

Discussion paper on our approach to setting registrant fees

April 2026

About the General Optical Council

The General Optical Council regulates eye care services in the UK. We currently register around 35,000 optometrists, dispensing opticians, student optometrists, student dispensing opticians and optical businesses. The groups on our register are called registrants.

We have four core functions:

- setting standards for optical education and training, performance, and conduct;
- approving qualifications leading to registration;
- maintaining a register of individuals who are fit to practise or train as optometrists or dispensing opticians, and bodies corporate who are fit to carry on business as optometrists or dispensing opticians; and
- investigating and acting where registrants' fitness to practise, train or carry on business may be impaired.

For more information, please visit our website: <https://www.optical.org/>

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Overview

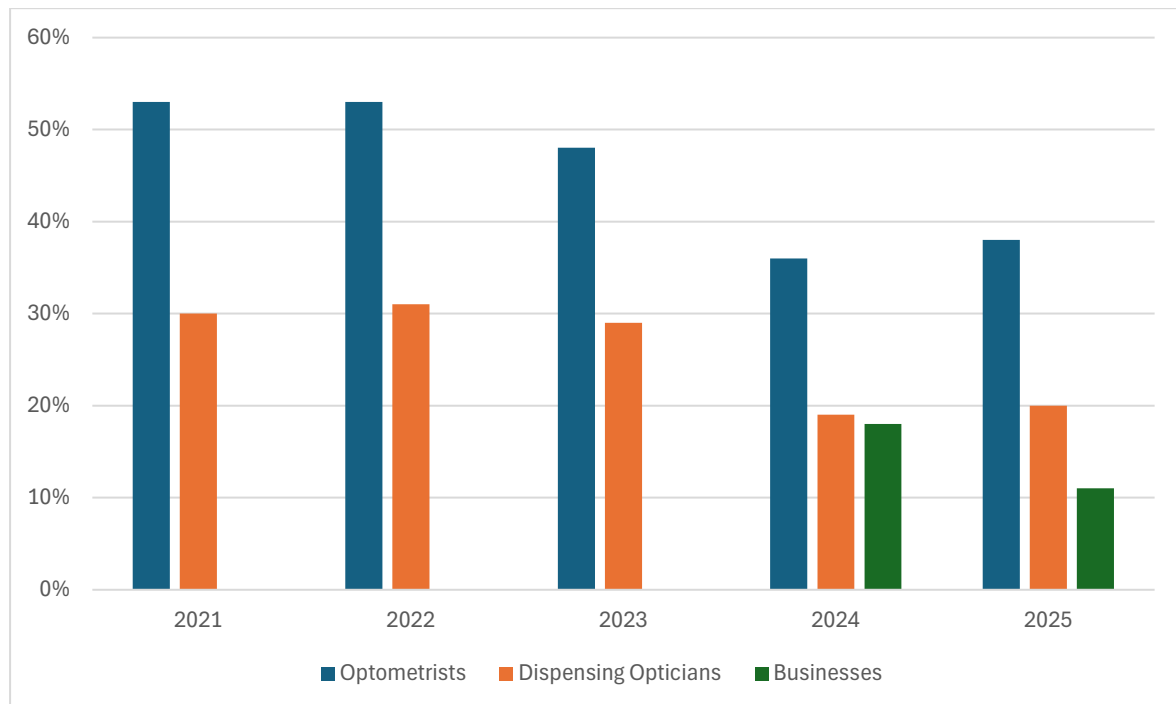
What we're doing

1. The purpose of this discussion paper is to begin a conversation with registrants about options for changing the way we set the annual registration renewal fee. It seeks views on whether the fees different groups of registrants pay should vary depending on the costs of regulating them and other factors. Further, we explore options that could support registrants to better manage the costs of regulation, including payment by instalments and the GOC setting fees two or more years in advance, rather than each year as now.
2. The paper is not seeking views on the level of registration fee, which is set by Council each year in line with our financial strategy 2025-30 to increase fees broadly in line with inflation. In the current economic climate, we are mindful of the impacts of the cost of regulation, including the annual registration renewal fee and compliance costs. We are pursuing a range of measures aimed at improving our efficiency and ensuring value for money, as well as reviewing our regulatory requirements to ensure these are proportionate.
3. Instead, the starting point for this paper is that given we will always need a minimum level of income to discharge our regulatory functions whether we should change how this income is distributed among different registrant groups or keep the current system where most registrants pay the same fee.
4. The options fall into five groups:
 - Key principles underpinning our approach to setting fees
 - Differential fees – options include
 - Lower fees for dispensing opticians
 - Higher fees for registrants with specialist qualifications
 - Lower fees for newly qualified registrants
 - A more generous low-income discount scheme
 - Lower fees for registrants on maternity or similar leave
 - Enhancing payment flexibility – payment by instalments
 - Business registrant fees – options include
 - Rebalancing income between individual and business registrants
 - Moving from a flat fee to differential fees based on business size
 - Payment by instalments
 - Providing clarity for registrants – options include
 - Consulting on costed plans and fees
 - Single or multi-year fees
5. We are not making specific proposals at this stage. Instead, we wish to understand if there is appetite for change and a preferred direction of travel.

Why we're doing this now

6. Our 2025-30 corporate strategy includes a commitment to “review our approach to setting registrant fees, enhancing fairness, and delivering value for money, ensuring that the fees we set are sufficient to meet our operational costs and to maintain our reserves within agreed limits”.
7. The discussion paper takes place against the backdrop of difficult economic conditions, which are creating financial pressures for the individuals and businesses we regulate. This is reflected in growing dissatisfaction with the renewal fee. As shown in Chart 1, only 38% of optometrists, 20% of dispensing opticians and 11% of businesses consider the fees we set to be reasonable. In the data, respondents who do not consider our fees reasonable are more likely to plan to leave the profession within the next two years. Clearly, we wish to avoid a situation where renewal fees contribute to the profession shrinking.
8. Given our strategic objective of creating fairer and more inclusive eye care services, we wish to explore if there is a fairer model for setting registrant fees and mechanisms to support registrants manage the costs of regulation. This includes considering how different approaches to setting fees may affect different groups of registrants, and whether there are any unintended impacts, for example on entry to the register or workforce retention.

Chart 1 – Declining registrant satisfaction with fees



The chart includes data from the registrant surveys 2021-25 and the business registrant surveys in 2024 and 2025. Bar columns total strongly agree and agree responses to the question: Please indicate to what extent you agree or disagree that the GOC registration fees are reasonable.

9. Our aim is that this discussion paper will improve engagement with registrants about fees. We recognise the need to improve transparency around fees as a way of improving engagement. Section 1 of this discussion paper explains how the fee system works and describes how fee income funds our work including a council tax style pie chart showing expenditure across our activities. We think that deciding fees based on agreed principles will also improve transparency.
10. We appreciate the costs of regulation include complying with our requirements, including time as well as expenditure, in areas like professional indemnity insurance and continuing professional development (CPD). Indeed, for many registrants, these costs will be higher than the annual renewal fee. During the lifetime of the 2025-30 strategy, we plan to review our regulatory arrangements to ensure our requirements are risk-based and proportionate, beginning with a review of our CPD system. However, our surveys indicate that many of the compliance costs which business registrants do not consider to be reasonable do not flow from GOC regulation, but instead from general legal obligations (e.g. data protection, safeguarding) and NHS contractual requirements.
11. Finally, we are realistic that paying for regulation is never going to be popular. However, by improving engagement with registrants on fees, including through this discussion paper, we hope to foster an understanding of the financial and other benefits that regulation delivers for registrants, as well as for society. Achieving our mission – to protect the public by upholding high standards in eye care services – gives citizens the confidence to purchase the goods and services that registrants provide, makes optical careers more attractive, promotes fair competition, creates an environment that facilitates investment, and supports governments and commissioners of services across all four nations to shift more eye care into communities.

What will happen next?

12. The discussion paper will be open for comments for 12 weeks until 20 July 2026. You can respond either using our online consultation platform or by emailing consultations@optical.org.
13. Once the consultation has closed, we will analyse all the comments we have received and identify whether we need to make changes to our fees system. We will publish a summary of feedback received and outline next steps.

Section 1: Current system for setting registrant fees

14. As background information, in this section we set out how our current system for setting registrant fees works and the income generated from the different fees we charge. We also explain where our income from registrant fees is spent across our different activities in support of delivering our statutory functions.

Sources of income

15. The annual registration renewal fee represents nearly all the GOC's income – 96% in 2024/25. Our only other sources of income are from investments and CPD provider fees. We do not receive any taxpayer funding.
16. We charge a series of other fees including for applications for initial registration to our registers, restoration to our registers and transfers between registers. There are various fees for assessing applications from individuals outside of the UK seeking to gain entry to our register. Finally, we may set ancillary fees for specific activities such as letters of good standing.
17. The current fee schedule is published on the [website](#). Fully qualified and business registrants are notified annually in December of the new fee and are required to complete their retention by the initial deadline of 15 March. This includes submitting the retention form and making payment through their MyGOC account. The final deadline for completion is 31 March. Students are required to submit their retention form and make payment by the initial deadline of 15 July, with a final deadline of 31 August. Failure to meet these deadlines will result in removal from the register.
18. Like other organisations, we maintain appropriate reserves, which we use to fund strategic projects like upgrading the MyGOC registration platform. We should not use reserves to fund our business-as-usual activity, so it is important that our fees income covers the anticipated costs of our day-to-day work.

Different categories of registrants and the fees we charge

19. The GOC is unique among the ten healthcare regulators in regulating three distinct categories of registrant: students, fully qualified professionals and businesses. Some fully qualified professionals have post-registration specialty qualifications, namely independent prescribing and contact lens opticians.
20. The government plans to modernise the legislation of all healthcare regulators but it is not known when the GOC's legislation will be updated. When this happens, we expect to regulate all optical businesses carrying out restricted activities under the Opticians Act and to no longer regulate students. However,

given legislative change is unlikely in the short term, we are treating this as a background factor in determining our approach to setting registrant fees.

21. Fully qualified professionals and business registrants pay the same annual registration renewal fee, which was £415 in 2025/26. Contact lens opticians and independent prescribers do not pay an additional fee. Students pay a reduced annual registration renewal fee, which was £30 in 2025/26.
22. Low-income earners (earning below £16k) pay a discounted fee, which was £285 in 2025/26. Applicants may be asked to provide proof of income.
23. The table below provides an overview of numbers of registrants in each category and the amount and proportion of income we received for the 2024/25 financial year, which is our last fully audited accounts. In this year, the main registration annual renewal fee was £405.

Table 1 – Overview of annual registrant renewal fee income (2024/25)

Registrant type	Fee	Number	%	Income (£k)	%
Student optometrist	£30	4,846	14.7%	145	1.3%
Student dispensing optician	£30	1,137	3.4%	34	0.3%
Student Total		5,983	18.1%	179	1.6%
Fully qualified optometrist	£405	16,780	50.7%	6,796	61.6%
Fully qualified dispensing optician	£405	6,525	19.7%	2,643	23.9%
Low-income scheme	£285	935	2.8%	266	2.4%
Fully qualified Total		24,240	73.2%	9,705	87.9%
Body corporates		2,852	8.6%	1,155	10.5%
Total renewals 2024/25		33,075	100%	11,040	100%
Other registration income				632	
Total Registration Income 2024/25				11,672	

How we set registrant fees

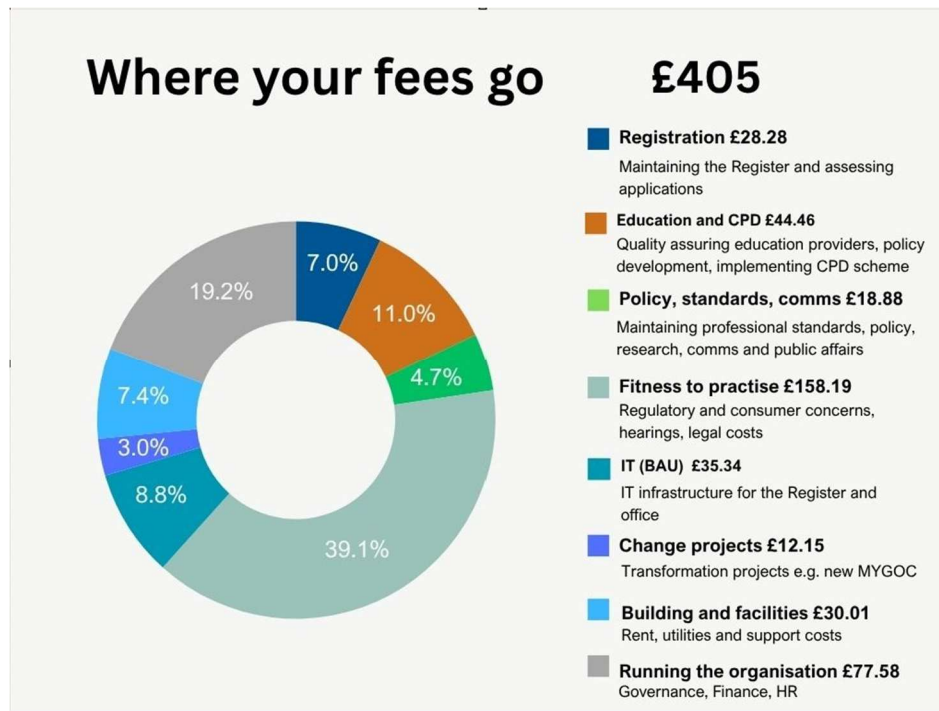
24. Registrant fees are agreed by Council each December ahead of the next registration renewal cycle. Anyone can observe these meetings and the papers setting out the proposed fees and the rationale are published for all to see.
25. We operate based on a five-year corporate strategy and annual business plans. The 2025-30 corporate strategy is supplemented by a financial strategy for the same period. This describes that our income will continue to be derived primarily from the fees we charge registrants to enter or remain on the register, and we will not seek to develop new sources of income. We expect overall income levels to increase modestly, in line with inflation and register growth.

26. In simple terms, within each annual business planning cycle beginning in September, the executive estimates the cost of its planned activities for the next year. These plans are scrutinised by the Audit and Risk Committee (ARC) – a committee of Council. These budgets together with consideration of assumptions and risks inform the registration fees set by Council in December. This decision enables the executive to finalise proposed business plans and budgets across departments, which are reviewed by ARC in February. Council is asked to approve the final business plan and budget each March.

Where we spend our income

27. Our objective in setting fees is to enable us to fund the costs of our operations and delivery of our statutory functions from revenue received. Broadly, our statutory functions include overseeing the education and training system, maintaining the registers, setting professional standards and our fitness to practise activities. We also fund the Optical Consumer Complaints Service – a mediation scheme for consumer disputes. Fee income also covers the costs of salaries and fees for our staff, workers and members, office accommodation, and all the activities and services that enable us to carry out our work. We must also pay an annual fee (currently about £100k) to our oversight regulator, the Professional Standards Authority (PSA).
28. We also recognise the need to demonstrate effective value for money. As part of our 2025-30 strategy, we developed a performance reporting framework to help us measure the success of the strategy. Our approach includes:
- Continuing to report on key performance indicators on our operational performance and progress on delivery of business plan activities through public Council papers and in our annual report and accounts
 - Returns to the PSA to support its assessment of our performance
 - Embedding a benefits realisation approach in our project work
 - A basket of indicators approach to measuring high-level outcomes evidenced through our surveys, internal data and reliable sources of external data.
29. To improve transparency, we have produced a pie chart, which we intend to update annually, showing how this income is spent across our key activities.

Chart 2 – Expenditure across our key activities (2024/25)



Section 2: Options for change

31. In this section, we outline options for changing our approach to setting registrant fees. At this stage we are not making specific proposals but wish to understand if there is appetite for change and a preferred direction of travel.
32. The options fall into five groups:
 - Key principles underpinning our approach to setting fees
 - Differential fees
 - Enhancing payment flexibility
 - Business registrant fees
 - Providing clarity for registrants

Key principles underpinning our approach to setting fees

33. We consider that a published set of key principles underpinning our approach to setting fees will improve transparency and registrant engagement with fees. Our analysis of options for change below is informed by these principles.
34. Taken together, these principles are intended to balance fairness, affordability and transparency for registrants while ensuring financial sustainability for the GOC, recognising that these considerations may not always align.
35. It is likely that the principles will conflict for some policy options. Where this happens, the challenge is to strike the best balance between them consistent with our organisational values and strategic objectives.
36. We welcome views on the ten draft principles below, which are informed by fee policies used by other professional services regulators.
 - Reflective of the costs of regulating different registrant groups
 - Fair to registrants and informed by their ability to pay
 - Consider external factors including economic conditions and benchmarking with other healthcare regulators
 - Efficient and economical to administer
 - Deliver predictable income to meet the cost of regulation
 - Be stable - fees should not vary considerably year on year
 - Simple for registrants and others to understand
 - Based on data that can be verified
 - Transparent and demonstrate value for money
 - Consistent with the GOC's Financial Strategy

Q1. Please comment on the ten principles

Differential fees

37. As explained in Section 1, the GOC sets the same annual registration renewal fee for all fully qualified registrants and businesses. Students pay a significantly lower fee and there is a discount for low-income earners. However, we are aware that some regulators set different fees for different categories of registrant and/or make greater use of discounted rates than we do.
38. There are advantages to maintaining our current flat fee model, which is simple to understand for registrants and resource efficient for us to administer. However, considering our draft fee setting principles and registrant feedback on our fees, we wish to explore views on setting differential fees.
39. Differential fees are an issue where the ten draft key principles are in tension. Positively, it could make the fees model fairer by reflecting the costs of regulating different groups of registrants, as well as factoring the greater financial pressures some registrants face. However, it would be more complex for us to administer and in some cases require the introduction of means testing, compliance and enforcement mechanisms. We would need to pass the additional costs of administration on to registrants through higher fees.
40. The first of our ten principles is that the fees we set should be reflective of the costs of regulating different groups. Some of our activities, such as maintaining the register, requires the same amount of work, and thus cost, for each type of registrant. However, the costs we incur in activities like fitness to practise, which due to the nature of the work is also higher cost to operate, are skewed towards optometrists since most cases involve this registrant group. As seen in Chart 1, fitness to practise work accounts for around 39% of our total costs. Even so, while it may normally be fairest to allocate the costs of regulation where they fall, an element of cross-subsidy between different groups may be justifiable on fairness grounds. The GOC has already established this practice through the low-income fee scheme. Understanding the views of registrants will help us to strike the right balance between these competing factors.
41. It is important to remember that setting differential fees would not change the total annual income that we would need to collect from registrants. Therefore, if our fee income from one group of registrants reduced, fee income from other registrant groups would need to increase. Below we have modelled the impact of various types of differential fee considering how many registrants would

benefit and by how much and calculated what change to the standard fee would be needed to compensate for the difference.

Option 1 – Lower fees for dispensing opticians

42. We could consider setting lower fees for dispensing opticians since the costs of regulating them are lower than for optometrists. In each of the last five years dispensing opticians have been underrepresented in fitness to practise investigations as a proportion of total registrant numbers.¹ We note that the General Pharmaceutical Council charges lower fees to pharmacy technicians than pharmacists due to the smaller number of the former going through its fitness to practise processes. More generally, the less clinical nature of dispensing opticians' work means they have a lower risk profile compared to optometrists. We also note significantly lower satisfaction with fees among dispensing opticians (20%) compared to optometrists (38%) in our registrant survey. In terms of ability to pay, there are considerable differences in salaries between the two groups based on information on jobs boards and surveys². Finally, our analysis of registration data shows that dispensing opticians experience substantially higher early- and mid-career attrition compared to optometrists and display median registration tenures of 15.8 years (31.5 years for optometrists). By contrast, optometrist exits are heavily weighted towards retirement-age bands, consistent with a more senior, longer-tenured workforce.
43. Factors against setting lower fees for dispensing opticians include the potential negative impact on both relationships with optometrists and perceptions of the standing of the profession. In some areas dispensing opticians create more work for us, for example 3% failed our CPD requirements in the 2022-24 cycle compared to 1% optometrists. Further, our registrant survey indicates that employers are more likely to pay renewal fees for dispensing opticians (66%) than optometrists (44%), which may offset concerns about ability to pay³.
44. The table below shows the impact of introducing lower fees for dispensing opticians on the standard registration renewal fee using a sliding scale. For example, using registrant numbers on 31 March 2025 and the £415 standard renewal fee as a baseline, if fees for dispensing opticians were reduced by £50 to £365, and assuming no changes to student fees and no administrative costs, every optometrist and business registrant would need to pay an extra £15.71.

¹ In 2024/25, optometrists made up 58.6% of the register but accounted for 74.2% of registrants under fitness to practise investigation. Dispensing opticians represented 21.3% of the register and 11.7% of those under investigation. Student optometrists comprised 16.2% of the register and 11.7% of those under investigation.

² ABDO's [Pay and Reward Survey 2025](#) found dispensing optician salaries typically range £28-34k. with the average calculated at £31,262. This includes all respondents working both full and part-time.

³ In ABDO's [Pay and Reward Survey 2025](#) around nine in ten respondents said their employer paid their GOC renewal fee.

Table 2 – modelling the impact of lower fees for dispensing opticians

Reduction for DOs	New DO fee	New standard fee
£25	£390	£422.85 (£7.85 increase)
£50	£365	£430.71 (£15.71 increase)
£75	£340	£438.56 (£23.56 increase)
£100	£315	£446.42 (£31.42 increase)

Option 2 – Higher fees for registrants with specialist qualifications

45. On 31 March 2025, there were 3,318 registrants with GOC approved specialist qualifications including 1,196 contact lens opticians and 2,122 independent prescribers. 24,332 fully qualified registrants did not have these qualifications.
46. We already charge a separate fee for initial registration as a contact lens optician or optometrist with independent prescribing rights. We could set higher annual registration renewal fees for these registrants. This would reflect their more advanced clinical activities and the extra work for GOC to maintain the specialist registers and qualification approval. A factor against setting higher fees for this group is the risk of disincentivising registrants from seeking specialist qualifications, although this is likely to be small. We are mindful that future generations of optometrists in Scotland will qualify with independent prescribing rights, which would create differences in fees between UK nations.
47. Given the relatively small number of registrants with specialist qualifications the impact on the standard renewal fee would be modest. For example, modelling the impact based on the £415 standard renewal fee and assuming no changes to student fees, a £50 supplementary fee for specialty registrants would yield savings of £6.60 for every fully qualified and business registrant (see Table 3).

Table 3 – modelling the impact of higher fees for specialist registrants

Supplementary fee	New specialist fee	New standard fee
£25	£440	£411.70 (reduced by £3.30)
£50	£465	£408.40 (reduced by £6.60)
£75	£490	£405.10 (reduced by £9.90)
£100	£515	£401.81 (reduced by £13.19)

Option 3 – Lower fees for newly qualified registrants

48. We could introduce lower fees for newly qualified registrants over an agreed period. This discount could be the same across all eligible years or tapered so that it is highest in the first year and reduces over the remaining years. This

would support a fairer fees model reflecting levels of graduate debt and lower salaries in the early career stages. While more complex to administer than a flat fee model, this would be simpler than some other options under consideration. We would not need to require registrants to demonstrate their eligibility since this information is already held within our registration systems.

49. For illustrative purposes, we have modelled a 50% reduction in the first two years, which is the system used by the Health & Care Professions Council.⁴ On 31 March 2025, 2,234 registrants had joined the register within the last two years (excluding restorations). Applying a 50% reduction on the £415 main fee to this number of registrants would reduce annual fee income by £463,555. Assuming no annual administrative costs, and that students would not pay extra, we would need to increase the standard registrant fee paid by every fully qualified and business registrant by £17.67 to make up the shortfall.

Option 4 – A more generous low-income discount scheme

50. GOC currently operates a low-income discount scheme whereby registrants are eligible for a discount on fees if their total earnings are less than £16k. The size of discount has increased over the last two years since the low-income fee was kept the same while the standard fee increased. The low-income fee for 2026/27 is £290, £135 lower than the main fee (a 33% discount). The scheme is well used; 2025/26 renewal data shows 942 successful applications to the scheme, representing 3.9% of fully qualified registrants. Female optometrists between the ages of 30-39 were the highest number to apply successfully, while 36% of successful applicants were dispensing opticians.
51. We could consider increasing the size of the low-income discount and/or the thresholds at which it applies. The General Medical Council (GMC) applies a 50% discount for registrants earning below £36k. Since we do not collect information on salaries it is not possible for us to model the financial impact. However, if we were to match the GMC's scheme, the available data indicates that many dispensing opticians and some newly qualified optometrists would be eligible for the discount. Creating a more generous low-income scheme has the advantage of building on existing practice and could present an alternative to introducing new elements to the fees system, as options 1 and 3 would do.
52. Factors against this option include that it does not reflect the cost of regulating different groups and may rely too heavily on ability to pay considerations. Also, it would introduce greater uncertainty into our income projections. Low income is not always a good indicator of ability to pay, for example some people

⁴ The General Medical Council and General Osteopathic Council also set lower fees for newly qualified registrants.

choose to work fewer hours because they can afford to. If we extended the scheme to more registrants, we are likely to need more rigorous application checks to mitigate the risk of abuse. This would incur additional administrative costs that would be reflected in higher annual renewal fees for other registrants.

Option 5 – Lower fees for registrants on maternity or similar leave

53. We could consider lower fees for registrants on maternity, paternity, parental or adoption leave. The General Osteopathic Council and the Solicitors Regulation Authority operate such schemes.
54. In favour, this would support a fairer fees model and mitigate the risk of these professionals not returning to the profession once their period of leave ends. Given these registrants are not practising they present a lower regulatory risk. Further, it should be relatively straightforward for registrants to demonstrate eligibility for the discount. Even so, we would incur administrative costs that would need to be passed on through the fees system.
55. Our 2024/25 annual EDI monitoring reports suggests 1,933 registrants (6%) were pregnant or on maternity or paternity leave. Using these figures as a starting point, and assuming a 50% reduction in the annual fee and that students would not pay extra, we would need to increase the standard registrant fee by £10.75 for every fully qualified and business registrant to make up the shortfall.

Other options we have discounted

56. In theory, it would be possible to introduce a system of graduated fees based on earnings or working pattern (e.g. full or part-time). However, while informed by ability to pay factors, these options would not reflect the costs of regulation, it would be difficult to verify the information and would be costly to administer. This is further complicated by earnings and working patterns changing in-year. Above we consider other options for differential fees informed by income considerations that would not present as many practical difficulties.

Equalities considerations

57. The potential equalities impacts of options for change are important to consider. Whilst this discussion paper does not set out firm proposals, it is intended to support informed and balanced conversations about fairness, affordability and sustainability, including how different approaches may affect different groups.
58. At this stage an Equality Impact Assessment (EIA) has not been undertaken. Should the GOC move from discussion to specific proposals, an EIA will be

developed to assess potential impacts in more detail, including cumulative and intersectional effects, and to identify mitigations where appropriate.

59. Drawing on data from our 2025 EDI annual monitoring report and registrant surveys, it is clear that registrant groups are not homogeneous, and that income, role, and demographic diversity do not align neatly. As a result, changes to fee structures may have different effects depending on professional role, career stage, working patterns and personal circumstances.
60. The demographic profile of dispensing opticians and optometrists differ in important ways. These factors will shape who would pay lower or higher registration renewal fees under some of the change options. Dispensing opticians as a group are more likely to be female (66.1%) compared to optometrists (62.2%), and more likely from a white background (69.4%) than from an ethnic minority background (20.5%). Optometrists show greater ethnic diversity overall (40.9% white and 48.1% ethnic minority). At the same time, dispensing opticians typically earn less on average than optometrists. This highlights that affordability, professional role and demographic representation do not align neatly, and that no single fee option can be assumed to be equitable in all respects. The student profile in both professions is changing, with a higher proportion of female and ethnic minority registrants, which in time will alter the profile of fully qualified registrants.
61. Other options may interact differently with equality considerations. Discounts linked to maternity, parental or adoption leave are likely to disproportionately benefit women, reflecting patterns of caring responsibility. Options linked to income thresholds or payment flexibility may particularly affect part-time workers and those in lower-paid roles. GOC survey data suggests female and ethnic minority registrants are more likely to work part-time which may intersect with affordability considerations across several options.
62. Analysis of data on those leaving the register shows that female registrants account for ~60% of all leavers, broadly in line with their representation in the workforce. However, they are disproportionately concentrated in younger and mid-career exit routes: females aged 25–44 leave at nearly three times the rate of males in the same age bands. Females also have shorter registration tenures (median 9–12 years, compared with 12–16 years for males).
63. How fees are paid is also relevant to equality and inclusion. Registrants who pay their own fee, rather than having it covered by an employer, and those earning the least, are likely to experience changes to fees more acutely. We do not collect information about individual professionals' incomes. Our registrant survey suggests that 54% of optometrists and 30% of dispensing opticians paid their last renewal fee themselves. Groups more likely to self-fund included

males, ethnic minority registrants, part-time workers, those working outside large multiples, and those on the register for two years or less.

64. Taken together, these factors highlight the importance of considering not only whether a fees model is fair in principle but how fairness is experienced across different groups. Feedback from this discussion paper will help the GOC understand how registrants perceive the balance between the different factors that might inform the setting of fees and will inform any future proposals and associated impact assessments.

Q2. Which statement below best reflects your general view on differential fees? (Please note we will invite you to comment on each of the five options in the next question.)

- A – GOC should retain the current approach of a simple flat fee structure**
B – GOC should consider introducing differential fees

Please provide comments

Q3. Please indicate your support for the five options listed below on a 1-10 scale (1 = lowest support, 10 = highest support).

Option 1 – lower fees for dispensing opticians

1 2 3 4 5 6 7 8 9 10

Please provide comments

Option 2 – higher fees for registrants with specialist qualifications

1 2 3 4 5 6 7 8 9 10

Please provide comments

Option 3 – lower fees for newly qualified registrants

1 2 3 4 5 6 7 8 9 10

Please provide comments

Option 4 – a more generous low-income scheme

1 2 3 4 5 6 7 8 9 10

Please provide comments

Option 5 – lower fees for registrants on maternity, paternity, parental or adoption leave

Please provide comments

Enhancing payment flexibility

65. All registered individuals and body corporates can set up a direct debit to pay their annual renewal fee in advance of each annual renewal cycle beginning, but registrants currently cannot pay in instalments during the renewal year. Given the challenging macroeconomic environment, we are exploring options that would allow registrants to pay the annual fee in periodic direct debit instalments supported by enforcement mechanisms for missed payments.
66. Although our legislation would allow us to amend our Fee Rules to permit registrants to pay fees in instalments, we could not remove individuals from the register for missed payments until the end of the registration year. From our perspective, this makes an instalment system unviable due to the possibility of accumulating bad debt, the costs of which would ultimately fall on registrants.
67. At this stage, we are interested in establishing if there is sufficient support in principle for instalment payments. If there is, we would seek legislative change, but we are mindful that the UK Government has indicated that change to our legislation is unlikely to be prioritised within the current parliament.
68. Some other healthcare regulators allow payment by direct debit instalments. The General Dental Council and Nursing & Midwifery Council both allow payment over four instalments per year, while the Health & Care Professions Council use a system of four payments over a two-year renewal cycle. Social Work England allows registrants to pay the annual fee over two instalments.
69. We used our 2025 registrant survey to understand interest in such a system. Whether they paid themselves or their employer paid, all respondents were asked whether they would like to pay their registration fee in instalments throughout the year. Just over half (53%) said they would wish to pay in instalments throughout the year, suggesting significant interest in this payment option. Dispensing opticians, student dispensing opticians, and those who work full-time were more likely to be interested in paying the fee in instalments.
70. Payment of the renewal fee is a condition of continued registration so any such system would require enforcement mechanisms to deal with missed payments.

At the Nursing & Midwifery Council, if a payment is missed registrants must pay by card by the end of the quarter; registration automatically lapses if this is not paid. At the General Dental Council, if a registrant misses a payment, they must pay the remaining balance for that year by the end of the month in which the instalment was due. If they miss that deadline, they may be removed from the Register and will need to apply for restoration. If that happens, the registrant will not be able to pay by instalments for two years.

71. While allowing payment by instalments could support registrants to spread the cost of regulation, a disadvantage is that it would introduce more risk for them. Direct debit companies would charge GOC transaction and subscription fees, which we would need to pass on to registrants. Given the low student renewal fee, we would not offer instalment payments to this group. We have estimated the impact of bank charges, administration costs and loss of bank interest of £94,000 per year based on a 25% adoption rate. If this cost was spread evenly over all registrants except students, it would equate to £3.47 per registrant.

Q4. Would you like the GOC to allow payment of the annual renewal fee by direct debit instalments?

A – Yes

B – No

C – Don't know/unsure

Please provide comments

Business registrant fees

72. As context, GOC had 2,934 business registrants on 31 March 2025. We do not collect information about the size of business registrants, but Office for National Statistics data⁵ suggests that 73% of 'retail opticians' are microbusinesses (0-9 employees), 25% are small businesses (10-49 employees), most others are medium-sized businesses (50-249 employees) and there are a handful of large businesses (250+ employees). Only incorporated businesses may register with GOC, so most businesses not registered with us are likely to be small.
73. As described in the overview, there is low satisfaction with registration fees among businesses. In the 2025 business registrant survey, only 11% of respondents considered fees to be reasonable. In open-text responses,

⁵ UK Business Counts data based on VAT and PAYE returns. [UK Business Counts - Nomis - Official Census and Labour Market Statistics](#)

reasons given concerned a perceived high cost of the fees (21%) as well as a lack of value for money (18%), followed by a sense of injustice at having to pay both a professional and a business registration fee (13%) or at the blanket approach to determining both dispensing optician and optometrist fees (3%). Several business registrants also indicated that there was a lack of visible benefit to registration (8%) and that the GOC should be doing more with the fees to protect businesses from unregulated competition (8%).

74. Against this backdrop, we wish to explore if a different approach is merited.

Balance between individual and registrant fees

75. In 2024/25, the GOC obtained 87.9% of renewal fee income from fully qualified registrants, 1.6% from students and 10.5% from businesses. The percentage of our fee income from businesses is lower than other regulators. For comparison, the General Pharmaceutical Council charges a higher renewal fee to pharmacy premises (£392) than individual pharmacists (£276). Using data in its 2023/24 annual report, it generated approximately 21% of fee income from premises. When the Solicitors Regulation Authority determines the level of the fee each year, it makes sure that most of the fee income (60%) is generated from the firm fee, with the remainder coming from the individual fee.

76. In terms of the cost of regulation, volume of fitness to carry on business activity fluctuates each year but in 2024/25 business registrants made up 8.4% of the register but accounted for 12.4% of investigations. More widely, there has been a shift in focus towards business regulation in our work. Therefore, one option is to set higher fees for businesses than for individuals. However, there are disadvantages with this approach. Until legislative reform makes it mandatory for all businesses carrying out specified restricted functions to register with GOC, there is a risk that some existing business registrants would choose to no longer register. This would reduce public protection as well as mean we may need to increase fees to recover the lost income. Further, our survey data suggests that employers pay the renewal fee for around 44% of individual registrants; this is more common for those working at multiples (58%) than independents (38%). Increasing the business registrant fee could be seen as unfair and disincentivise businesses from paying individual renewal fees.

77. For illustrative purposes, the table below models by how much the registration fee for fully qualified individuals would reduce if fee income was rebalanced. Student fees are assumed to be unchanged for the purpose of this exercise.

Table 4 – modelling the impact of a higher proportion of business fee income

% fee income from business registrants	Business fee	Individual fee
15%	£580.65 (£165.65 higher)	£394.33 (£20.67 lower)
25%	£967.74 (£552.74 higher)	£348.79 (£66.21 lower)
40%	£1,548.39 (£1,133.39 higher)	£280.47 (£134.53 lower)

Q5. Which of the following options would you prefer?

A – No change – individual and business registrants pay the same fee

B – Business registrants should pay more than individual registrants

C – Individual registrants should pay more than business registrants

Please provide comments

Fee models for business registrants

78. Currently, all business registrants pay the same flat renewal fee. Since they are separately registered businesses individual franchises and joint ventures each pay the fee, as does the parent company. This is a simple model, but it may create fairness issues. For example, a local independent may pay the same as a multiple incorporated as a single entity. Multiples operating as joint ventures or franchises pay more than competitors formed as a single incorporated entity.
79. An alternative to a flat fee model is one based on a measurement of size, such as number of practices, turnover bands, or number of employees. This could offer a more equitable model reflecting both the cost of regulation and ability to pay. However, such a model would rely on GOC's ability to set fees based on verifiable information, which is likely to mean collecting more information from businesses based on the chosen unit of measurement. It would also require resolving some difficult policy issues, such as should a turnover-based model be based solely on income from optical activities or all activities or would an employee-based model be based on registrants only or all employees.

Q6. Which of the following fee models would you prefer?

A – No change – each separately registered business pays the fee

B – Businesses pay different fees linked to their size

Please provide comments

Q7. What should a size-based measurement be based on?

A – Number of stores

B – Bands based on number of employees

C – Bands based on turnover

D – Other

Please provide comments

Payment by instalments

80. Business registrants may also benefit from paying in instalments to manage cashflow, especially those who pay renewal fees for their registrant employees. In our 2025 business registrant survey, 49% of businesses indicated that they would like to pay their registration fees in instalments throughout the year.

Q8. Would you like the GOC to allow businesses to pay the annual renewal fee by direct debit instalments?

A – Yes

B – No

C – Don't know/unsure

Please provide comments

Providing clarity for registrants on fees

Consulting on costed plans and registrant fees

81. Currently, we consult on a draft five-year corporate strategy, which sets out proposed strategic objectives and high-level priorities over the medium-term. We do not consult on annual business plans or on annual registrant fees. The rationale for the fees we set is explained in the public Council papers when this decision is made each December. Our annual report and accounts contain comprehensive information on our activities, income and expenditure.
82. Consulting with registrants and other stakeholders on costed annual plans and fees could improve transparency and strengthen registrant engagement with fees. However, there are some arguments against this. Firstly, many of our highest costs are fixed (e.g. rent) or demand-led (e.g. our fitness to practise caseload and quality assurance of approved qualifications). Secondly, there is the practical consideration that consulting on costed plans and fees would add significant time to our business planning process, which already begins nine

months in advance of the beginning of the next financial year. Starting this process earlier and/or condensing internal processes to enable an external consultation period risks our plans becoming divorced from reality.

83. When our legislation is updated, in line with those for other healthcare regulators, we expect requirements on transparency and accountability in relation to fee setting and reporting to be strengthened. These requirements should become clearer following the government's consultation on the General Medical Council's legislation, which this is intended to serve as a blueprint for reform to all healthcare regulators' legislation.
84. In the medium-term, we consider that it would be beneficial to consult on a costed draft five-year corporate strategy. Improvements in our long-term financial forecasting mean that we can now project future income needs with more confidence. Within this, we can indicate our expectations on the direction of registrant fees over this period, including the assumptions these are based on, such as register growth. We do not consider it practicable to consult on costed annual business plans, however the detail of these budgets will be available in our published Council papers and our Annual Report and Accounts.

Single or multi-year fees

85. One option for change is for GOC to determine the renewal fee for the next two (or more) years in advance. The renewal fee is underpinned by assumptions about registrant numbers and other factors, which are subject to change. We would normally expect to manage fluctuation in fee income through reserves but would need a mechanism to adjust fees in exceptional circumstances.
86. The main benefit of this option is that it could provide greater certainty to registrants about the cost of regulation over a longer period. However, a risk is a safety-first incentive for GOC to raise fees more than might be necessary to offset unknown events. It could also constrain our ability to manage resources efficiently and effectively. This risk would be greater if fee cycles were set over a longer period, such as linked to our five-year strategy. Changes in legislation, fitness to practise caseload, qualification providers and other areas, could have a significant impact on the income we receive or need to deliver our work. Although, currently, we have a good level of reserves, moving to multi-year fee cycle now may be unattractive given volatility in world markets.
87. In our 2025-30 corporate strategy we state that we expect overall income levels to increase modestly, in line with inflation and register growth. Given this and the disadvantages of multi-year fee cycle models, we do not favour this option but would like to understand if registrants would prefer such a system.

Q9. Would you like us to consult on costed plans and fees?

A – Yes

B – No

C – Don't know/unsure

If yes, please describe how you would like to see this work.

Q10. Would you like us to consider introducing multi-year fee cycles?

A – Yes

B – No

C – Don't know/unsure

Please provide comments

Welsh language

88. Under the Welsh language standards, we are required to consider what effects, if any (whether positive or adverse), the policy decision would have on opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language.
89. At this discussion stage, we have assessed that the options outlined relate to structure and payment of fees and do not directly affect opportunities to use the Welsh language or affect the way in which the Welsh language is treated. Should proposals be developed further, Welsh language considerations would be revisited as part of any formal impact assessment.

Q11. Will the proposed changes have effects, whether positive or negative, on:

(i) opportunities for persons to use the Welsh language, and

(ii) treating the Welsh language no less favourably than the English language?

- a) Yes re (i)
- b) Yes re (ii)
- c) No re (i)
- d) No re (ii)
- e) Not sure re (i)
- f) Not sure re (ii)

Please provide comments.

Q12. Could the proposed changes be revised so that they would have positive effects, or increased positive effects, on:

- (i) opportunities for persons to use the Welsh language, and**
- (ii) treating the Welsh language no less favourably than the English language?**

- a) Yes re (i)
- b) Yes re (ii)
- c) No re (i)
- d) No re (ii)
- e) Not sure re (i)
- f) Not sure re (ii)

Please provide comments.

Q13. Could the proposed changes be revised so that they would not have negative effects, or so that they would have decreased negative effects, on:

- (a) opportunities for persons to use the Welsh language, and**
- (b) treating the Welsh language no less favourably than the English language?**

- a) Yes re (i)
- b) Yes re (ii)
- c) No re (i)
- d) No re (ii)
- e) Not sure re (i)
- f) Not sure re (ii)

Please provide comments.

Impact assessment

90. We have not produced an impact assessment since this is a discussion paper rather than a consultation on specific proposals. However, please see paragraphs 53 to 56 above which consider equalities dimensions.

Section 3: How to respond to the discussion paper

29. We invite responses from 27 April to 20 July.
30. We would be grateful if you could input your responses into our [consultation hub](#) so that we can collect information about you or your organisation and whether your response can be published.
31. However, if that is not possible, you can respond by emailing consultations@optical.org. Please ensure you provide us with information on whether you are responding on behalf of yourself or an organisation, which organisation you are responding for, and whether we have permission to publish your response and name yourself or your organisation.