

# **GOC consultation report: CET Rules consultation**

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## Executive summary

We ran a public consultation seeking stakeholder views on changes we intend to make to our Continuing Education and Training (CET) Rules 2005 (amended in 2012). We are amending our CET Rules in order to underpin the changes that we will introduce at the start of the new three year Continuing Professional Development (CPD) cycle in January 2022.

We received 57 responses in total, with 19 from organisations and 38 from individuals.

## Summary of key findings

- The majority of respondents, 59%, agreed that the amended CET Rules reflected the changes we are seeking to make to the scheme in January 2022.
- The majority of respondents, 62%, thought that the amendments made to the CET Rules were clear.
- Around two thirds of respondents, 65%, thought that there was nothing missing from the amended CET Rules.
- In relation to the specific amendments made to the CET Rules, generally respondents commented on the policy proposals relating to the scheme rather than on the drafting of the Rules themselves. The main comments were:
  - Greater clarity was needed on what the CET provider fee, currently set at £45 a year, would be. There were many concerns that the GOC would raise the fee.
  - Greater clarity was needed on the ability of registrants to obtain up to 50% of their CPD points from non-approved GOC providers in future.
  - Greater clarity was needed about what the GOC expected from registrants in relation to the new requirement to undertake a reflective activity.
- In relation to aligning CPD requirements for dispensing opticians and optometrists, our proposal to introduce a new requirement in the CET Rules for dispensing opticians to undertake one peer review activity per three year cycle was strongly supported by organisational stakeholders. This included the Association of British Dispensing Opticians (ABDO), the Association for Independent Optometrists and Dispensing Opticians (AIO), the College of Optometrists and the Directorate of Optometric Continuing Education and Training (DOCET), the Association of Optometrists and FODO – the Association for Eye Care Providers.
- There were, however, some concerns from individual respondents, particularly dispensing opticians in relation to introducing this, for example:
  - The additional requirement would be unfair as dispensing opticians do not receive any funding to undertake CET unlike optometrists.

- Dispensing opticians receive lower salaries and are already under pressure at work, so would not favour additional CET requirements.
- In relation to our plans to remove reference to the £45 CET provider fee in our CET Rules, and instead allow the GOC Council to set the fee at their discretion, there were many concerns about this, highlighted not only in this section but throughout the consultation:
  - There were concerns about a lack of transparency and clarity on how the fee would be set in future. More information was needed from the GOC and suggestions included tailoring the fee to, for example, the size of the CET provider, the amount of CET a provider delivers, linked only to inflation, and capped at a certain amount.
  - There were concerns that the GOC would increase the fee in future which could impact on CET providers and the provision of CET. Additionally, any fee increase could be passed onto registrants indirectly.
  - Any fee increase could significantly impact on smaller CET providers and potentially create barriers to individuals seeking to become a listed provider.

### Next steps

We would like to thank all those who responded to the consultation and we have taken on board all the feedback received. The next steps will be for us finalise the amended CET Rules then present this consultation report and the amended Rules to the Department of Health and Social Care (DHSC). In order to amend our CET Rules we will need legislative change including approval from the Secretary of State for Health and Social Care and the Privy Council.

## Background to the consultation

We have consulted extensively with stakeholders over changes we intend to make to our current CET scheme. Our aim is to make the scheme more flexible and less prescriptive, allowing registrants greater freedom to undertake learning and development which is relevant to their own personal scope of practice.

We ran a public [consultation in 2018](#) and more recently another [consultation](#) from 28 May to 20 August 2020. On 14 November 2020 we sought approval from the GOC's governing Council to progress with the following changes:

- Replacing the competencies which currently underpin the scheme, to the [Standards of Practice for Optometrists and Dispensing Opticians](#).
- Allowing registrants more control over their learning and development and the ability to tailor it to their own personal scope of practice.
- Enhancing requirements for registrants to reflect on their practice.
- Changing the name of the scheme from CET to Continuing Professional Development (CPD). In line with this, from here on in this consultation, we will refer to any future scheme and activities within it as 'CPD', and the current CET arrangements as 'the current scheme'.
- Introducing a new proportionate system of CPD approvals.
- Consult on a new requirement in our Rules to introduce peer review for dispensing opticians. This would be the same requirement that we currently have for optometrists and contact lens opticians, who are required to do one peer review activity in every three year cycle.
- Remove reference in the Rules specifying a set fee of £45 payable by CET providers annually to the GOC, instead allowing Council to set the fee at their discretion.

This consultation gave stakeholders an opportunity to review the amended CET Rules to ensure that they did not have any unintended consequences or impact.

## Methodology and respondents

We ran a six week public consultation, from 17 December 2020 to 28 January 2021. We received 57 responses in total from the respondents outlined below, including 19 from organisations and 38 from individuals.

Category	Total
Optometrist	18
Dispensing optician	18
Director of an optical business	2
Optical business	3
CET provider	8
Professional body	4
Optical defence/representative body	2
Commissioner of optical care	1

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

- Insight Optical Training
- Orbita Black Limited
- The College of Optometrists and the Directorate of Optometric Continuing Education and Training (DOCET)
- Association for Independent Optometrists and Dispensing Opticians (AIO)
- Association of British Dispensing Opticians (ABDO)
- Association of Optometrists (AOP)
- FODO – the Association for Eye Care Providers

We have only used quotes from individuals or organisations who consented to have their response published. Quotes are verbatim so we have not changed the spelling, grammar or format.

#### *Interpretation of the survey data*

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

- the question may have allowed each respondent to give more than one answer;
- only the most common responses may be shown in the table or chart;
- individual percentages are rounded to the nearest whole number so the total may come to 99% or 101%; and
- a response of between 0% and 1% will be shown as 0%.

## Analysis of consultation findings

### Section 1: Amendments to the GOC's CET Rules

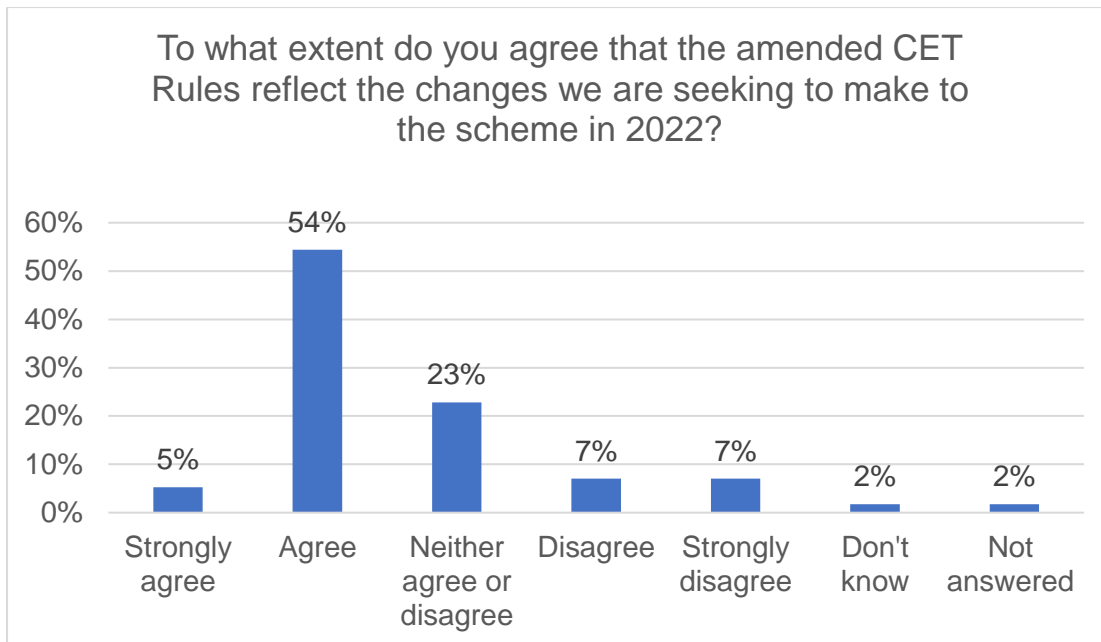
In this section we asked respondents for views on amendments we had made to our CET Rules to reflect the changes we are planning to introduce in January 2022.

In summary the amended Rules reflect the following changes:

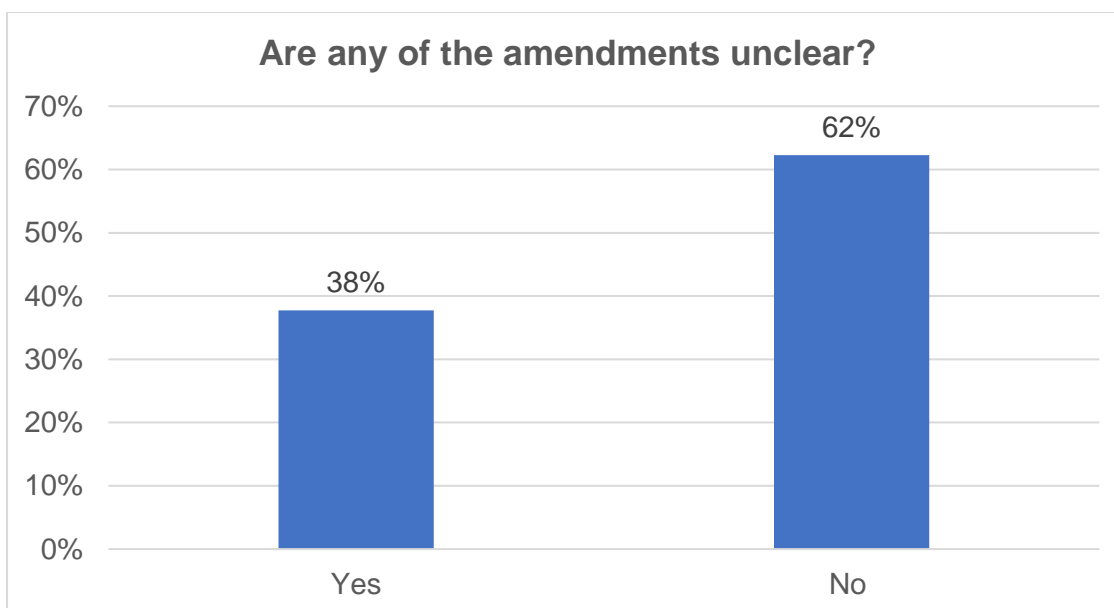
- Changing the name of the scheme to Continuing Professional Development (CPD).
- Using the Standards of Practice for Optometrists and Dispensing Opticians to underpin the CPD scheme, grouped into four domains: (1) Professionalism; (2) Communication; (3) Clinical practice; (4) Leadership and accountability.
- Establishing a new requirement for all registrants to carry out a reflective activity on their CPD plan, either part-way through or at the end of the cycle.
- Greater flexibility for registrants to document and plan reflection, and the ability to use another organisation's reflective piece/template to 'count' towards reflective CPD requirements.
- Aligning peer review requirements for optometrists and dispensing opticians, by introducing a new requirement for dispensing opticians to complete one peer review activity per three year cycle.
- Allowing registrants to obtain up to 50% of their CPD points from other sources than GOC approved providers.
- Introducing a more proportionate system of CPD approvals by removing the current requirement for the GOC to approve each CPD activity before registrants complete it.
- Removing reference in the CET Rules specifying a set fee of £45 payable by CET providers annually to the GOC, instead allowing Council to set the fee at their discretion.

The first question we asked stakeholders was, to what extent they agreed that the amended CET Rules reflect the changes we are seeking to make to the scheme in January 2022. We received 56 responses. Overall, the majority of respondents (59%) agreed; 14% disagreed; 23% neither agreed or disagreed; and 2% did not know.

The respondents who agreed strongly or agreed included FODO, the College of Optometrists and The Directorate of Optometric Continuing Education and Training (DOCET), AIO, ABDO and the AOP.



We then asked respondents if the amendments made to the CET Rules were clear. There were 53 responses to this question, with 38% stating that the amendments were unclear and 62% stating the amendments were clear.



Respondents were then asked to provide any additional comments in relation to whether the amendments made to the CET Rules were clear. There were no specific points in relation to the drafting of the Rules. Instead there were more general comments and main themes that emerged were:

- Greater clarity was needed on what the CET provider fee, currently set at £45 a year, would be. There concerns that the GOC would raise the fee.
- Greater clarity was needed on the ability of registrants to obtain up to 50% of their CPD points from non-approved GOC providers in future.



- Greater clarity was needed about what the GOC expected from registrants in relation to the new requirement to undertake a reflective activity.

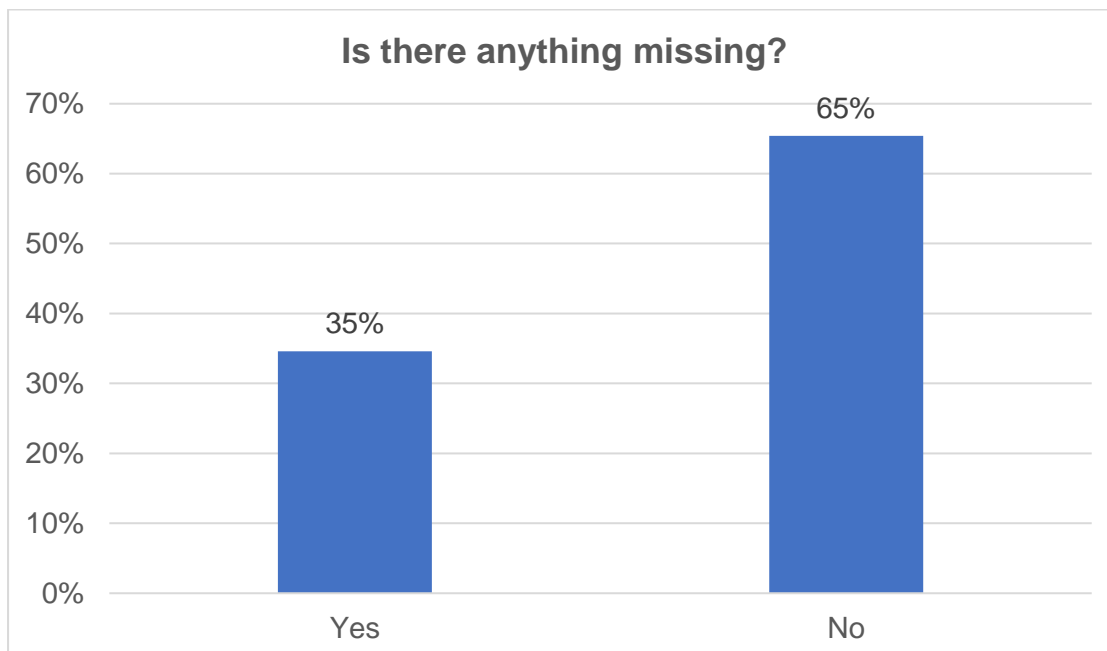
*“The last amendment, does this mean you would now be able to charge a higher fee to CET providers? If so, would that in turn reduce the number of free CET events and therefore reduce the number of delegates at an event.” (Optometrist)*

*“The reflective activity will need to explained fully to registrants at the start of the cycle.” (CET provider)*

In relation to the organisational stakeholders who responded that the amended rules were unclear:

- The AOP said that although they had no significant issues with the amended rules, the GOC had not clearly shown what changes had been made, so it was difficult to assess whether all the necessary changes had been incorporated into the Rules to underpin the scheme in 2022.
- The AIO also thought that the rules were unclear because the GOC had not outlined what steps it was going to take to ensure that the 50% unapproved CET would be suitable.

We then asked respondents if there was anything missing in relation the amended CET Rules. There were 52 responses to this question, with 35% of respondents stating yes, and 65% of respondents stating no.



Similarly to the previous question, the comments were mainly general comments about the changes the GOC intended to make to the CET scheme.

- Dispensing opticians should receive the same funding for undertaking CET as optometrists.
- Greater clarity was needed on what the CET provider fee, currently set at £45 a year, would be. There concerns that the GOC would raise the fee. More detail is needed on how the GOC might set the fee in future.
- Greater clarity on what reflective activity the GOC wanted registrants to carry out in the new scheme.

*“That Contact Lens Opticians and Dispensing Opticians should have equal entitlement to a contribution towards the costs of CPD as currently received by Optometrists.” (Contact lens optician)*

*“The requirement for self-reflection is positive. However, opportunities for reflection with a peer must be provided, and the GOC must ensure that appropriate time is provided by employers so that their employees are able to fulfil this requirement during their working hours. As an employed sole practitioner, no time during my working day was allocated for CET, and the majority of CET that I undertook was performed at my own personal cost, having only ever received the CET allowance claim once in my career, during my own 'free' time; the financial and personal cost to individuals may be greater if time is not provided by employers to perform self-reflection. From my experience, it may also be difficult for individuals to arrange a discussion with a peer because there may be very little localised professional support or interaction with peers; therefore, the ability to converse with a peer must be provided (e.g., a group of professionals who are willing to provide one-on-one peer discussion to anyone that requires it).” (Optometrist)*

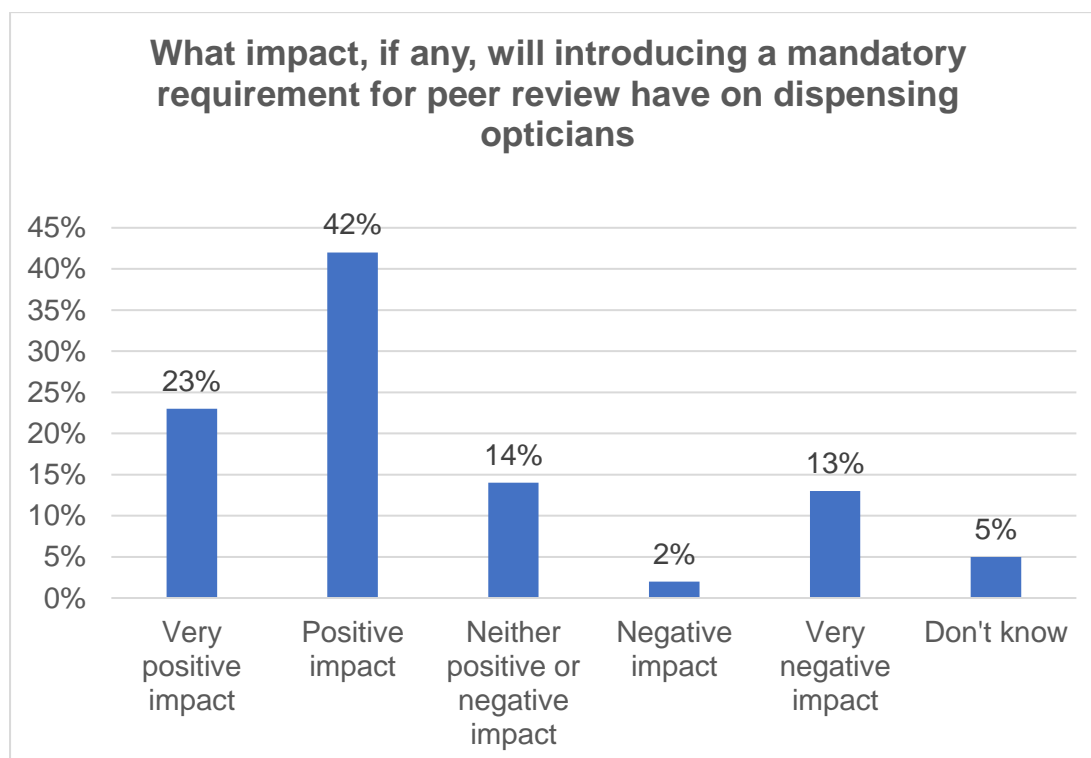
## Section 2: Aligning CPD requirements for optometrists and dispensing opticians: introducing peer review for dispensing opticians

In this section we asked respondents about our plan to align future CPD requirements for optometrists and dispensing opticians, by introducing a requirement in the amended CET Rules for dispensing opticians to undertake one peer review activity every three year cycle.

We asked respondents to what extent they agreed with introducing peer review for dispensing opticians. We received 56 responses to this question. Overall, 65% agreed with this proposal; 19% disagreed; 13% neither agreed or disagree; and 2% did not know.

The organisational stakeholders that agreed with this proposal included the AIO, ABDO, the College of Optometrists and The Directorate of Optometric Continuing Education and Training (DOCET), the AOP, and FODO.

The next question we asked respondents was, what impact, if any, will introducing a mandatory requirement for peer review for dispensing opticians have. We received 56 number of responses. Overall, 65% said it would have a positive impact; 15% said it would have a negative impact; 14% said neither a positive or negative impact; and 5% did not know.



Finally, we asked respondents for any additional comments in relation to our proposal to introduce a requirement for dispensing opticians to undertake a peer activity, and any comments about potential improvements or barriers this change could create.

- The main concern related to funding. Many individual respondents thought that creating extra requirements would be unfair for dispensing opticians as

they felt that dispensing opticians were disadvantaged in many ways compared to optometrists, for example:

- dispensing opticians do not receive any funding for CET<sup>1</sup>;
- they receive lower salaries; and
- are not given the same time to undertake CPD by their employer.
- Dispensing opticians are already under pressure at work from the amount of work they must do and would not necessarily have the time to complete extra requirements.
- Many dispensing opticians already carry out similar peer to peer exercises, for example, group discussions or workshops which achieves the same benefit as a peer review.
- A couple of individual respondents questioned the need for dispensing opticians to do peer review at all.

*“Perhaps you will ensure that seeing as DOs pay the same fees and now will have to undertake more CET that they also receive a CET grant the same as OOs, given that OOs get a greater salary and more free time in clinics in which to complete CET.”* (Dispensing optician)

*“Along with the proposed ‘reflective activity’, I fear the peer review element will add more to an already heavy workload. I personally find it tough enough to earn sufficient interactive points in a cycle without the added fear of not being able to fulfil a peer review criteria also.”* (Dispensing optician)

On the other hand, the organisational stakeholders welcomed the proposal, with ABDO strongly agreeing with introducing peer review for dispensing opticians and thought it would have a positive impact. Other organisational stakeholders that agreed included the College of Optometrists and The Directorate of Optometric Continuing Education and Training (DOCET), the AIO, the AOP and FODO.

*“This is a very welcome change that will allow all registrants to be seen and practice as equals with regards their status as a healthcare professional.”* (ABDO)

*“AIO supports this suggestion since it places dispensing opticians on an equal footing to optometrists in being regarded as clinical professionals. AIO hopes that this move increases the remit of dispensing opticians and builds on inter-professional work.”* (AIO)

*“We welcome the introduction of peer-review for dispensing opticians. Many DOs already choose to benefit from the learning experience provided by peer review. Making this a requirement would help provide this valuable learning experience for*

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<sup>1</sup> Health Education England annually provides CET funding for optometrists in England through the Directorate of Optometric Continuing Education and Training (DOCET), a special Committee administered by the College of Optometrists. The DOCET was set up by the Department of Health in 1989 to oversee the management of government funds set aside for the provision of optometric CET for all UK registered optometrists.

*all DOs. We supported aligning this requirement in our response to the GOC Lifelong Learning Review consultation.” (AOP)*

*“As is acknowledged, the dispensing profession has strongly embraced peer review. This change will validate that professional commitment at the same as supporting participation from the small number who may still are still nervous of this kind of education, to the public benefit.” (FODO)*

### Section 3: CPD fees

In this section, we asked for stakeholder views on our plans to remove reference to the £45 CET provider fee in our CET Rules, and instead allow the GOC Council to set the fee at their discretion.

There were 37 respondents who provided views on this proposal. In relation to the CET providers, we received two responses from Local Optical Committees (LOC) who currently provide CET to GOC registrants. They were both concerned about the removal of the £45 fee as any increase may result in them withdrawing as a provider in future as they may not be able to afford a fee increase. One of the respondents thought that the fee should be capped at £45 for LOC providers.

Other CET providers said that any a fee increase may deter smaller specialist providers of CET and could be passed on indirectly to GOC registrants i.e. a registrant would be charged a higher price to attend to CET event to subsidise any increase in the provider fee.

The AOP, a large provider of CET, understood the reasoning for removing a set fee in legislation and any fee increase likely to be minimal in impact for them. However, the AOP also noted that smaller CET providers could be affected by an increase and this could then impact on the provision of CET for GOC registrants.

In summary, CET providers thought that a fee increase could have the following impacts.

- Would likely have little/no impact on large CET providers as they could bare a cost increase.
- Would potentially have an impact on smaller CET providers (for example, Local Optical Committees (LOCs), and individual CET providers), as some could not afford to pay a higher fee. This could stop or deter them from becoming a CET provider in future, which could then have knock on effects for the provision of CET for GOC registrants.
- Would potentially have an impact on GOC registrants if in future CET providers charged a higher free to attend a CET event in future i.e. registrants subsidising the fee increase for providers.

CET providers would like greater clarity and transparency from the GOC on how it would set the fee structure in future.

*“It would be helpful for the GOC to make clear the basis on which it plans to calculate CPD provider fees as this was not clear from the original consultation. As this is a service which benefits the public and is a key part of quality underpinning for the future, it should be designed to be streamlined and efficient as well as ‘lighter touch’ as proposed. Fees should be set to reflect this, to encourage a wide range of innovative providers to offer CPD and should not be used as to generate income.” (FODO)*

*“There is a concern that the set fee is going to be scrapped in favour of a fee set by the Council at its discretion. LOCs are funded by levy contribution based on*

*NHS GOS sight tests completed, from its members and if the LOC is a CET provider then the fee should be capped for LOCs at £45.00 otherwise there is the risk that a CET cannot afford to be a provider of CET.” (CET provider)*

*“The proposed removal of reference to the provider set fee leaves providers with uncertainty about the potential charges for this. It would be helpful to have a clear indication of the price range of fees that the GOC is considering.” (College of Optometrists and The Directorate of Optometric Continuing Education and Training (DOCET))*

*“Without giving an indication of the fee the GOC may intend to set, it is impossible to comment if this is positive or negative. Transparent information on how the current fee is used and whether this is inadequate or not should be provided, alongside considerations of the new intended system and the anticipated costs where changes are to be implemented. Such as, changing costs by removing upfront approval and potential costs of auditing systems to be implemented. Will the GOC intend to raise the cost of provision on an annual basis? Could there be a risk of provision being financially unviable for some providers. Will extra costs for providers be passed onto registrants and will this in turn potentially reduce access to CPD for GOC registrants?” (ABDO)*

In relation to other respondents, similar themes emerged:

- Clarity and transparency is required on how the GOC would set the fee in future.
- Some respondents thought it was difficult to comment on the impact this proposal would have as the GOC had not provided any detail on what the fee might be in future.
- A fee structure would be helpful, for example, it could be tailored to the size of the CET provider, how much CET a provider delivers, tied to inflationary increases, and capped at a certain amount.
- There were concerns that the GOC would increase the current £45 fee which could impact on smaller CET providers who might choose not to provide CET in future and the provision of CET for GOC registrants.

*“So long as the fee is not prohibitive to people applying to become a listed provider - I am thinking of remote practitioners, single parents, caring within a family setting etc who may seek to become providers in an effort to help colleagues & keep CPD local & accessible when more national or Professional Body provided CPD is difficult to attend.” (Individual respondent)*

*“Can the council give some transparency on the administrative detail involved with this rule and explain why removing the set fee will alleviate it?”*

*I am an independent registered CET provider, I write and deliver a very low number of events per year in addition to my main employment. This work enriches my own learning as I research and create new material and will in future count towards my own CPD...*

*Considering the breadth of scale within of providers of CET a flat cost of £45 would seem disproportionate considering the impact that each provider generates in terms of accreditation, approval and processing.*

*Any change to the fee structure for provider should reflect the size, scale and impact of any provider on the CET System to ensure it is proportionate.*

*The concern for a small provider like myself is that fees could rise or be set at a prohibitive level if the intention is to increase the fee.*

*I welcome the move to a proportionate fee structure in principle as long as it is not prohibitive for small providers” (Individual respondent)*



## Conclusions

- In relation to the amended CET Rules:
  - The majority of respondents, 59%, agreed that the amended CET Rules reflected the changes we are seeking to make to the scheme in January 2022.
  - The majority of respondents, 62%, thought that the amendments made to the CET Rules were clear.
  - Around two thirds of respondents, 65%, thought that there was nothing missing from the amended CET Rules.
- In relation to aligning CPD requirements for dispensing opticians and optometrists, our proposal to introduce a new requirement in the CET Rules for dispensing opticians to undertake one peer review activity per three year cycle was strongly supported by organisational stakeholders, including ABDO.
- There were, however, some concerns from individual respondents, particularly dispensing opticians in relation to introducing this, for example:
  - The additional requirement would be unfair as dispensing opticians do not receive any funding to undertake CET unlike optometrists.
  - Dispensing opticians receive lower salaries and are already under pressure at work, so would not favour additional CET requirements.
- In relation to our proposal to remove the £45 fee for CET providers from the CET Rules, the following comments were made.
  - There were concerns about a lack of transparency and clarity on how the fee would be set in future. More information was needed from the GOC and suggestions included tailoring the fee to, for example, the size of the CET provider, the amount of CET a provider delivers, linked only to inflation, and capped at a certain amount.
  - There were concerns that the GOC would increase the fee in future which could impact on CET providers and the provision of CET. Additionally, any fee increase could be passed onto registrants indirectly.
  - Any fee increase could significantly impact on smaller CET providers and potentially create barriers to individuals seeking to become a listed provider.
- In relation to other comments, the main ones were that:
  - greater clarity was needed on the ability of registrants to obtain up to 50% of their CPD points from non-approved GOC providers in future; and

- greater clarity was needed about what the GOC expected from registrants in relation to the new requirement to undertake a reflective activity.