registrants were becoming more skilled** (6%)
- **CET was there to prevent de-skilling** (4%)
- It was **the responsibility of the registrant to keep their knowledge and skills up to date** (4%)
- **Certain skills became out of date and therefore should be replaced** (3%)

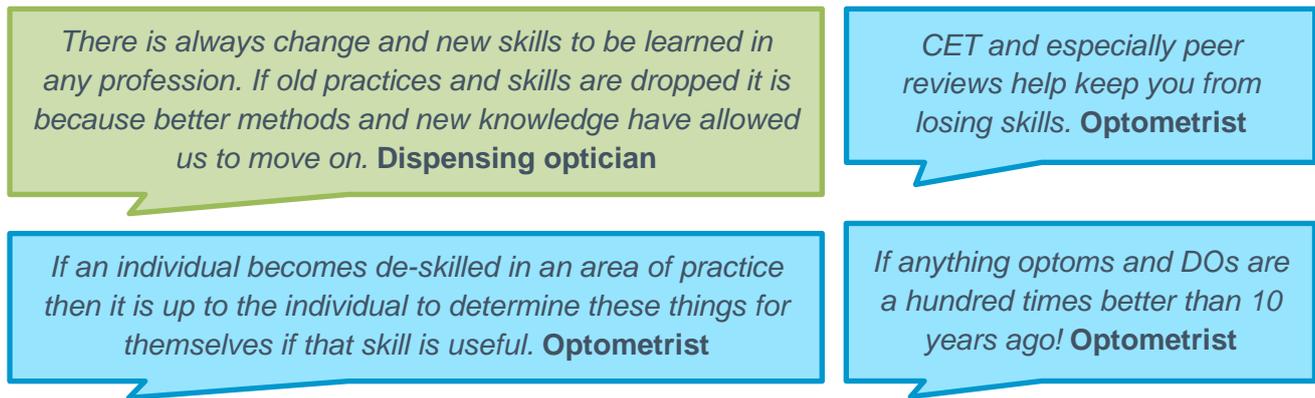


Figure 14 – Do you think that there is a risk that optometrists and dispensing opticians may be de-skilling i.e. losing their skills and knowledge in some areas of practice? – Additional comments

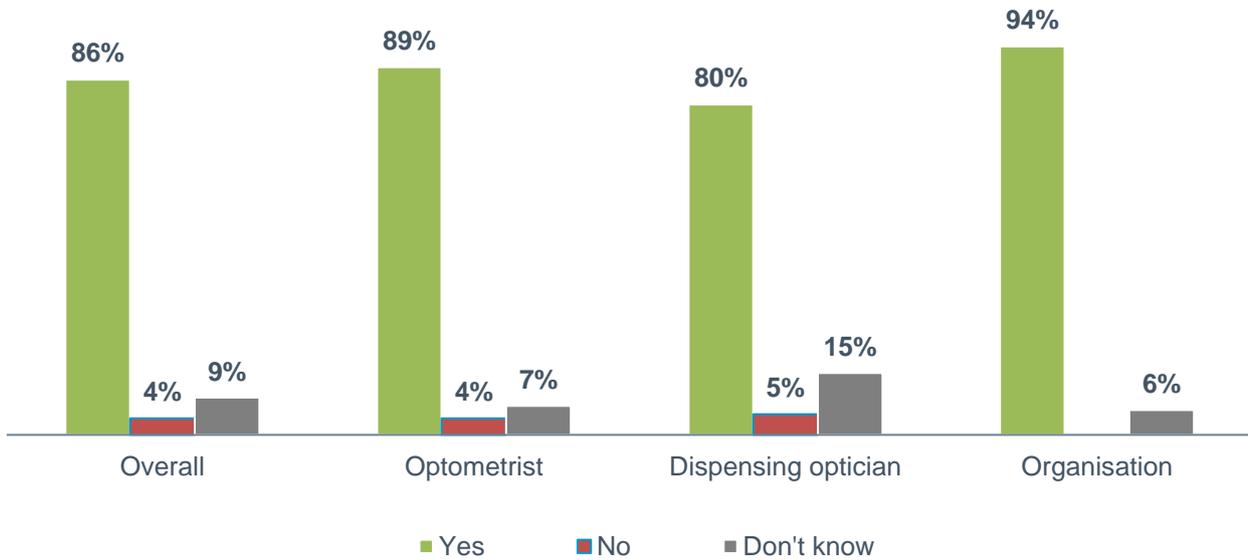
Base: Those who provided a response (494)

Additional comment	Number	Percentage
Technology and automation	132	27%
Contact lenses/specialised contact lens fitting	76	15%
In areas not frequently used in daily practice/of interest	45	9%
Dispensing skills	45	9%
Problems with CET system	36	7%
Commercial pressures	34	7%
Yes - inevitable	28	6%
No - have become more experienced and knowledgeable over the years	28	6%
Particular problem for those working in multiples	27	5%
Specialisation in particular areas	23	5%
Paediatric testing/dispensing	21	4%
Low vision	20	4%
CET prevents this/negates the risk	19	4%
Depends on how proactive you are/commitment to the role	19	4%
Responsibility to keep knowledge and skills up to date	19	4%
Delegation to unqualified staff	18	4%
Lack of confidence/risk averse culture/over-referring	18	4%
Patient base/variety of conditions seem dependent on local practice area demographics	18	4%
Binocular vision	18	4%
No - some skills are becoming out of date and need to be replaced	17	3%
Lack of skills at qualification	15	3%
Issue is not deskilling but failure to gain new skills to keep up	9	2%
Don't know	8	2%
Other	47	10%

The majority of respondents overall (86%) said that there were core areas of practice that optometrists and dispensing opticians should keep their skills and knowledge up to date in. A larger proportion of optometrists (89%) thought this when compared to dispensing opticians (80%). From organisations, 17 out of 18 also said this.

Figure 15 – Are there any core areas of practice that optometrists and dispensing opticians should keep their skills and knowledge up to date in?

Base: Overall (955); Optometrist (660); Dispensing optician (266); Organisational (18)



Respondents were able to provide additional comments to this question. The majority listed various areas of practice that they felt optometrists and dispensing opticians should keep their skills and knowledge up to date in. These areas have been thematically coded for analysis, grouping similar responses together, and are presented in the word cloud overleaf.

The larger words represent those suggested by larger proportions of respondents. As shown, **pathology/ocular disease** was the most commonly suggested area, followed by **developments in technology/products**. A large proportion suggested that **all areas were of importance**, and did not single out specific core areas.

Figure 16 – Suggested core areas of practice to keep skills and knowledge up to date in



2.3 Lifelong learning and reflection

The GOC wants to promote and emphasise the concepts of lifelong learning and professional development within its CET scheme and believes that registrants should take time to reflect on their practice and identify areas in which they could improve or develop. This reflection should then be used to plan their CET.

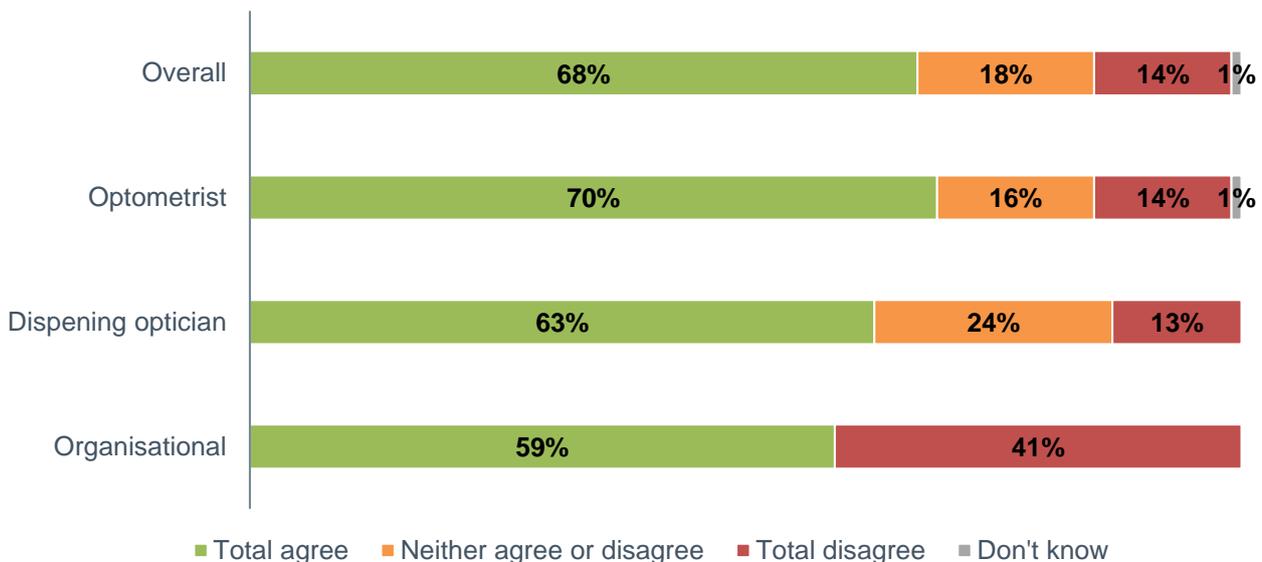
The current CET scheme offers some support for registrants to reflect on their practice, but the GOC wishes to further develop and instil a concept of lifelong learning and reflection so that registrants become responsible for their own learning, reflection and CET planning.

Previous stakeholder engagement has suggested that there is a perception that the current CET scheme is aimed at maintaining a ‘safe beginner’ level rather than driving forward a culture of learning and improvement throughout a registrant’s professional career. Consultation respondents were therefore asked a series of questions relating to their perceptions of lifelong learning and reflection.

Two thirds of respondents (68%) agreed that the GOC’s current CET scheme intends to promote and embed a culture of lifelong learning and encourages registrants to reflect on their practice. Just one in seven (14%) disagreed with this statement. Subgroup analysis highlights that a larger proportion of optometrists (70%) agreed with this statement when compared with dispensing opticians (63%). Seven of 17 organisations disagreed with this statement.

Figure 17 – To what extent do you agree or disagree that the GOC’s current CET scheme intends to promote and embed a culture of lifelong learning and encourages registrants to reflect on their practice?

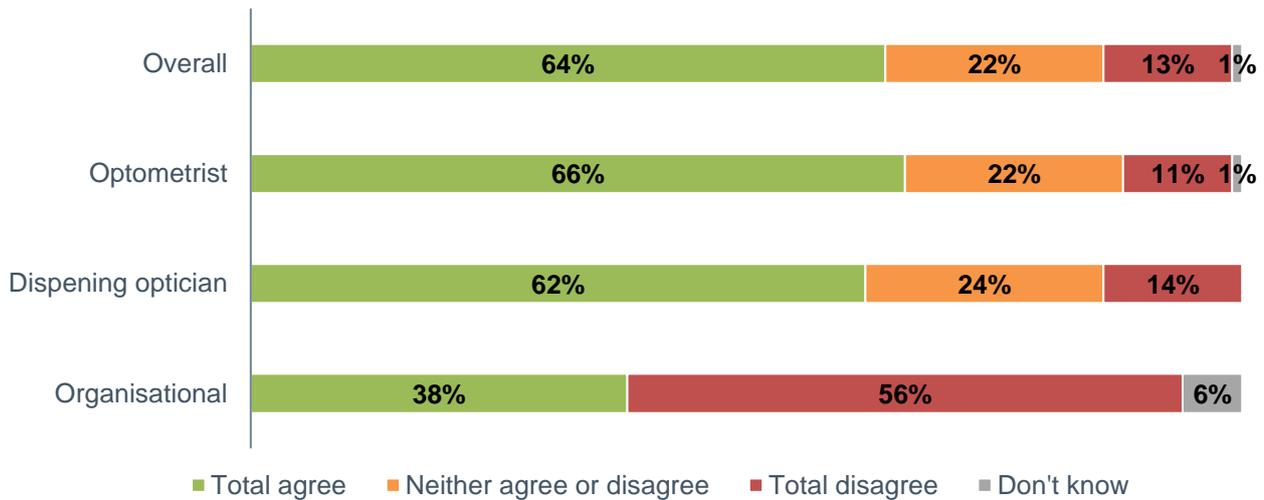
Base: Overall (974); Optometrist (675); Dispensing optician (271); Organisational (17)



Almost two thirds of respondents (64%) agreed that the name of current scheme, Continuing Education and Training (CET), helps to promote a culture of lifelong learning and reflection. One in seven (13%) disagreed with this statement. Subgroup analysis highlights that a larger proportion of optometrists (23%) *strongly agreed* with this statement when compared with dispensing opticians (17%). Just seven out of 16 organisations agreed with this statement.

Figure 18 – To what extent do you agree or disagree that the name of the current scheme, Continuing Education and Training (CET), helps to promote a culture of lifelong learning and reflection?

Base: Overall (981); Optometrist (678); Dispensing optician (276); Organisational (16)



Additional open-ended comments following these questions have been thematically coded for analysis. As shown in the table overleaf, the majority of comments (49%) related to **problems with the current CET scheme or suggestions for improvements**, with 11% additionally indicating that it was **difficult to motivate some individuals to learn**, or that **many registrants view CET as a box-ticking exercise**.

More scope for self-directed learning and improved processes for reflective and peer learning would better support the aim of lifelong learning and reflection. Association of Optometrists

The CET scheme has been more about ticking boxes, then actually improving practice. Dispensing optician

The current CET scheme does not talk about lifelong learning, and reflection is rather cursory. Directorate of Optometric Continuing Education and Training

The issue with the current method of continuing education is that many registrants perceive it is a 'tick box exercise' which must be completed every year. More needs to be done to encourage registrants to take an active interest in all or part of their profession and to expand their knowledge within this area whilst keeping up to date with the basic elements. Association for Independent Optometrists and Dispensing Opticians

We agree with promotion and culture of lifelong learning, However, working with many ECPs from different settings it is evident that some just collect points, without using the knowledge to update their practice. Education/training provider – Postgraduate CET

A further 17% made a comment about **other professions using the name continuing professional development (CPD)** and that it would be a more appropriate name for the CET scheme. However, 10% stated that **the name did not need to change** and 8% thought that it **does not matter what it is called**.

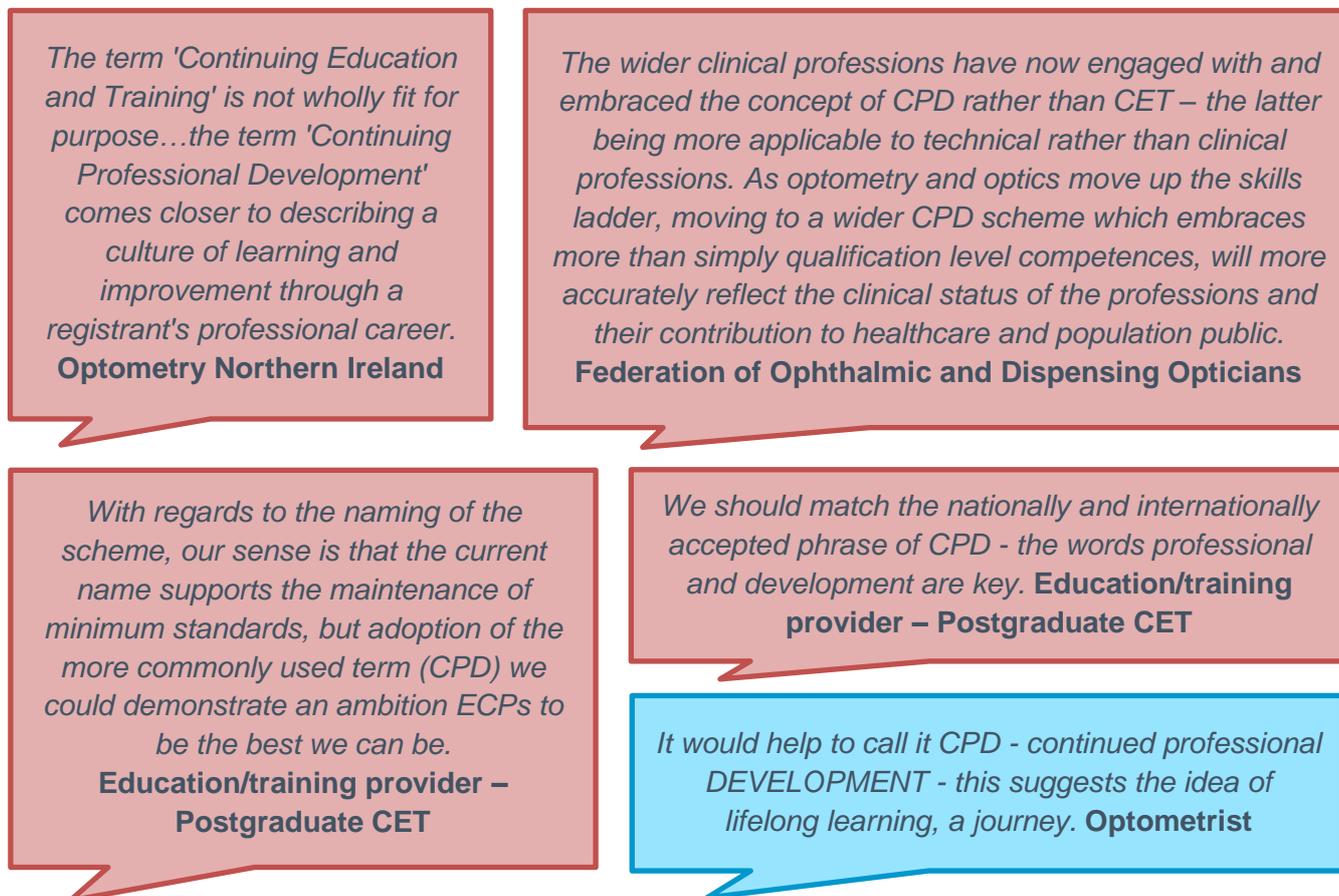


Figure 19 – Lifelong learning and education – Additional comments

Base: Those who provided a response (261)

Additional comment	Number	Percentage
Problems with current CET/suggestions for improvement	129	49%
Other professions call it CPD/more appropriate to call it CPD/ don't like the current name	44	17%
Difficult to motivate some individuals to learn/some see it as chore or box ticking exercise	29	11%
No need to change system/name/positive about CET	27	10%
Does not matter what it is called	22	8%
Needs to be more freedom in CET	3	1%
Should be a compulsory check on registrants	2	1%
Other	30	11%

2.4 Tools to help registrants reflect on their practice

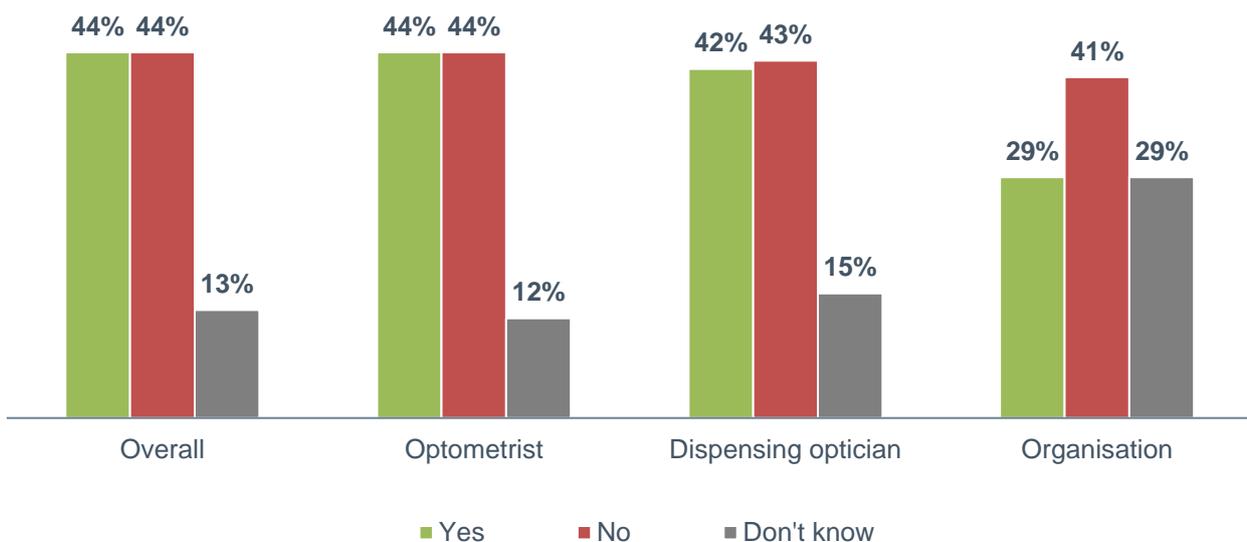
A number of tools are currently available to registrants to help them reflect on their practice, including:

- At the beginning of each CET cycle, registrants are asked to complete a scope of practice questionnaire to help them think about their own particular scope of practice and are asked to think about what learning and development they may want to do in next cycle
- Registrants are expected to complete a personal development plan for each three-year CET cycle, which they should use to reflect on their practice, plan their CET and review how well it went
- Registrants must complete a reflective statement when they attend a peer review event or a peer discussion to capture their learning. Peer review is a type of CET activity which allows registrants to discuss cases or scenarios with colleagues and learn from experiences they may have faced in clinical practice. A peer review event can be a registrant-led peer review group or a peer discussion delivered by a CET provider
- Registrants can voluntarily reflect on their practice at any point and add a reflective statement on the CET system
- Registrants can add non-CET activities to their personal development plan

Opinion was divided between those who said that these tools were helpful (44%) and those who said they were not (44%). This result was very similar between optometrists and dispensing opticians. Just five out of 17 organisations said that these tools were helpful.

Figure 20 – Are these tools helpful?

Base: Overall (980); Optometrist (679); Dispensing optician (273) Organisational (17)



Additional open-ended comments following this question have been thematically coded for analysis. As shown in the table overleaf, a large proportion of comments (20%) suggested that **reflection and reflection tools are not helpful**, or that **reflection is a waste of time**, and

15% said that the **tools show a lack of trust in registrants** who are capable of self-assessment.

Registrants have concerns about the purpose of the tools and if there are intended for GOC monitoring purposes rather than personal development. The tools are not easily available or emphasised on the platform.
Optical professional body

I would rather spend the time actually learning concrete facts & skills that are useful in practice, than spend that time reflecting, reviewing, etc.
Optometrist

The same proportion (15%) commented that reflection is more of a **box-ticking exercise** to gain CET points rather than an engaging process.

From my own experience, and speaking to other colleagues, it tends to be a tick box exercise that we do. Some aspects are good, but there needs to be a different method of reflecting instead.
Optometrist

The basics are in place but more could be made of them. Point counting and covering every competence continues to dominate the CET requirements. Directorate of Optometric Continuing Education & Training

Has that usefulness ever been surveyed? It feels very much like a tick box exercise. Education/training provider – Postgraduate CET

Smaller proportions of comments were **positive about peer review** (14%) or **reflection and reflection tools** (7%).

Peer review events are more helpful, as the discussion of actual events which have arisen in practice, and the understanding of the outcome and the processes around the decisions help you to understand the standards of practice. Dispensing optician

Peer reviews are definitely one of the best learning tools. Optometrist

Figure 21 – Tools to help registrants reflect on their practice – Additional comments

Base: Those who provided a response (312)

Additional comment	Number	Percentage
Reflection/reflection tools not helpful/a waste of time	62	20%
Professionals capable of self-assessment without documenting it/shows lack of trust	47	15%
Box ticking exercise/points gathering exercise/process not engaging	47	15%
Peer review useful/important	43	14%
Too time consuming/too much paperwork/too busy to complete	35	11%
Optional so few use them/have never used them	34	11%
Tools poorly understood/little guidance or training available	34	11%
Hard to make a plan and stick to it/hard to predict learning needs in advance	26	8%
Reflection/reflection tools useful	23	7%

Additional comment	Number	Percentage
Too difficult to access relevant CET/poor availability of topics makes process invalid	21	7%
Tools useful for those who are proactive	20	6%
Takes too long to accept points/not easy to reflect on CET done some time ago	17	5%
Learn more from discussions with colleagues/non-CET events	17	5%
Difficult to use/not user friendly	16	5%
Good idea in theory	15	5%
Can help focus training needs	12	4%
Too restrictive/lack of flexibility	10	3%
Continued learning/keeping up to date important	9	3%
Registrants worry that reflection could be used against them later	8	3%
Difficult to assess own educational needs	6	2%
Don't know	4	1%
Other	4	1%

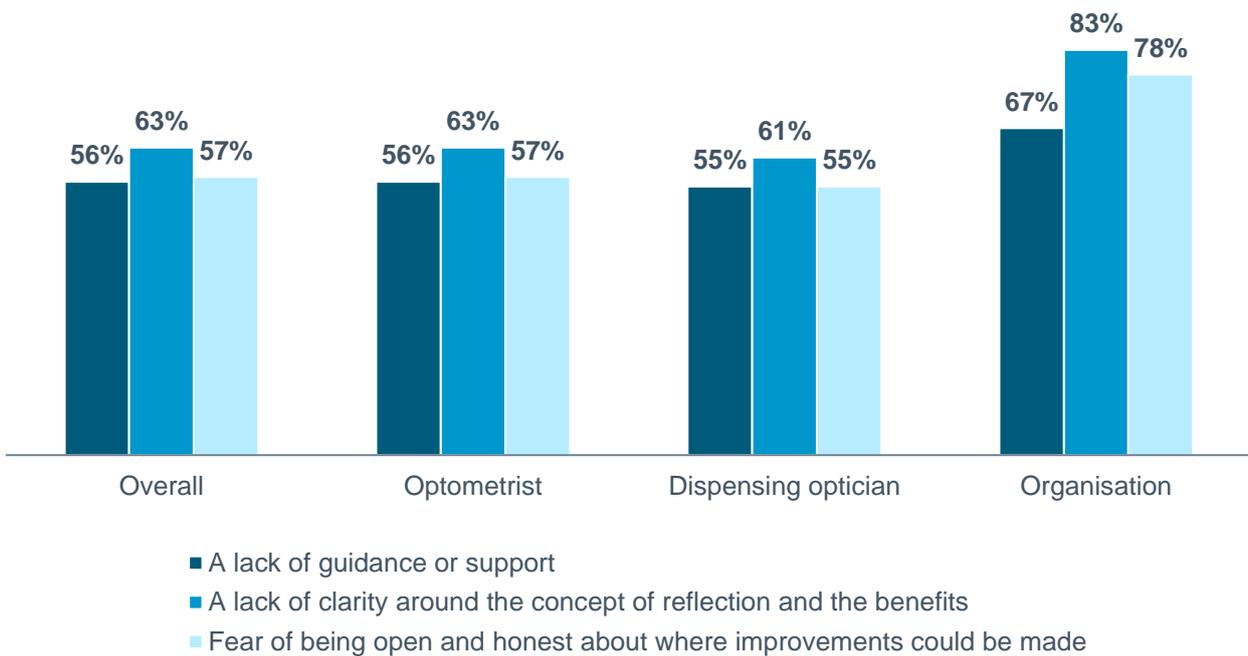
2.5 Barriers to reflective practice

Lack of clarity around the concept of reflection and the benefits was the barrier most commonly suggested that could make it difficult for optometrist and dispensing opticians to reflect on their practice (63%). Similar proportions of respondents thought that a lack of guidance or support (56%) and fear of being open and honest about where improvements could be made (57%) were also barriers to reflective practice.

No significant differences are seen between optometrists and dispensing opticians.

Figure 22 – Are there any barriers that could make it difficult for optometrists and dispensing opticians to reflect on their practice? (% who answered yes)

Base: Overall (969); Optometrist (672); Dispensing optician (268); Organisational (18)



Additional open-ended comments following this question have been thematically coded for analysis. As shown in the table overleaf, the most common (17%) related to **registrants’ fear of consequences when admitting mistakes or gaps in their knowledge**, such as fitness to practise action or litigation.

Linking maintenance of registration to training and development will create concerns for some registrants about how honest they can be about any skills gaps, so this needs to be addressed openly from the start to reassure registrants. Directorate of Optometric Continuing Education & Training

Optometrists fear asking questions about basics, as the assumption is that we should know them. Optometrist

Many people might be afraid of being open & honest if they felt their skill set was below par for fear of being disciplined by the regulator as it is them who monitor & maintain the current CET system. Dispensing optician

A number of respondents (13%) also suggested that **lack of time** was a barrier to reflective practice.

Time is a huge issue. The time it takes for proper reflection should not be underestimated.

Optometrist

Plus perceived lack of time - not wanting to travel far etc.

Dispensing optician

A further 12% of comments stated that **more guidance** was needed to overcome the barriers to reflective practice, such as online resources, examples and guidelines.

The understanding of reflection will vary by registrant. Perhaps there is an opportunity to provide examples/models for this so that they can find the way that works best for them. Possible route to advise presenters on methods of activating reflection.

**Education/training provider –
Postgraduate CET**

Some areas of learning need a level of peer or management agreement of what is the level of learning and if that learning is current and relevant.

**Education/training provider –
Postgraduate CET**

Figure 23 – Barriers to reflective practice – Additional comments

Base: Those who provided a response (181)

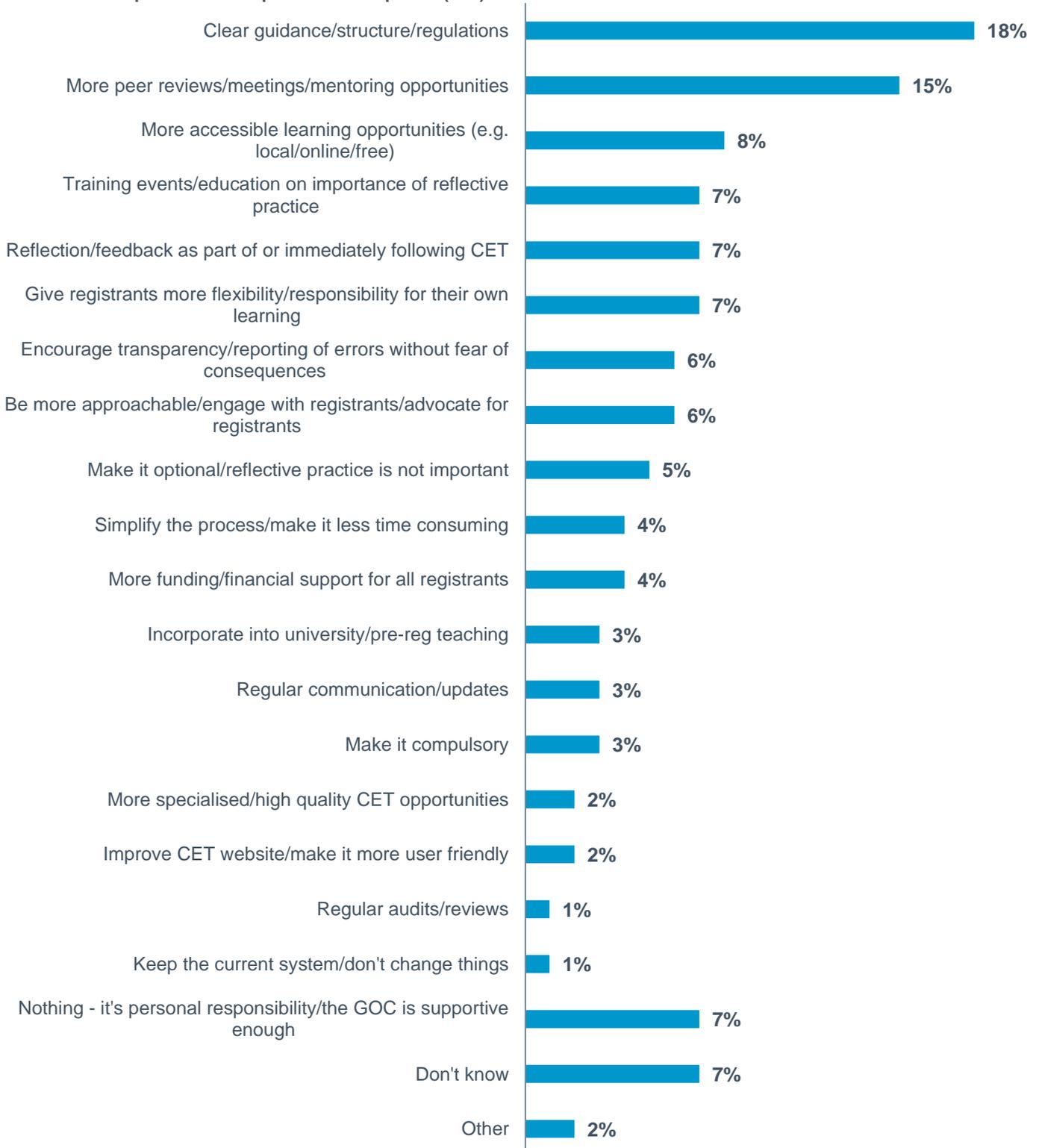
Additional comment	Number	Percentage
Fear of consequences of admitting mistakes/gaps in knowledge (e.g. fitness to practise, litigation)	31	17%
Lack of time/reflection takes too long	23	13%
More guidance needed (e.g. online resources, examples, guidelines)	21	12%
Ability to reflect depends on employer/working environment	19	10%
Registrants can reflect without having to document it/can manage own learning	12	7%
Peer review discussions/interactive CET helpful	12	7%
Difficult to assess own performance/weaknesses	11	6%
Reflection a tick box exercise/not done to benefit practice	10	6%
More difficult for those who qualified before reflection taught routinely	10	6%
Difficult for lone workers/locums	10	6%
Reflection useful/should be obligatory	9	5%
Reflection a personal skill/depends on personal drive	9	5%
All of the above are barriers	7	4%
GOC perceived as unapproachable/unsupportive organisation	7	4%
Reflection not helpful/a waste of time	7	4%
Cost/lack of financial support	6	3%
Too much delay between completion of CET and reflection	6	3%
Don't know	6	3%
Requirements too demanding/need to be simplified	5	3%
Commercial pressures	5	3%
Other	3	2%

2.6 Support to embed a culture of reflective practice

Respondents were asked what the GOC could do to support registrants in embedding a culture of reflective practice. Respondents were able to provide free-text responses, which have been thematically coded for analysis by grouping similar responses together, and are presented in the chart below.

Figure 24 – What more could the GOC do to support registrants in embedding a culture of reflective practice?

Base: All respondents who provided a response (591)



Almost one in five responses (18%) suggested that the GOC should provide **clear guidance, structure and regulation** to support registrants in embedding a culture of reflective practice, such as a defined definition of what reflective practice is, with a clear structure in place and guidance to achieve it.

*Create a GOC reflective learning cycle pro forma with situation/action/Insights/learning points/SMART objectives that when completed secures one CET point. **Optical Consumer Complaints Service***

*CET providers to provide reflection sheets Provide an acronym that they can follow, like pharmacists. **Education/training provider – Postgraduate CET***

*Provide examples/models for this so that they can find the way that works best for them. Possible route to advise presenters on methods of activating reflection. **Education/training provider – Postgraduate CET***

*Provide a more structured framework for registrants to refer to. A template may help. **Optometrist***

*Clearer guidance on what constitutes as reflective practice. **Dispensing optician***

One in seven (15%) suggested that having **more peer reviews, meetings and mentoring opportunities** would help support registrants.

*A mentoring scheme with CET points for both parties. **Optometrist***

*Promote peer discussion and peer review. Encourage mentoring. **Directorate of Optometric Continuing Education & Training***

A further 8% referred to the provision of **more accessible learning opportunities** that were either local, online or free of charge.

*Online CET should be provided twice in a month. **Dispensing optician***

*Free courses all over the UK for CET and peer review to get value for our money for registration. **Optometrist***

*The GOC could achieve this both through the CETs, emphasising the need to regularly discuss and reflect on incidents, lessons learnt and good practice, as well as providing supportive forums to do so, either through events or conferences or online. **The Royal College of Ophthalmologists***

In contrast, one in fourteen (7%) responses stated that the GOC should do nothing to support registrants in embedding reflective practice, explaining that this **should be the personal responsibility** of the registrant, or that the GOC already does enough to support registrants.

*This should come internally from the professionals, not the GOC. **Optometrist***

*Nothing more can the GOC do. The registrants have to embrace the culture and do more to help themselves in the interest of the patients and the profession. **Optometrist***

3. Views on the proposed changes to the CET scheme

3.1 Overview of the proposed changes

The GOC's current CET scheme approach tightly defines what it is that each registrant group needs to know, i.e. what is required of an optometrist as opposed to a dispensing optician. Each registrant group has different CET requirements based on the knowledge and skills they need to have for their job and how risky the profession is considered. There are four different sets of standards (also referred to as CET competencies) relating to each group of GOC registrants (optometrists, dispensing opticians, contact lens opticians, therapeutic prescribers).

The GOC has heard from stakeholders that the current scheme is not flexible enough to take account of changing roles within the professions. At the moment, registrants are required to do CET in relation to all the CET competencies, and these competencies focus primarily on clinical skills and knowledge, rather than covering all aspects of what it means to be an optical professional. Some stakeholders believe this approach is too prescriptive, as it restricts registrants from tailoring their CET activity to their own individual role, hindering genuine development.

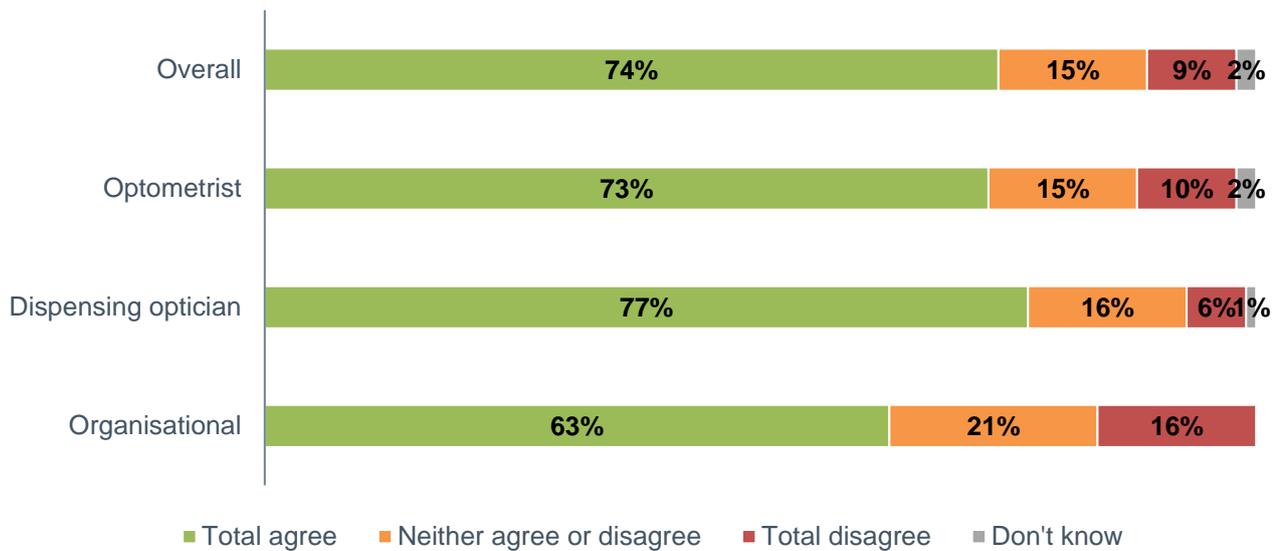
The GOC is therefore proposing to link CET requirements to more high-level learning outcomes based on the *Standards of Practice for Optometrists and Dispensing Opticians*. This would mean that rather than requiring registrants to do CET in relation to all the current competencies, registrants could tailor their CET to their current scope of practice.

3.2 Giving registrants more control over their learning and development

Three-quarters of respondents (74%) agreed with the GOC’s proposed approach of giving optometrists and dispensing opticians more control over their learning and development. Just 9% disagreed with this statement, including a slightly larger proportion of optometrist respondents (10%) when compared to dispensing opticians (6%). 12 of 19 organisations agreed with this proposal.

Figure 25 – To what extent do you agree or disagree with our proposed approach of giving optometrists and dispensing opticians more control over their learning and development?

Base: Overall (989); Optometrist (682); Dispensing optician (277); Organisational (19)



Respondents were able to provide additional free-text comments following this question, which have been thematically coded for analysis by grouping similar responses together, and are presented in the table on page 41.

A large proportion of comments (39%) explained that it was **important that optometrists and dispensing opticians ensure that skills and knowledge in core areas of practice are maintained to avoid de-skilling** as a result of allowing practitioners more control over their learning and development. A balance between allowing specialisation and maintaining core knowledge and skills was suggested in a number of comments, to ensure registrants continued to practise safely, whilst exploring more specialist areas of interest or relevance.

The idea of having area(s) of preferred specialism is a strong proposition. However, we feel that the maintenance of the core standards on a broad base. A blended approach of CET (minimum standards) and CPD (development of areas of specialist knowledge) is key.
Education/training provider – Postgraduate CET

We think it is still important to address core competency areas as mandatory but there should be allowance for specialist interests not being 'capped'.
Education/training provider – Postgraduate CET

I feel all competencies still need to be covered if we are to be responsible for these areas in practise.
Optometrist

Almost a quarter of comments (23%) related to the **risk of registrants becoming too specialised, avoiding certain topics that may not interest them, or being reluctant to work outside their comfort zone** as a result of allowing more control over learning and development. It was suggested that this could also lead to de-skilling in crucial areas of competency and a shortage of acquiring new skills.

The problem with allowing optometrists and dispensing opticians more control over their learning and development is that they are more likely to pick what they want to do and not necessarily pick what they need. It might be the case that they have a specific area of interest which they pursue but alongside this they are also seeing patients for whom they need to maintain competency in general areas. Allowing practitioners to fully design their own learning and development might mean that they deskill in some areas. **Optometry Northern Ireland**

The risk of not completing certain competencies because they aren't relevant to your current practice could then exacerbate the deskilling, and ultimately restrict future development. **Dispensing optician**

I feel there could be potential for practitioners to do CET about things they are comfortable with rather than learning new skills. **Optometrist**

Despite some concerns, significant proportions of comments said that the proposed approach would be **positive as it would allow registrants to focus on areas more relevant to their scope of practice** (19%), or that the proposal was generally a **good idea** (12%).

This is necessary to allow individuals to take responsibility to identify the right learning priorities, better supports reflective learning, and should make CET more agile and relevant to today's varied clinical practice. A key benefit of self-directed learning is that it will allow individuals to prioritise CET that meets the needs of their own mode of practice. **Association of Optometrists**

Linking CET to high level learning outcomes and standards allows for flexibility to undertake self-directed learning activities focused on developing skills that are most relevant to individual needs. **General Medical Council**

It makes sense for practitioners to be able to do more CET in the areas that are particularly relevant to their practice. **Optometrist**

Just 6% of comments directly **disagreed with the proposed approach**, and a further 7% stated that there was **insufficient information** to be able to agree or disagree.

There is sufficient scope to choose appropriate set within the current system. **Optometrist**

Agree we need control, but this would depend on what this would mean in real terms and how it was implemented. **Optometrist**

Figure 26 – To what extent do you agree or disagree with our proposed approach of giving optometrists and dispensing opticians more control over their learning and development? – Additional comments

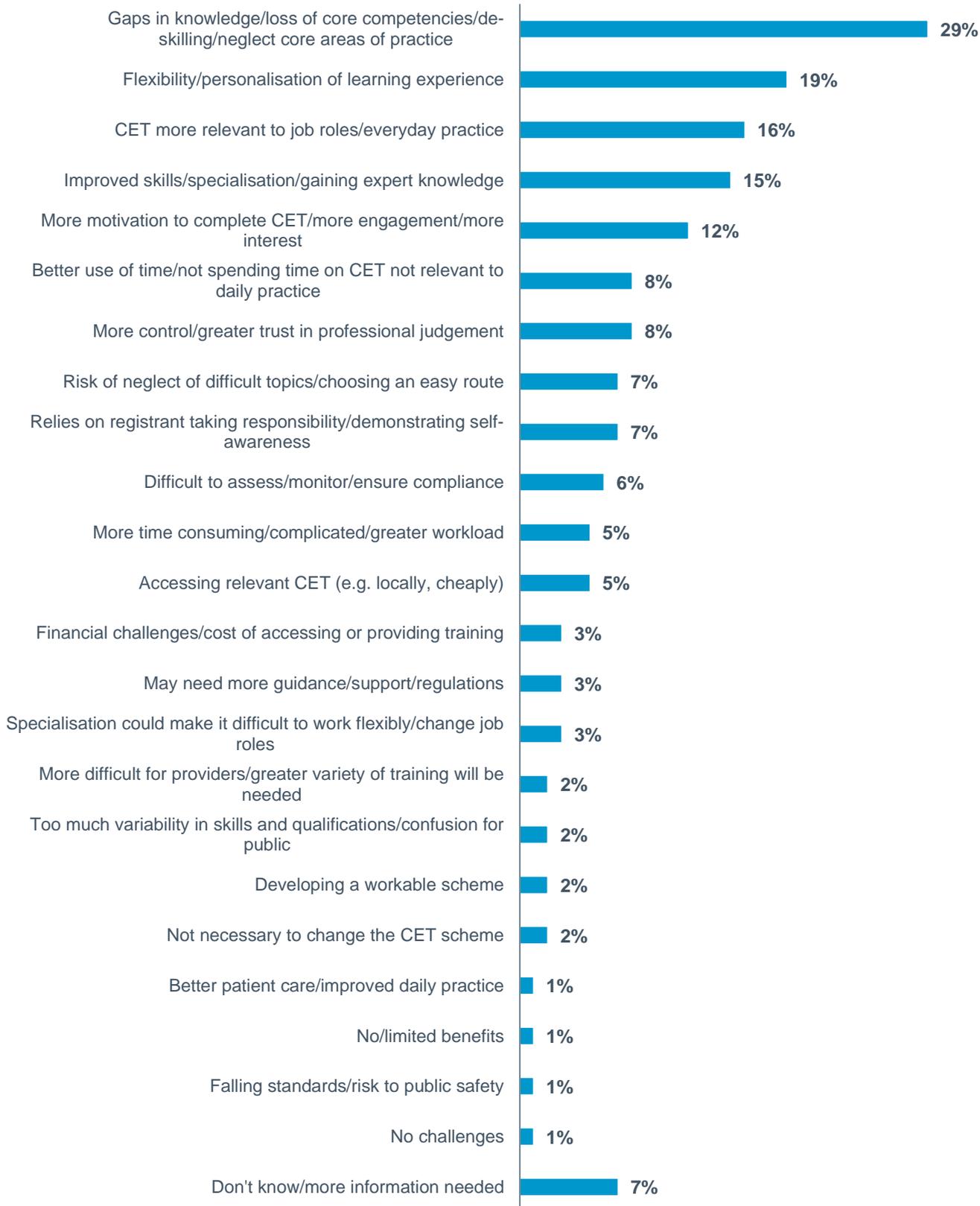
Base: Those who provided a response (265)

Additional comment	Number	Percentage
Core areas need to be kept up to date to avoid de-skilling	103	39%
Registrants may become too specialised/avoid certain topics/work within comfort zone	62	23%
Good if more relevant to current scope of practice	51	19%
Need to be flexible/current CET scheme is too prescriptive/restrictive	37	14%
Agree - Good idea	31	12%
Some registrants need encouragement to learn/will just do minimum	21	8%
Specialisation is positive	19	7%
Insufficient information - Depends on what this means in reality - More information needed	18	7%
Disagree - No changes required	15	6%
Guidance and support needed	7	3%
Will promote lifelong learning and development	5	2%
Roles are very different	4	2%
Other	26	10%

The survey asked respondents to suggest the benefits and challenges of moving towards the approach of giving optometrists and dispensing opticians more control over their learning and development. Respondents were able to provide free-text responses, which have been thematically coded for analysis by grouping similar responses together, and are presented in the chart below.

Figure 27 – What are the benefits and challenges of moving towards this approach?

Base: All respondents who provided a response (643)



A range of benefits and challenges were suggested. The largest proportion of responses (29%) related to the challenge of **gaps in knowledge, loss of core competencies, de-skilling and neglect of areas of practice**, should registrants be allowed to specialise in the areas they most commonly worked or were most interested in.

Allowing registrants to specialise in their own sphere of interest does risk losing sight of the basic core competencies that they should be able to undertake. For instance, an optometrist who doesn't like fitting contact lenses still needs to be able. Association for Independent Optometrists and Dispensing Opticians

What if other areas of competency suffer through lack of development? Optometrist

Registrant may lack in skills relating to competencies not used as regularly in practice, depending on location. Optometrist

However, one in five responses (19%) related to **the benefit of flexibility and personalisation of the learning experience**, and a further 16% said that it would allow registrants to **undertake CET more relevant to their job role/everyday practice**.

Makes it more tailored to each practitioners' need. Optometrist

More flexibility when choosing which areas to focus on. Every registrant has their own weaknesses and strengths. Optometrist

Flexibility, as no two people are the same. Dispensing optician

Practitioners will not have to waste time completing CET in topics that they do not practice, allowing them to complete more relevant CET. Optometrist

CPD becomes relevant to registrants' job. Registrants will not be required to cover competencies that are not relevant to their scope of practice. Gives registrants more ownership of their learning. Directorate of Optometric Continuing Education & Training

Some responses (15%) also referred to the benefit of **improved skills, specialisation and gaining expert knowledge**, whilst also being able to complete the required core competencies.

Enabling more focussed professional development means professionals can become more subspecialised which could help some to advance and practice safely as they change their scope of practice. It could also facilitate a more bespoke and interesting development path. Association for Independent Optometrists and Dispensing Opticians

This could lead to Optometrists specialising in certain areas of Optometry. The same would apply to Dispensing Opticians, could be a positive move. Optometrist

Enabling more focussed professional development means professionals can become more subspecialised which could help some to advance and practice safely as they change their scope of practice. The Royal College of Ophthalmologists

3.3 Aligning CET requirements for optometrists and dispensing opticians

Most CET requirements set for optometrists and dispensing opticians are the same. However, the GOC currently only requires optometrists and contact lens opticians to participate in a peer review activity in each CET cycle.

The aim of peer review is to embed a culture of reflection, discussion and learning to help improve standards and embed good practice. Peer review is also used as a tool to help reduce the risk of professional isolation or disengagement of healthcare professionals.

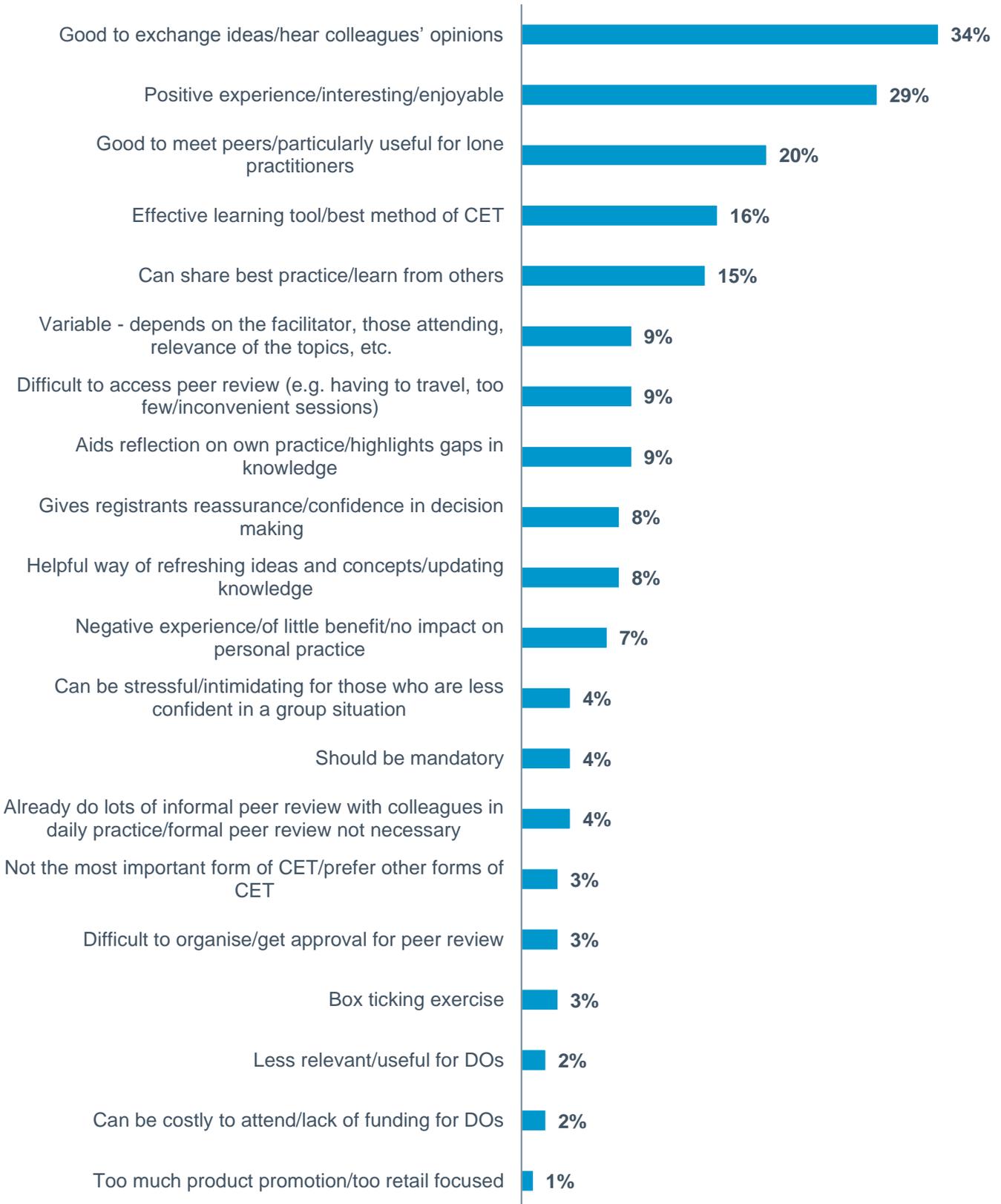
Peer reviews were introduced for optometrists in 2013 as a result of research commissioned by the GOC in 2010 which recommended that this could help mitigate against some of these risks. This research concluded that dispensing opticians were a lower risk profession, but since 2010 the work they carry out has diversified and many are expanding their skillset, for example, delivering low vision services to patients.

Although dispensing opticians in general are not required to undertake peer review, to date 76% have voluntarily completed peer review in the current 2016-18 cycle.

The GOC wants to ensure that the new CET scheme reflects changes that are happening in the sector and as far as possible aligns CET requirements for all registrants.

Optometrist and dispensing optician respondents were asked to comment on their experience of peer review and any benefits it has had on their practice. They were able to provide free-text responses, which have been thematically coded for analysis by grouping similar responses together, and are presented in the chart below.

Figure 28 – What is your experience of peer review and any benefits it has had on your practice?
 Base: Optometrist and dispensing optician respondents who provided a response (799)



A third of responses (34%) suggested in some way that it was **good to exchange ideas and hear colleagues' opinions** when listing any benefits of peer review. A further 20% also highlighted that peer review was of benefit as it **enabled them to meet peers**, which was of particular use for lone-working practitioners.

Peer review is useful for pooling ideas. Dispensing optician

Peer review is particularly useful...it encourages peers to exchange ideas which are very constructive. Optometrist

Helps me, as the only DO in a very busy practice, connect with other professionals. Dispensing optician

Beneficial especially as a solo practitioner. I rarely get to speak to peers unless it's at one of these events. Optometrist

Three in ten responses (29%) indicated that **peer review was a positive experience** that they found interesting and enjoyable. This response was provided by a larger proportion of optometrists (32%) when compared to dispensing opticians (22%)

Completed peer reviews in store and through ABDO. I personally find them really interesting & learn a lot. Dispensing optician

I love peer review. It is very beneficial. Optometrist

Whilst the majority of responses listed the benefits of peer review, some reported more **negative experiences** (7%), explaining that they found peer review to be of little benefit or that it had no impact on their personal practice.

I find peer review of little benefit. A nice social meet up with friends and colleagues followed by a drink or two afterwards, but of little long-term clinical benefit. Optometrist

I have participated in peer review once and it has made no difference to the way I practice. Dispensing optician

Larger proportions of responses from dispensing opticians suggested that **peer review was less relevant/useful for dispensing opticians** (6%, compared to 1% for optometrists) and that it **can be costly to attend or find funding for dispensing opticians** (5%, compared to 1% for optometrists).

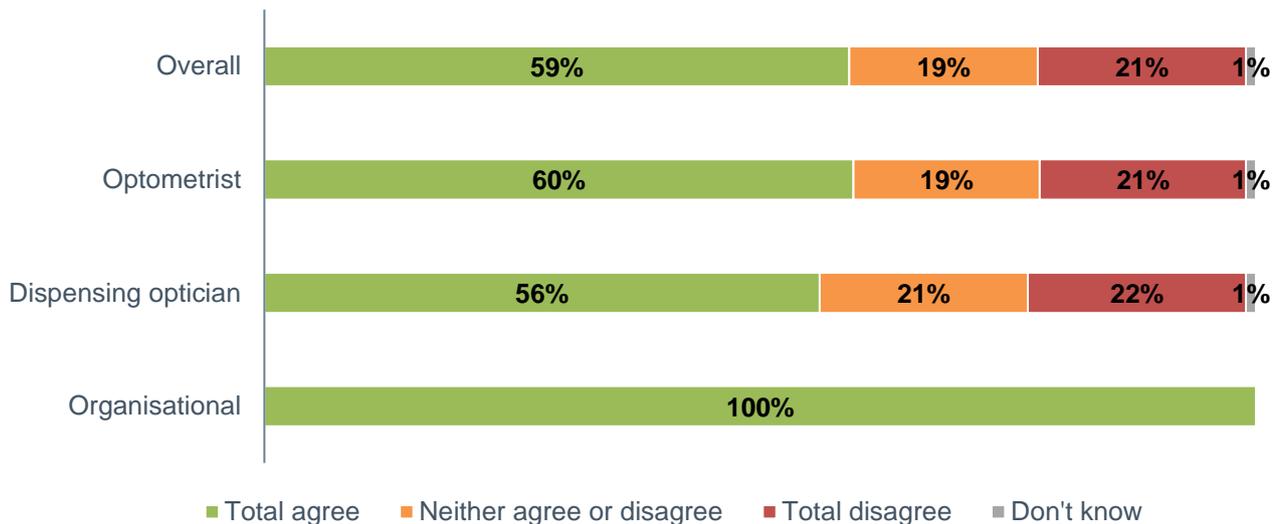
I have participated in peer reviews however, being a dispensing optician, much of what was discussed does not tick any of my learning goals. Dispensing optician

Quite simply it is a very unfair system, with optoms being funded and DO's not. Dispensing optician

Three in five respondents (59%) agreed that peer review should play a more central role in a scheme which aims to embed a concept of lifelong learning and reflection. One in five (21%) disagreed with this statement, and a further 19% said they neither agreed or disagreed. Similar results were recorded for optometrists and dispensing opticians. All 19 organisations who answered this question agreed.

Figure 29 – To what extent do you agree or disagree that peer review should play a more central role in a scheme which aims to embed a concept of lifelong learning and reflection?

Base: Overall (987); Optometrist (680); Dispensing optician (277); Organisational (19)



Respondents were able to provide additional free-text comments following this question, which have been thematically coded for analysis by grouping similar responses together, and are presented in the table overleaf.

One in five comments (21%) were statements indicating that **peer review was useful**. Some of these comments also indicated that the scheme should stay as it is currently as it works well.

I think peer review should still be included, but not increased.
Optometrist

Our members value the peer discussions and peer reviews we provide for them.
College of Optometrists

The opportunity to share thoughts in facilitated discussion continues to demonstrate a powerful way to influence ECP behaviour, when combined with proper reflection.
Education/training provider – Postgraduate CET

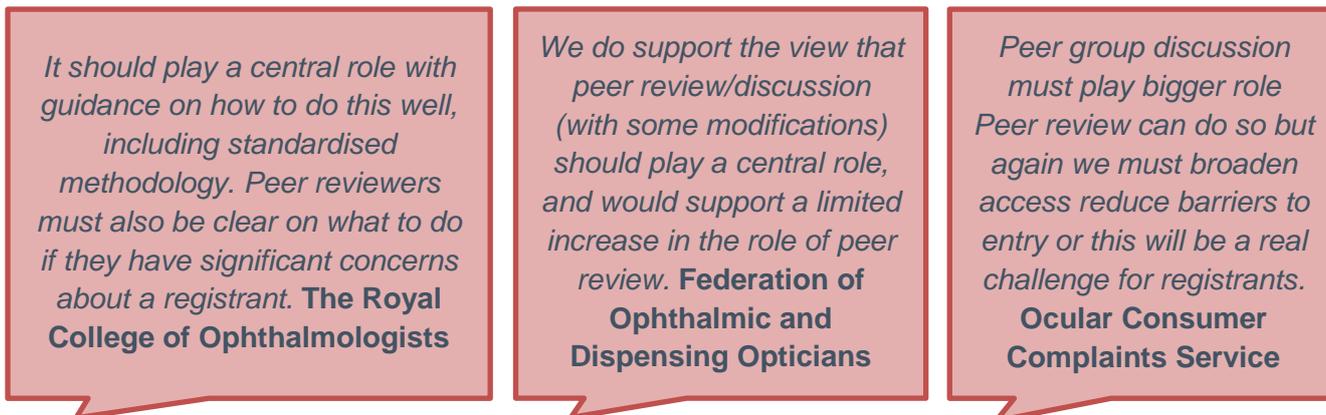
A further 15% of comments related to **issues accessing peer review**, including location and cost, and 8% suggested it was **difficult to find the time** to attend in an already very busy profession.

Accessibility to peer review can be challenging.
Optometrist

Very difficult to attend and expensive.
Dispensing optician

I agree however it is not always easy to attend these events given time constraints and other commitments therefore I wouldn't want to make it compulsory to have to do more than 1 peer review CET item.
Optometrist

A small proportion of responses (6%) suggested that there should be **more focus on peer review and that it should be given more importance**. This response came in particular from organisations.



However, 8% of responses, none of which came from organisations, suggested that **peer review should not be mandatory or central to CET**.

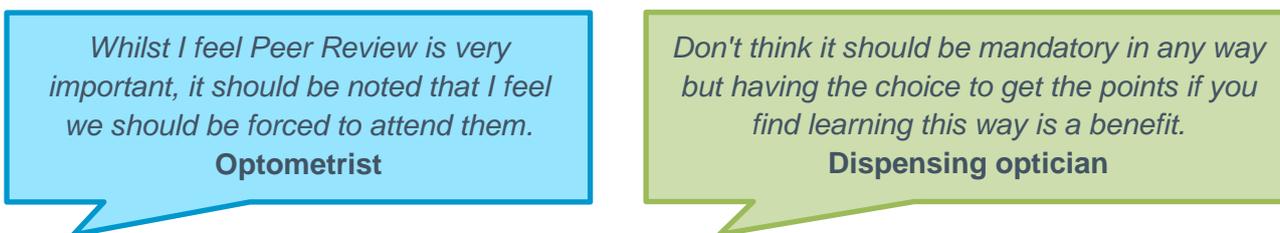


Figure 30 – To what extent do you agree or disagree that peer review should play a more central role in a scheme which aims to embed a concept of lifelong learning and reflection? – Additional comments

Base: Those who provided a response (212)

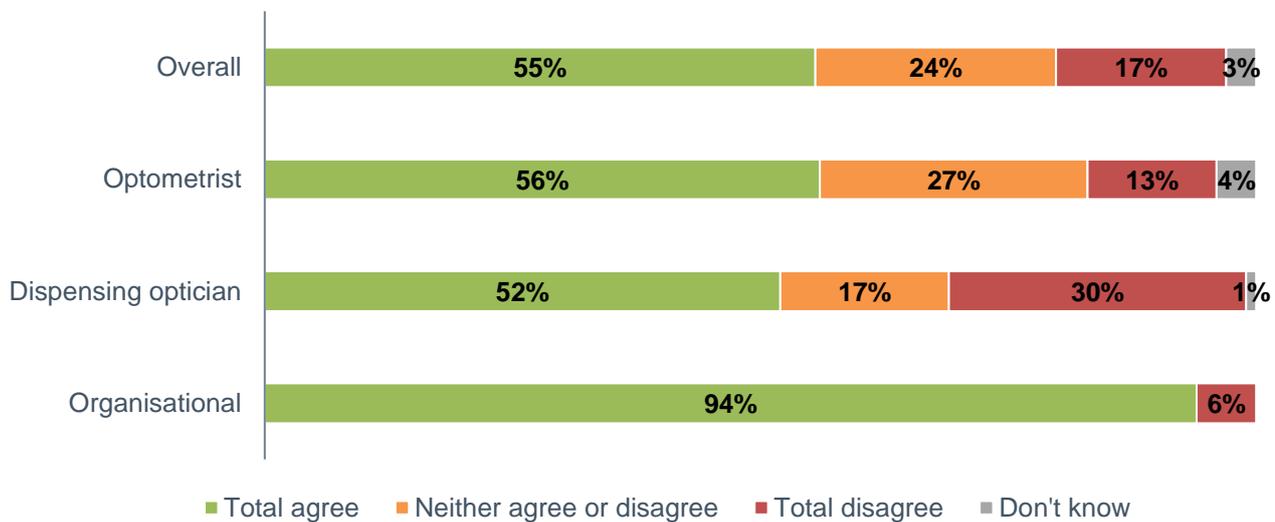
Additional comment	Number	Percentage
Peer review is useful	44	21%
Difficult to access/problems with locations/make easier to access	31	15%
Difficult to find time/too busy/too time consuming/already over-stretched	16	8%
Shouldn't be mandatory/central to CET	16	8%
Unnecessary/not always useful/does not suit everyone	15	7%
Want more/should be given more importance	12	6%
Difficult to arrange/to facilitate	10	5%
Should also be emphasis on other forms of learning/balance	10	5%
Should be online/use apps or social media	7	3%
Need for protected learning	1	0%
Other	61	29%

Over half of respondents (55%) agreed with the principle that that the GOC should have the same CET requirements for all fully qualified optometrists and dispensing opticians by introducing peer review for dispensing opticians. Almost one in five (17%) disagreed with this, including a larger proportion of dispensing opticians (30%) when compared to optometrists (13%). From organisations, 15 of 16 agreed with this statement.

A quarter of respondents (24%) said that they neither agreed nor disagreed with the introduction of peer review for dispensing opticians. This included a larger proportion of optometrists (27%) when compared with dispensing opticians (17%).

Figure 31 – To what extent do you agree or disagree with the principle that the GOC should have the same CET requirements for all fully qualified optometrists and dispensing opticians by introducing peer review for dispensing opticians?

Base: Overall (983); Optometrist (679); Dispensing optician (277); Organisational (16)



Respondents were able to provide additional free-text comments following this question, which have been thematically coded for analysis by grouping similar responses together, and are presented in the table overleaf.

The largest proportion of comments (24%) related to funding, with respondents explaining that there was **no funding for dispensing opticians to undertake CET**, or that **dispensing opticians should receive a grant** in the same way that optometrists do.

All groups including DOs should receive the financial benefits for CET as I understand optometrists have.
Dispensing optician

It is worth considering that if CET is to be made more onerous for dispensing opticians they should not be financially disadvantaged by it.
Optometrist

However, one in five (20%) comments suggested that introducing peer review would be **useful and beneficial** for dispensing opticians.

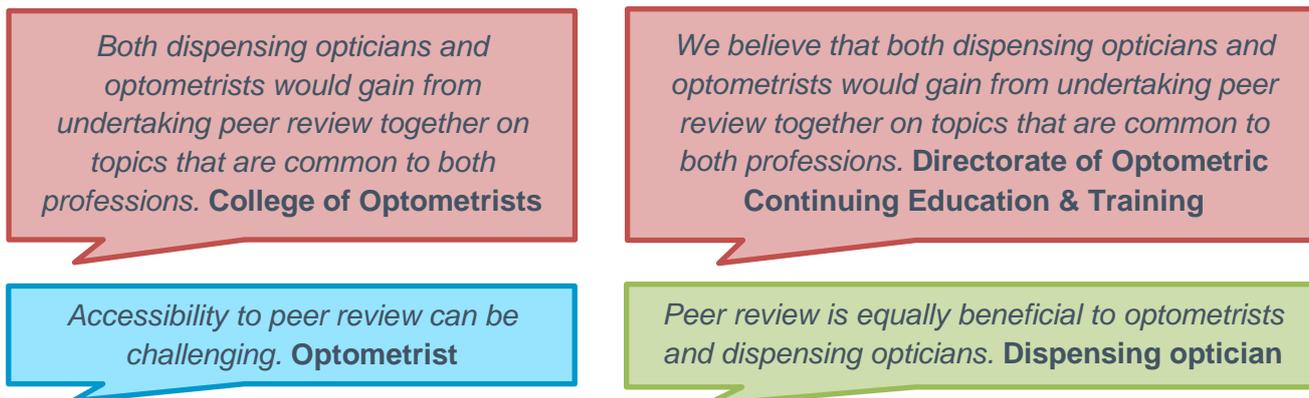


Figure 32 – To what extent do you agree or disagree with the principle that the GOC should have the same CET requirements for all fully qualified optometrists and dispensing opticians by introducing peer review for dispensing opticians? – Additional comments

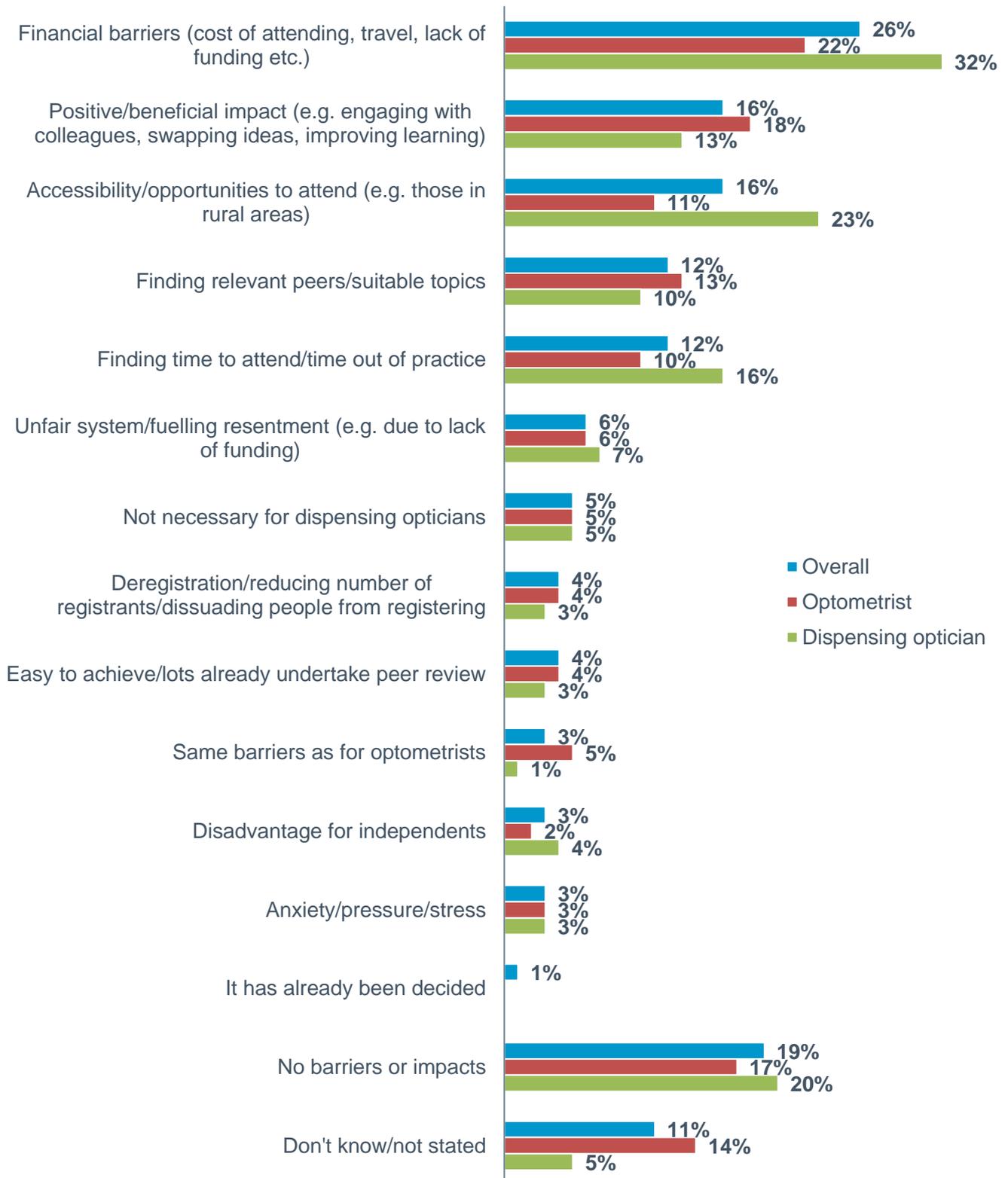
Base: Those who provided a response (210)

Additional comment	Number	Percentage
No grant or funding for dispensing opticians (DOs)/DOs should get grant	50	24%
Useful/beneficial for DOs	41	20%
DOs risk/responsibilities/skills not the same so shouldn't have same requirement	25	12%
Dispensing done by non-qualified staff/optical assistants	20	10%
DOs should decide for themselves/can't comment	15	7%
DOs and optoms should be accountable to same standards/be equal	14	7%
Thought requirements were already the same/DOs already do this	9	4%
Should not be compulsory	8	4%
Should be done asap/agree with it	5	2%
Other	35	17%

Respondents were then asked what impacts or barriers, if any, this policy would have on dispensing opticians. Respondents were able to provide free-text responses, which have been thematically coded for analysis by grouping similar responses together, and are presented in the chart below. The chart includes responses specific to optometrists and dispensing opticians to broadly highlight any differences.

Figure 33 – What impact and barriers, if any, would this policy have on dispensing opticians?

Base: All respondents who provided a response – Overall (549); Optometrist (340); Dispensing optician (191)



A quarter of responses (26%) focused on **financial barriers**, such as the cost of attending, travel expenses and the lack of funding. This barrier was suggested by a larger proportion of dispensing opticians (32%) when compared to optometrists (22%).

As dispensing opticians are unfunded there is a minor risk of introducing a barrier to remaining on the register. **Optical professional body**

Some may struggle to do peer review, due to lack of funding and availability, and may let their registration lapse. **Optometrist**

Would need equal CET grant as given to optometrist. **Dispensing optician**

As we don't receive CET grants or funding, and are being paid considerably less than most optometrists, financially would be the main impact for me. **Dispensing optician**

One in six (16%) highlighted the barrier of **accessibility and lack of opportunities to attend peer review for dispensing opticians**, for example, those working in more remote areas of the country. A further 12% also suggested that **finding time to attend** would be a barrier. Both these barriers were suggested by a larger proportion of dispensing opticians (23% and 16% respectively) when compared to optometrists (11% and 10% respectively).

For dispensing opticians in remote areas, or areas where little CET is currently available (Isle of Man, Scottish Highlands and Islands) I feel it could prove extremely difficult to attend peer review sessions. **Dispensing optician**

Depending on where the DO work this may be more difficult for them to gain. **Contact lens optician**

Time either out if practice or away from family/friends. **Dispensing optician**

Many dispensing opticians are part time primary care providers at home. Time constraints would be an issue. **Dispensing optician**

However, a significant proportion (16%) suggested that there would be **positive impacts of this policy**, such as engaging with colleagues, swapping ideas, improved learning, and recognising the importance of the dispensing optician role. This was suggested by a larger proportion of optometrists (18%) when compared to dispensing opticians (13%).

It gives DOs a more important role in practice and differentiates them from OAs. It would reinforce the mutual professional relationship between Optometrists and DOs. **Optometrist**

Impact can only be positive. **Education/training provider – Postgraduate CET**

It would give them a chance to discuss issues that were not clear-cut, which would build critical thinking and, therefore, clinical decision-making skills. **College of Optometrists**

4. Views on the proposed timeframe for introducing changes

4.1 The GOC's proposed timeframe

The current three-year CET cycle is due to finish on 31 December 2018. The GOC is currently proposing a 12-month transition year from 1 January to 31 December 2019, launching the new CET scheme on 1 January 2020.

During the 2019 transition year, registrants would be expected to continue to demonstrate that they are keeping their skills and knowledge up to date via the CET scheme, and the GOC will continue to ensure that its focus is on public protection and ensuring that public trust and confidence in the profession is maintained.

During the transition year, registrants will be expected to achieve a minimum of 12 CET points, six of which should be interactive. This approach is designed to reflect a pro-rata split of the normal requirements for a three-year cycle, i.e. 36 points over three years with half (18 points) achieved via interactive CET. Completion of CET competencies and peer review will not be mandatory during this time, but peer review is strongly encouraged.

The GOC has brought forward the timeframe for delivery based on the need to develop the CET scheme in order to ensure it keeps pace with the changes that are happening and continues to protect the public. The GOC wishes to work with stakeholders to ensure that this timeframe is realistic and achievable, recognising that successful delivery of a new CET scheme requires collaboration.

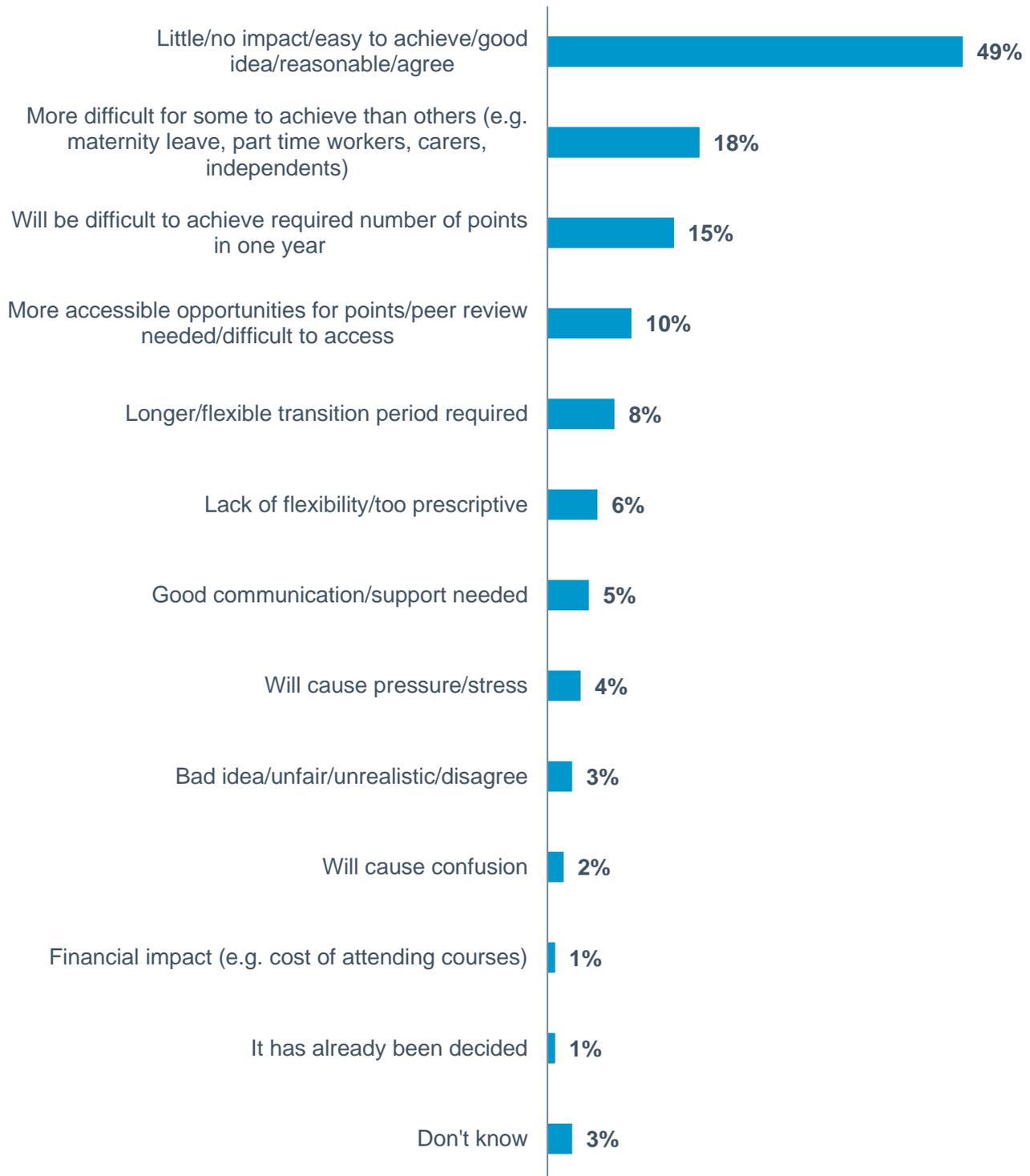
The consultation, therefore, asked stakeholders about their views on the proposed timeframe for introducing these changes.

4.2 Impact of the proposed one-year transition period

Respondents were asked what impact, if any, they thought there will be as a result of the proposals for a one-year transition period where registrants will be expected to complete the CET as outlined in section 4.1. Respondents were able to provide free-text responses, which have been thematically coded for analysis by grouping similar responses together, and are presented in the chart below.

Figure 34 – What impact, if any, will there be as a result of proposals for a one-year transition period where registrants will still be expected to complete CET as outlined above?

Base: All respondents who provided a response (705)



The largest proportion of responses (49%) stated that there would be **little or no impact**, that it would be **easy to achieve the requirements within a one-year transition period**, or that the proposals were a **good or reasonable idea**.

It is not an unreasonable target to meet in a year.
Optometrist

Since you say that we are not expected to cover all the competencies it shouldn't be a problem.
Dispensing optician

No impact foreseen as long as this is well communicated.
Oakmead Opticians (optical business registrant)

We agree with the GOC setting an expectation for registrants to achieve 12 points during the transition year, including at least 6 interactive points.
Association of Optometrists

I think this is reasonable. To wait three years to replace the scheme is too long, yet a new scheme could not properly be put in place in such a short time frame and that the proportioned requirement for 12 months is appropriate.
Optometrist

However, small proportions of responses focused negative impacts or concerns. A significant minority (18%) suggested that **some registrants may find it more difficult to achieve the requirements than others**, such as those on maternity leave or those working part time.

We consider that this time frame is realistic and achievable. However, some allowance needs to be provided for practitioners with special circumstances (e.g. those on maternity leave, long term sick leave etc.)
Optometry Northern Ireland

Those who are on a career break or maternity leave may find it difficult to achieve the requirements.
Optometrist

The exceptions would be registrants on maternity leave or with illness.
Federation of Ophthalmic and Dispensing Opticians

Difficult for those who work part time or have very young children or are off sick for the year.
Dispensing optician

Some responses (15%) also highlighted that it **may be difficult to achieve all of the required number of CET points each year**, particularly interactive points.

As a dispensing optician, the most difficult thing will be to obtain 50% of CET points as interactive in the space of one year.
Dispensing optician

Because the minimum is currently six points in a year, some registrants may find 12 difficult, so will need maximum notice.
College of Optometrists

A higher risk that registrants don't meet the 12-point expectation, and that their practice is affected as a result.
Association of Optometrists

6 interactive points in a year is a lot - some prefer to attend 1 or 2 courses over a 3-year cycle.
Optometrist

One in ten (10%) responses said that there would need to be **more accessible opportunities to gain CET points and peer review**, as this was already difficult to access for some registrants, particularly those living in more rural areas.

Potential difficulties with CET provision and accessibility. Especially for Dispensing Opticians, who have to complete CET at their own cost.

Contact lens optician

None, so long as you provide enough opportunities to get interactive CET if you practice outside the main urbanisations.

Some responses, particularly those from organisations, also suggested that **the transition period should be longer or more flexible** (8%). Suggestions included a two or three-year transition period.

A three-year transition would be far more sensible. In fact, there is no good reason or advantage for a one-year pressurised change-over period that I can think of for anyone.

Optometrist

We would query whether two transition years would be any more beneficial than another three-year cycle.

Federation of Ophthalmic and Dispensing

The GOC should urgently review whether the CET reforms can be fully delivered by January 2020. If not we think it would be preferable to begin another three-year cycle in 2019 rather than risk needing two transitional years before the next cycle.

Association of Optometrists

Sensible decision to do transition year. I fear it may need to be two years.

Optical Consumer Complaints Service

Other responses (6%) indicated that **the transition period proposal was not flexible enough and too prescriptive**, and would therefore be difficult for registrants to achieve.

Forcing all the interactive points to be broken down into an even spread means less flexibility in obtaining them, yet elsewhere there is a suggestion of trying to improve flexibility in the learning choices.

Optometrist

Not flexible to take into account lifestyle changes such as childcare, caring responsibilities, illness, relocation.

Dispensing optician

A number of responses (5%), particularly from organisations, explained that **the transition period would require good communication with and support for registrants** to ensure they understand and complete it correctly.

We see no negative impact, other than need to ensure this is well communicated and understood by those completing education and those delivering it.

Education/training provider – Postgraduate CET

It must be clearly publicised to ensure registrants understand the requirements.

Directorate of Optometric Continuing Education & Training

As long as there is extensive coverage for registrants on what the new scheme will consist of, why change was necessary and what will be different.

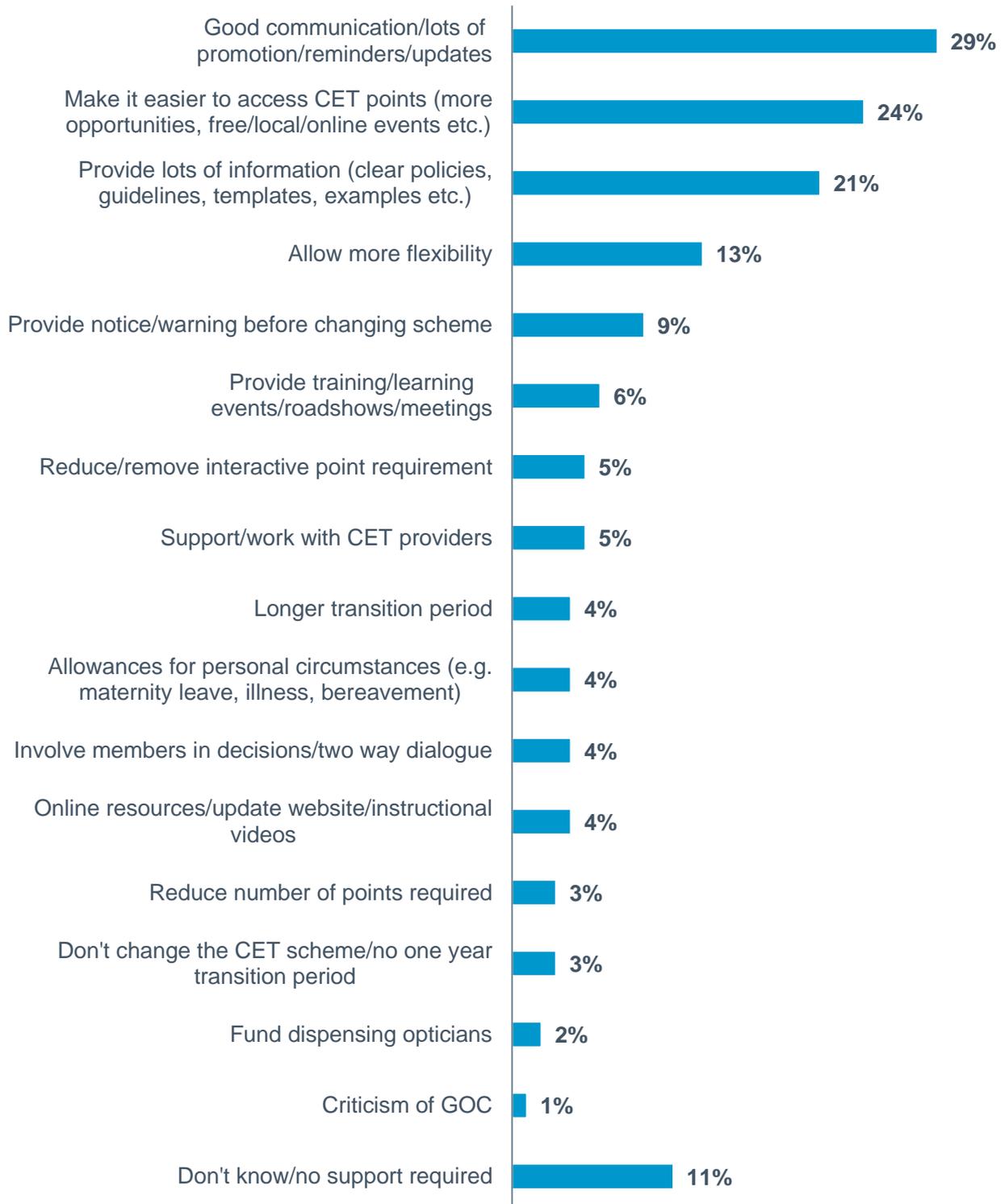
Association for Independent Optometrists and Dispensing Opticians

4.3 Support from the GOC

Respondents were asked how the GOC could best support stakeholders during the transition year and into a new scheme starting in January 2020. Respondents were able to provide free-text responses, which have been thematically coded for analysis by grouping similar responses together, and are presented in the chart below.

Figure 35 – How could the GOC best support stakeholders during the transition year and into a new scheme starting in January 2020?

Base: All respondents who provided a response (574)



A common response (29%) was that the GOC should **ensure good communication about the transition**, including promotion, reminders and updates. A further 21% suggested that the GOC should **provide lots of information** such as clear policies, guidelines, templates and examples.

*Communication is critical to ensure registrants are well supported. **Education/training provider – Postgraduate CET***

*The GOC should be clear and timely in its communications to registrants about the transition period, the expectations on them and the further changes planned for 2020. **Association of Optometrists***

*Keep us well informed about what the new CET will entail so we know what to expect before January 2020. **Dispensing optician***

*Provide a clear statement for registrants that we can share, or direct them to. **Directorate of Optometric Continuing Education & Training***

*Show examples of what we should be working towards, and the benefits. **Optometrist***

*Regular automated emails from MyCET reminding registrants of their current CET acquirement & points yet to do. **Optometrist***

*Provide sufficient guidance **Directorate of Optometric Continuing Education & Training***

A quarter (24%) of responses said the GOC should **make it easier to access CET points**, including more opportunities for free, local or online events.

*Make sure there's a lot of online CET available free. **Optometrist***

*Work closely with ABDO to help us access interactive learning. **Dispensing optician***

*Engage with external providers of education, to ensure there is adequate access to peer discussion/review sessions. Industry can help support the process. **Optical business registrant***

One in eight (13%) responses highlighted that more **flexibility should be allowed**, particularly for those registrants who may struggle to achieve the required number of CET points during the transitional phase.

*A bit of leniency if some registrants are not able to get all the points in one year. **Dispensing optician***

*Allow flexibility on the requirements if registrants have a genuine reason for having difficulty completing them. They should not be put in a worse situation because the scheme is changing. **Optometrist***

A number of responses, particularly from organisations, said that as much notice should be provided as possible to ensure that registrants are able to successfully adapt to the transitional period and into a new CET scheme.

*Give us as much notice as possible of the new scheme requirements so we can implement in time for January 2020. **Directorate of Optometric Continuing Education & Training***

*Timely communication to registrants and providers in advance of the 2020 scheme, to allow implementation, training and understanding. **Optical professional body***

5. Key findings

There are generally positive attitudes towards the current CET scheme, with some suggestions to improve accessibility

Attitudes towards the current CET scheme are generally positive, particularly from optometrists and dispensing opticians. The majority of consultation respondents agreed that it has positive impacts, including allowing development to keep pace with changes, allowing flexibility, encouraging professional development, improving practice, helping registrants to keep up to date and plugging gaps in their knowledge. However, the opinion of organisations appears to be less positive about the current CET scheme, particularly in relation to allowing flexibility to undertake CET in relation to individual scope of practice and helping to encourage professional development.

A significantly smaller proportion of all stakeholders agreed that the current CET scheme helps to build and maintain public trust and confidence in the optical professions. Whilst this may highlight an area that the new CET scheme can seek to improve upon, it is important to note that a significant proportion of respondents neither agreed or disagreed with this statement.

Despite generally positive attitudes towards it, some suggestions for improvements to the current CET scheme have been made, with a particular focus on providing more accessible learning opportunities at a local level, online, or free of charge, to make it easier to achieve the required number of points.

Stakeholders focus on clinical risks as the riskiest areas of practice

The areas of work carried out by optometrists and dispensing opticians that are perceived to be the riskiest mostly fall into the category of clinical risks, particularly the detection of disease and missed pathology, emergencies and identifying and managing eye disease.

Stakeholders believe there is a risk of de-skilling, but that this can be mitigated by maintaining core areas of knowledge and skill

A significant proportion of stakeholders perceive there to be a risk of optometrists and dispensing opticians de-skilling in some areas of practice. Stakeholders feel this is driven by increased use of technology and automation, which mean registrants are not regularly conducting tasks such as retinoscopy and refraction, and therefore are de-skilling in these procedures. Similarly, not regularly utilising skills and knowledge in other areas of everyday practice is also driving the risk of de-skilling, with a number of optometrists highlighting that they infrequently fit contact lenses or conduct any dispensing, and therefore feel de-skilled in these areas.

De-skilling is also perceived to be a potential risk of the GOC's proposed approach of giving registrants more control over their own learning and development, where registrants may choose to become too specialised, avoid topics which are not of relevance or interest to them, and not work outside their comfort zone, thereby de-skilling in important areas of practice.

The majority of stakeholders believe there to be core areas of practice that knowledge and skills should be kept up to date to combat de-skilling within the current CET scheme. Particular focus was given to the areas of pathology and ocular disease, and developments in technology and products, but many stakeholders also suggested that knowledge and skills should be kept up to date in all relevant areas of practice.

To combat the risk of de-skilling as a result of giving registrants more control over their own learning and development, many stakeholders suggested that core areas of practice must be maintained by all, to ensure professionals are safe to practise.

Stakeholders feel more could be done to promote and enable a culture of lifelong learning and reflection

Whilst the majority of stakeholders agreed that the current CET scheme promotes a culture of lifelong learning and encourages registrants to reflect on their practice, either through the scheme itself or because of its current name, the consultation shows that there is room for improvement. Key comments from those who were less positive about the current scheme's ability to promote lifelong learning and reflection suggested that it is viewed by some within the profession as a box-ticking exercise and that there are problems with the motivation of some individuals to learn.

Furthermore, some stakeholders, particularly organisations, feel that naming the scheme 'Continuing Professional Development' may be more effective at promoting a culture of lifelong learning, and using this name would also be in line with other healthcare professions.

Opinion is also divided about how helpful the GOC's tools to help registrants reflect on their practice are, and large proportions of stakeholders identified barriers to reflective practice. Barriers included a lack of guidance, support and a lack of clarity around the concept of reflection and the benefits, and a fear of being open and honest about where improvements could be made, highlighting further room for improvement.

A number of suggestions from stakeholders were made for how the GOC could support a culture of reflective practice for registrants, including providing clear guidance, structure and regulation, and making opportunities for reflection more accessible.

There is significant appetite from stakeholders for registrants to have more control over their own learning and development, but the correct balance between autonomous and mandatory learning needs to be established to prevent de-skilling

The majority of stakeholders, including registrants and organisations, agreed with the GOC's proposed approach of giving registrants more control over their own learning and development, allowing optometrists and dispensing opticians to focus on areas more relevant to their everyday practice and specialise in important areas.

However, for many stakeholders, as previously highlighted, this support appears to be heavily caveated on the condition that registrants maintain their skills and knowledge in core areas of practice to avoid de-skilling and putting patients at risk. It was repeatedly suggested that increased autonomy in learning and development could lead to over-specialisation and the

neglect of core competencies, or alternatively the potential for more focus on ‘comfortable areas’ resulting in a lack of gaining new knowledge and skills.

The right balance between enabling registrants to have more autonomy in their learning and development and continuing to maintain core areas of practice is therefore required. This will enable increased development towards new knowledge and skills, whilst ensuring patient safety and that registrants are well-rounded in key areas of practice.

Attitudes towards increased focus on peer review are more mixed, particularly from dispensing opticians

Whilst the majority of stakeholders, including all organisational responses, agreed that peer review should play a more central role in the CET scheme to embed a concept of lifelong learning and reflection, significant numbers disagreed with this proposal. Reported experiences of peer review were generally positive, but a number of stakeholders highlighted that peer review was difficult to access and to find the time to complete, leading them to question whether it should play a more central role than it already does.

Only a small majority agreed that peer review should be introduced for dispensing opticians, although almost all organisational responses agreed. However, a larger proportion of dispensing opticians disagreed with this proposal when compared with optometrists. The main concerns related to funding for dispensing opticians to undertake peer review (particularly the perceived inequality of funding between optometrists and dispensing opticians), the relevance of peer review for dispensing opticians, and accessibility of peer review opportunities.

Organisational responses appeared much more supportive of the GOC’s proposal to have peer review play a more central role for both optometrists and dispensing opticians.

A one-year transition period is generally seen as achievable, but important impacts of this have been highlighted for certain registrants who may be working part time, on maternity leave or living in rural areas

It is positive to note that the largest proportion of stakeholder responses indicated that the proposal of a one-year transition period would be easy to achieve or would have little or no impact. However, a number of important impacts of this proposal have been highlighted by stakeholders, particularly the difficulty to achieve the required number of CET points within the transition period for certain registrants, such as those on maternity leave, working part time or working independently.

Communication is seen as key to the success of the transition year and new CET scheme implementation

Many stakeholders suggested that good communication was crucial to supporting stakeholders during the transition year and into a new scheme, including lots of promotion, reminders and updates, supported by clear policies, guidelines, templates and events. A number of organisations highlighted that as much notice as possible should be provided to ensure the transitional period is successful. Additionally, many stakeholders felt that the GOC should make it easier to access CET in order to achieve the required number of points during the transition year.

Appendix A – Consultation questionnaire

Fit for the Future: Lifelong Learning Review

Overview

This consultation seeks stakeholder views on our Continuing Education and Training (CET) scheme. Our aim in consulting is to gain your views on how our CET scheme can successfully evolve to help meet the challenges of the future.

As the regulator for optometrists and dispensing opticians we have a responsibility to ensure that:

- our registrants maintain and develop their knowledge, skills and behaviours throughout their professional careers (sometimes referred to as continuing professional development (CPD)); and
- our registrants continue to be fit to practise (sometimes referred to as revalidation).

Our CET scheme covers both continuing professional development and revalidation.

Demonstrating that registrants continue to practise safely and meet professional standards is an important element of building and maintaining public trust and confidence in the optical professions.

For more information about our CET scheme please follow this [link](https://www.optical.org/en/Education/CET/index.cfm)

[<https://www.optical.org/en/Education/CET/index.cfm>](https://www.optical.org/en/Education/CET/index.cfm)

Why we are consulting

Our current CET scheme was introduced in 2013, but the optical sector has changed since then and the work optometrists and dispensing opticians carry out has expanded and diversified. We want to make sure that our CET scheme evolves, supports our registrants' learning and development needs, and continues to maintain the safety and quality of care patients receive.

We have already heard from stakeholders via previous engagement activities, for example, from our **Education Strategic Review** [<https://www.optical.org/en/Education/education-strategic-review-esr/index.cfm>](https://www.optical.org/en/Education/education-strategic-review-esr/index.cfm) consultations that our CET scheme could do more to promote and embed a culture of learning, development and improvement in the professions. We have also heard a great deal of support for bringing forward changes to the CET scheme so that they better align with the changes we are making to the system of education and training leading to registration with the GOC.

We would like to hear your views on the proposals in the consultation to help us develop and finalise our policy changes - the consultation is divided into three main parts:

- Section 1: Views and understanding of the current CET scheme
- Section 2: Views on the proposed changes to the CET scheme
- Section 3: Views on the proposed timeframe for introducing changes

We encourage you to respond to all the questions, but you are free to respond to as many or as few as you choose.

Tell us who you are

1 What is your name?

Name

2 What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

Email

3 Are you responding as an individual or an organisation?

(Required)

Please select only one item

Individual Organisation

Individual

It is helpful for us to know a bit more about who you are.

4 Which category best describes you?

(Required)

Please select only one item

- Member of the public Optical patient Optometrist Dispensing optician
 Student - optometry Student - dispensing Other (please specify below)

Other please specify

Organisation

It is helpful for us to know a bit more about which organisation you are responding on behalf of.

5 What is your organisation?

Organisation (Required)

6 Which category best describes your organisation?

(Required)

Please select only one item

- Optical business registrant Other optical employer
 Education/training provider - undergraduate/pre-registration
 Education/training provider - postgraduate/CET Optical professional body
 Optical defence/representative organisation Optical insurer
 Commissioner of optical care Healthcare regulator
 Other (please specify below)

Other please specify

Section 1: Views and understanding of the current CET scheme

In this section we would like to hear your views about how well the current CET scheme is working.

The optical sector continues to evolve since we introduced our current CET scheme in 2013. There is an increasing demand for eye care services particularly as the population is both increasing and ageing. To help meet this demand we have seen optometrists and dispensing opticians across the UK expand their skill set and gain additional qualifications enabling them to deliver a wide range of eye care services in community and hospital settings as part of multi-disciplinary teams.

Technological advancements are also impacting on the way eye care services will be delivered both now and in the future. Technology is being used to replace roles traditionally carried out by optometrists and dispensing opticians, such as during the sight test and in dispensing spectacles to patients. The use of technology and artificial intelligence will continue to change the way diseases such as diabetic retinopathy and glaucoma are diagnosed and monitored in future.

These developments are impacting on the work optometrists and dispensing opticians carry out and the skill set they need for modern practice. We need to ensure that our CET scheme keeps pace with these changes and continues to help improve the safety and quality of care patients receive.

For more information about our CET scheme please follow this **link**

<<https://www.optical.org/en/Education/CET/index.cfm>>

Understanding risks in the optical sector and the role of revalidation

We use the process of revalidation to demonstrate that GOC registrants remain fit to practise throughout their professional careers. Our current CET scheme requires fully qualified optometrists and dispensing opticians to demonstrate that they are keeping their skills and knowledge up to date and remain fit to practise.

Our CET scheme was informed by research we carried out into risks associated with opticians in 2010, to help ensure registrants undertook CET and maintained their skills and knowledge in areas of practice that were considered riskier. As we have mentioned, the profession has changed since 2010 and the work optometrists and dispensing opticians are carrying out is more varied, more challenging and potentially more high-risk.

8 What do you think are the riskiest areas of work carried out by optometrists and dispensing opticians? How well does the CET scheme address these risks?

Please provide comments

9 Do you think that there is a risk that optometrists and dispensing opticians may be de-skilling i.e. losing their skills and knowledge in some areas of practice?

Please select only one item

Yes No Don't know

Additional comments

10 Are there any core areas of practice that optometrists and dispensing opticians should keep their skills and knowledge up to date in?

Please select only one item

Yes No Don't know

Additional comments

Lifelong learning and reflection

We want to promote and emphasise the concepts of lifelong learning and professional development within our CET scheme. As part of being a healthcare professional, our registrants should take time to reflect on their practice and identify areas in which they could improve or develop. This reflection should then be used to plan their CET.

Our current scheme offers some support for registrants to reflect on their practice, but we want to develop and instill a concept of lifelong learning and reflection so that registrants become responsible for their own learning, reflection and CET planning.

We have had feedback from stakeholders through previous engagement activities that there is a perception that our current CET scheme is aimed at maintaining a 'safe beginner' level rather than driving forward a culture of learning and improvement throughout a registrant's professional career.

11 To what extent do you agree or disagree with the following statements?

	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Don't know
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The GOC's current CET scheme intends to promote and embed a culture of lifelong learning and encourages registrants to reflect on their practice.

<input type="checkbox"/>						
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The name of the current scheme, Continuing Education and Training (CET), helps to promote a culture of lifelong learning and reflection.

<input type="checkbox"/>						
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Additional comments

Lifelong learning and reflection (continued)

There are a number of tools that registrants are currently able to use to help them reflect on their practice:

- At the beginning of each CET cycle, registrants are asked to complete a scope of practice questionnaire to help them think about their own particular scope of practice and are asked to think about what learning and development they may want to do in next cycle.
- Registrants are expected to complete a personal development plan for each three year CET cycle, which they should use to reflect on their practice, plan their CET and review how well it went.
- Registrants must complete a reflective statement when they attend a peer review event or a peer discussion to capture their learning. Peer review is a type of CET activity which allows registrants to discuss cases or scenarios with colleagues and learn from experiences they may have faced in clinical practice. A peer review event can be a registrant-led peer review group or a peer discussion delivered by a CET provider.
- Registrants can voluntarily reflect on their practice at any point and add a reflective statement on the CET system.
- Registrants can add non-CET activities to their personal development plan.

12 Are these tools helpful?

Please select only one item

Yes No Don't know

Additional comments

13 Are there any barriers that could make it difficult for optometrists and dispensing opticians to reflect on their practice?

	Yes	No	Don't know
A lack of guidance or support	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A lack of clarity around the concept of reflection and the benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fear of being open and honest about where improvements could be made	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional comments

14 What more could the GOC do to support registrants in embedding a culture of reflective practice?

Comments

Section 2: Views on the proposed changes to the CET scheme

In this section we are asking for views about the changes we are proposing to make to the CET scheme.

Accommodating changing scopes of practice in the optical sector

Our current CET approach tightly defines what it is that each of our registrant groups need to know, i.e. what is required of an optometrist as opposed to a dispensing optician. Each registrant group has different CET requirements based on the knowledge and skills they need to have for their job and how risky the profession is considered.

We have four different sets of standards (also referred to as CET competencies) relating to each group of GOC registrants:

- Optometrist
- Dispensing opticians
- Contact lens opticians (this is an additional specialty qualification for dispensing opticians)
- Therapeutic prescribers (this is an additional specialty qualification for optometrists)

For more information please visit our **website** <<https://www.optical.org/en/Education/CET/cet-requirements-for-registrants.cfm>>

The roles of our registrants are changing rapidly within the modern healthcare context and many are undertaking areas of practice they may not have done before. We have heard from stakeholders that our CET scheme is not flexible enough to take account of changing roles within the professions. At the moment, registrants are required to do CET in relation to all the CET competencies, and these competencies focus primarily on clinical skills and knowledge rather than covering all aspects of what it means to be an optical professional. We have heard that this approach is too prescriptive as it restricts registrants from tailoring their CET activity to their own individual role, which in turn hinders genuine development.

We are proposing to link our CET requirements to more high-level learning outcomes based on our **Standards of Practice for Optometrists and Dispensing Opticians**

<https://www.optical.org/en/Standards/Standards_for_optometrists_dispensing_opticians.cfm> .

This approach would be consistent with the learning outcomes we are developing (through the **Education Strategic Review** <<https://www.optical.org/en/Education/education-strategic-review-esr/index.cfm>>) for education prior to joining the register. This would mean that rather than requiring registrants to do CET in relation to all the current competencies, registrants could tailor their CET to their current scope of practice.

Subject to the outcome of this consultation showing support for our proposed approach, we plan on consulting on a draft set of learning outcomes in 2019.

15 To what extent do you agree or disagree with our proposed approach of giving optometrists and dispensing opticians more control over their learning and development?

Please select only one item

- Strongly agree Agree Neither agree or disagree Disagree
 Strongly disagree Don't know

Additional comments

16 What are the benefits and challenges of moving towards this approach?

Comments

Aligning CET requirements for optometrists and dispensing opticians

Most of the CET requirements we set for optometrists and dispensing opticians are the same, for example, both must obtain 36 CET points over a three year cycle and 18 of these points must be gained through interactive CET events. However, we only require optometrists and contact lens opticians to participate in a peer review activity in each CET cycle.

The aim of peer review is to embed a culture of reflection, discussion and learning to help improve standards and embed good practice. Peer review is also used as a tool to help reduce the risk of professional isolation or disengagement of healthcare professionals.

We decided to introduce peer review for optometrists in 2013 as research we commissioned in 2010 recommended that this could help mitigate against some of these risks. At the time the research concluded that dispensing opticians were a lower risk profession but since 2010 the work they carry out has diversified and many are expanding their skillset, for example, delivering low vision services to patients.

It should be noted that while dispensing opticians in general are not required to undertake peer review, to date 76% have voluntarily completed peer review in the current 2016-18 cycle.

We want to ensure that our new CET scheme reflects changes that are happening in the sector and as far as possible aligns CET requirements for all our registrants.

17 If you are responding as an optometrist or dispensing optician, what is your experience of peer review and any benefits it has had on your practice?

Comments

18 To what extent do you agree or disagree that peer review should play a more central role in a scheme which aims to embed a concept of lifelong learning and reflection?

Please select only one item

- Strongly agree Agree Neither agree or disagree Disagree
 Strongly disagree Don't know

Additional comments

19 To what extent do you agree or disagree with the principle that the GOC should have the same CET requirements for all fully qualified optometrists and dispensing opticians, by introducing peer review for dispensing opticians?

Please select only one item

- Strongly agree Agree Neither agree or disagree Disagree
 Strongly disagree Don't know

Additional comments

20 What impact and barriers, if any, would this policy have on dispensing opticians?

Comments

Section 3: Views on the proposed timeframe for introducing changes

In this section we would like to hear your views on the proposed timeframe for introducing changes to the CET scheme.

We are reaching the end of the current three year CET cycle which will finish on the 31 December 2018. We are then proposing a 12 month transition year from 1 January to 31 December 2019. We plan on launching our new CET scheme on 1 January 2020.

During the 2019 transition year, we will expect registrants to continue to demonstrate that they are keeping their skills and knowledge up to date via our CET scheme. We will continue to ensure that our focus is on public protection and ensuring that public trust and confidence in the profession is maintained.

During the transition year, registrants will be expected to achieve a minimum of 12 CET points, six of which should be interactive. This approach reflects a pro-rata split of the normal requirements for a three year cycle, i.e. 36 points over three years with half (18 points) achieved via interactive CET. Completion of CET competencies and peer review will not be mandatory during this time, but peer review is strongly encouraged.

We have brought forward the timeframe for delivery based on our need to develop our CET scheme in order to ensure it keeps pace with the changes that are happening and continues to protect the public.

We would like to work with stakeholders to ensure that this timeframe is realistic and achievable. We recognise that successful delivery of a new CET scheme requires collaboration and we welcome stakeholder views on our proposals.

21 What impact, if any, will there be as a result of proposals for a one year transition period where registrants will still be expected to complete CET as outlined above?

Comments

22 How could the GOC best support stakeholders during the transition year and into a new scheme starting in January 2020?

Comments

Final thoughts

23 Do you have any further comments you would like to add on any of the points raised in this consultation?

Additional comments

Publication

We need to know whether you would like us to be able to publish your response, either on this consultation hub or as part of the overall consultation report.

24 Can we publish your response?

(Required)

Please select only one item

Yes Yes, but please keep my name and my organisation's name private No

Feedback

25 On a scale of 1-5, where 1 is very easy and 5 is very difficult, please tell us how you found using this website to fill in the survey.

Please select only one item

1 2 3 4 5

Equality, diversity and inclusion

If you are responding as an organisation, please scroll to the bottom of the page and click 'continue'.

We welcome consultation responses from everyone, regardless of age, disability, gender reassignment, race, religion or belief, ethnicity, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity.

We don't want anybody to miss out or be disadvantaged because of the way we work and we try hard to make sure this doesn't happen. The following questions help us to understand who we are reaching with our surveys, so that we can make sure that everybody has the opportunity to get involved.

You do not have to answer these questions (just click 'Continue' at the bottom of this page if you don't want to), but we would be grateful if you did. Your answers to these questions will be treated as confidential and held securely in line with data protection requirements. They will not be considered or published alongside your name or anything else that might identify you.

For more information about how we use information like this across the General Optical Council, please visit the **Equality, Diversity and Inclusion** <https://www.optical.org/en/about_us/equality-and-diversity.cfm> section of our website.

26 Gender

Please select only one item

- Female Male Prefer not to say

27 Age

Please select only one item

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

28 Sexual orientation

Please select only one item

- Bisexual Heterosexual/straight Gay/Lesbian/Homosexual Other
 Prefer not to say

29 Disability

The Equality Act 2010 defines disability as a physical or mental impairment which has a substantial long-term effect on a person's ability to carry out normal day to day activities. Do you consider yourself to have a disability?

Please select only one item

- Yes No Prefer not to say

30 Gender identity

My gender identity is different from the gender I was assigned at birth.

Please select only one item

- Yes No Prefer not to say

31 Pregnancy/maternity

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

Please select only one item

- Yes No Prefer not to say

32 Ethnicity

Please select all that apply

- White - English/Welsh/Scottish/Northern Irish/British White - Irish
- White - Gypsy or Irish Traveller White - other (please specify)
- White and Asian White and Black Caribbean White and Black African
- Any other mixed/multiple ethnic background (please specify) Indian/Indian British
- Pakistani/Pakistani British Bangladeshi/Bangladeshi British
- Chinese/Chinese British Any other Asian background (please specify)
- African/African British Caribbean/Caribbean British
- Any other Black background (please specify) Arab/Arab British
- Any other ethnic group (please specify) Prefer not to say

If you have selected 'other', please specify

33 Marital status

Please select only one item

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

34 Carer responsibilities

Do you perform the role of a carer?

Please select only one item

- Yes No Prefer not to say

35 Religion/belief

Please select only one item

- No religion Buddhist Christian Hindu Jewish Muslim
- Sikh Any other religion/belief (please specify) Prefer not to say

If you have selected 'other', please specify