

Response re CORU Corporate Strategy 2013-2016

FODO Ireland is a representative professional body for opticians in business and individual optometrists in Ireland. Our members include both independent and corporate opticians, which operate as primary eye care contractors, and individual practitioners. Between them FODO Ireland members deliver over 55 per cent of the eye care by volume and over 360,000 eye examinations a year in the Republic.

We would like to thank CORU for the opportunity to comment on your draft strategy for the forthcoming years. As you will appreciate, optometrists and dispensing opticians are soon to be transferred under CORU's remit – a development we have welcomed. Although our members are in the main practice owners (i.e. the providers of optical services), we have some individual practitioners in our membership and have replied from the perspective of both.

We have responded below in the requested format, however the majority of our comments are made under Question 6 as they do not fit properly elsewhere. Please feel free to contact Mark Nevin on mark@fodo.com if you have any questions about our response.

1. Details of Respondent (you do not need to provide your personal information if you would prefer not to)

Details of Respondent
(you do not need to
provide your personal
information if you would
prefer not to) Name:

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2. Are you replying in a personal capacity or on behalf of an institution or organisation?

- Are you replying in a personal capacity or on behalf of an institution or organisation?

- On behalf of an institution
- On behalf of an organisation

If you are replying on behalf of an institution or organisation, please enter the name of this institution or organisation:

Federation of Ophthalmic and Dispensing Opticians (

3. Is the document clear, well structured and easy to read?

- Yes
- No

If "No" please comment

4. Do you think that CORU's Vision, Mission, Values are appropriate and clear?

- Yes
- No

If "No" please comment

5. Do you think that CORU's strategic objectives are appropriate and clear?

Yes

No

If "No" please comment

6. Do you have any general or specific feedback on the document? In your response, where applicable, please specify the section to which you are referring.

General Comments on Overall CORU Strategy

We agree with the underlying purpose and principles and the stated aims to deliver effective regulation of the healthcare professions and feel that these are aligned with CORU's statutory remit. We welcome the clear and transparent approach to regulation and maintenance of the registers, and in particular your stated willingness to engage actively with stakeholders and learn from international best practice.

We agree with CORU's intention to regulate in a manner that delivers quality patient care by setting and maintaining high professional standards. Nevertheless whilst we recognise that CORU aims to be 'effective', we feel it would be sensible and in the public interest to state explicitly that CORU will regulate in a manner that is proportionate to the risks involved in the sphere of competence of the respective regulated professions.

Representations to Government on Transfer of Opticians Board (linked to Challenge 1, Strategic Objective (SO) 2)

We have recently made representations to the Ministers and the Department of Health regarding the transfer of functions from the Opticians Board to CORU, which we hope CORU has seen. We would be happy to share those with CORU if that is helpful, however we like to reiterate here that we would like to see equal representation of the optometrist and dispensing optician professions both within the Optical Registration Board and on the overarching Council (alongside the other twelve professions that you regulate). We feel it is only fair that each profession has equal say in CORU's governance structures. We would also wish to see a clear system of professional regulation that allows optometrists and opticians to practise within their scope of their training and competence and to delegate and supervise trained staff to perform tasks as appropriate. This would make the best use of clinicians' skills and facilitate the best access to community eye care for patients.

As we outlined to the Government, we are also pleased to offer our assistance to that transfer of functions, should that be helpful, and to work with CORU to revise and tailor the regulatory regime for community eye care.

Fitness to Practise for Diverse Professions (Challenge 1, SO 4)

Given the diverse nature of healthcare delivery amongst CORU's registered professions, we would welcome some reassurance that the relative risk of each healthcare professional's activities will be taken into account when tailoring FTP systems and determining resource allocation within CORU.

As above, we are pleased to see CORU aims to complete the transition to bring the Opticians Board under its remit (Strategic Objective 2). However, we have some reservations about Strategic Objective 4, "to rollout the fitness to practise framework promptly once registers are open". We feel that as part of this transfer and integration process, Optometrists and Dispensing Opticians, and their representative bodies, should be actively involved in the development of fitness to practise framework that is specific to the professions and proportionate to risk posed to the public - which has been shown in many countries to be low.

Each profession under CORU's remit requires a tailored regulatory framework and fitness to practice procedures are at the heart of this. We would be keen to work with CORU to ensure this transition is efficient and Optometrists and Dispensing Opticians are not unfairly subject to a fitness to practise framework that was designed through consultations without them being invited to comment. We look forward to working with CORU to ensure the public continue to receive high standards of eye care in the community across Ireland.

Projected Costs of Regulation (linked to Challenge 4, SO SO 9)

We note the planned fee of €295 per registrant and given the difficult economic climate that we all face, we would urge CORU to deliver value for money for registrants and to keep cost effectiveness central to CORU's operations. We also hope and indeed anticipate that CORU will maximise economies of scale as more and more registrants come under CORU's remit, and that it will be possible to deliver lower registration fees per CORU registrant.

We would also wish to see a transparent process for applicants for CORU registration and for educational establishments that ensures sufficient quality and numbers of graduates to meet community healthcare needs.

Supporting CORU's Work (linked to Challenge 5, Objective 11)

We will encourage our membership to participate in CORU's governance structures and to devote time to support CORU's work (in particular employers which CORU has recognised as having a key role).

CORU Outputs to Date (linked to Challenge 6, SO 12)

We have found CORU's outputs and communications so far to be clear and well structured. As CORU will shortly be developing the code of ethics and guidelines for the optical professions, we would like to add that we found the recently published *Code of Professional Conduct and Ethics for Social Care Workers* to be balanced and proportionate and we look forward to working with you to develop a similar code for optometrists and opticians.

Stakeholder Engagement (linked to Challenge 6, SO 12)

As stated above, we are pleased to read that CORU plans to engage actively with stakeholders and we would be happy to assist CORU to establish a network with other regulators of optometry and opticians across Europe. In this respect, given the similar professional structures, modes of delivery of community eye care services, cultural and linguistic links, and movement of optometrists and opticians between the two countries, we would recommend that CORU establishes good working relations with the General Optical Council in particular.

7. Do you think we have omitted any area of importance?

- Yes
- No

If "No" please comment

See comments above under Question 6 in particular those relating to the relative risk of the respective healthcare professions under CORU's remit.

8. Are there any other comments you wish to make?

No.

This response has been submitted by

Mark Nevin

Director of Policy and Strategy

FODO Ireland