



THE COLLEGE OF  
OPTOMETRISTS



Friday 17<sup>th</sup> April 2026

Leonie Milliner  
GOC Chief Executive and Registrar  
General Optical Council  
Floor 29, One Canada Square  
Canary Wharf  
London E14 5AA

Dear Leonie

We are writing in relation to the GOC's consultation on reform of the system of continuing professional development (CPD) for the optical sector.

The Association of Dispensing Opticians (ABDO), the Association of Optometrists (AOP), the College of Optometrists (the College) and the Federation of Optometrists and Dispensing Opticians (FODO) are the main optical sector bodies. We represent the vast majority of optometrists, dispensing opticians and optical businesses. ABDO, AOP and The College of Optometrists are also the largest providers of CPD.

We will be submitting our own individual responses to the consultation, which reflect our particular perspectives and the views of our members. However, there are important points on which we all agree and which we feel it would be helpful to bring to your attention. Please treat this letter as an additional response to the consultation and we are happy for the contents to be published.

First of all, while we share the GOC's ambition to move to a more flexible, outcomes-focused approach to CPD, it will be necessary to ensure that the conditions are in place to ensure an effective transition to the proposed new system. At present, the GOC's proposals do not give confidence that this transition will be managed effectively.

Secondly, we note that the policy objectives stated in the consultation document do not reference the GOC's statutory objectives, including the overarching statutory objective of public protection. Neither do they reflect the Professional Standards Authority's Standards of Good Regulation, which prioritise the core role of regulators in protecting patients and reducing harms; promoting professional standards; and maintaining public confidence in the professions. In line with the core role of regulators, as

described by the PSA, we suggest that the following principles should be embedded in the proposed new system of CPD:

- It should **maintain public protection**, which is ultimately how the effectiveness of any system of CPD for healthcare professionals will be judged. To achieve this goal, the proposed new system should ensure that registrants maintain their core competencies as well as encouraging further professional development.
- It should **provide a framework that gives sufficient clarity for registrants** about the nature of the CPD, including areas and types, which is expected of them in order to maintain their registration with the GOC. An effective CPD framework would also enable the GOC to actively promote professional standards rather than relying on reacting to complaints that registrants have fallen short of the expectations set out in the Standards of Practice for Optometrists and Dispensing Opticians.
- It should **be evidence-based**. We note that in developing the current proposals the GOC has not updated its previous research into the patient-safety risks associated with optical practice, including the risks relating to isolated practitioners. Ensuring that the CPD system will address the relevant risks will be essential in maintaining public confidence in the optical professions. The system should also reflect evidence as to the effectiveness of different types of CPD, including the research evidence as to the value of interactive learning. We note also the importance of reflection in enabling registrants to identify and evidence what they have learnt from CPD and its impact on their practice, something which is intrinsic to an outcomes-based approach.
- It should **be based on a full assessment of the impacts** that would flow from the changes, including the costs and benefits for businesses, and potential unintended consequences. Such an assessment is required before the finalising the proposed changes.
- It should **be capable of consistent application** across the sector. This is one reason why we do not support placing additional responsibilities on optical businesses as part of the proposed new system. We expand on this point below, but note here that relying on increased involvement from businesses would be ineffective as:
  - Not all registrants are employed by optical businesses
  - At the current time, a substantial number of optical businesses are not required to register with the GOC and there is no timeline for securing the legislative change needed to rectify this.

Thirdly, as indicated in the previous paragraph, we disagree with the GOC's intention to 'leverage' the role of optical businesses by placing additional responsibilities on them, including the responsibility of ensuring that registrants have an up-to-date personal development plan. CPD should promote professional development in a broad sense and while employers may be expected to set objectives for, and appraise the performance of, the registrants they employ, it is not reasonable to expect all individual

optical businesses to have the organisational structure, resources and expertise to support and enable their employees' wider, longer term professional development.

While we understand and support the ambition to move towards a more outcome-focused approach to CPD that empowers registrants, successfully navigating this transition will involve substantial change over a significant period, including major cultural change. Therefore, we encourage you to work closely with us, as the main sector bodies, during this period of change and to establish effective mechanisms to support this collaboration.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alistair Bridge'.

Alistair Bridge, Chief executive, Association of British Dispensing Opticians

A handwritten signature in black ink, appearing to read 'Adam Sampson'.

Adam Sampson, CEO, Association of Optometrists

A handwritten signature in black ink, appearing to read 'Ian Humphreys'.

Ian Humphreys, Chief Executive of The College of Optometrists

A handwritten signature in blue ink, appearing to read 'Harjit Sandhu'.

Harjit Sandhu, CEO, FODO