

## **CORU response – optometrists and opticians**

### **Is the code clear and easy to understand?**

On the whole the Code is clear and easy to understand. There are a few places where the language could be easier, and we have made detailed comments on those points below.

We recognise and welcome the fact that the Code has sought not to be overly prescriptive, but are concerned that in a number of places without clarification or additional guidance it may go too far in the other direction and leave the registrant with no clear sense of what is expected of them. Again we have highlighted specific areas of concern below.

### **Do the three headings (conduct, performance, ethics) cover all areas of optical practice/**

We have not identified any areas that are missing from the Code.

### **Comments on conduct section**

#### 2. Confidentiality

It would be clearer if the second half of 2(c) – Stay up to date with best practice developments – was separated out and became 2(d).

It would be helpful to provide links or signposting to guidance which sets out the circumstances in which a breach of confidentiality is appropriate and justifiable.

3(c) – it would be clearer to replace “ need” with “responsibility”.

4.(c) – it would be helpful to provide links or signpost to guidance which explains who the appropriate authority is that you should notify serious breaches of behaviour or malpractice too, and also to give a definitions of serious breaches of behaviour and malpractice.

### **Comments on performance section**

5(a) – suggest changing to “taking medication” rather than “on medication” is clearer.

9 (c). Informed consent – if that patient cannot give informed consent themselves, then consent should be given by an authorised person (family member or carer). who can? What is the “any guidance issued by appropriate authorities”? Should that be clarified.

9(e) Again a link or signposting to guidance issued by appropriate authorities would be helpful.

10(a) Communicating with patients – we suggest adding those with a sensory impairment to the list of those whose special needs should be taken into account in communications.

It is somewhat confusing that the numbering starts at (a) again after “you should” – there are two 10(a) and 10(b). It would be clearer to simply continue with the sequence after “you should” to have 10(e).

10(b) – co-operating and sharing knowledge (the second 10(b)). This seems to be in the wrong place: it would sit better as part of 11, which is concerned with assisting and advising colleagues, new registrants and students.

12. This is confusingly phrased. We suggest amending as follows:

“If you are involved in supervising, teaching, training, appraising and assessing your students in your profession or other professions,

You must:

Do so fairly and respectfully using agreed criteria.

You should:

Meet your professional obligations to teach...”(etc)

16 – should provide a link or signpost to who the proper authority is to notify of risks to patients.

### **Comments on ethics section**

17 – suggest adding the words “and act in accordance with” , so that the requirement is:

“make sure you read, understand and act in accordance with this code”

We are concerned that the code includes a requirement to “be aware of the wider need to use limited resources...” and a duty to “assist in the efficient and effective use of resources and to give advice on their appropriate allocation”. It would seem that this section has been taken from codes that apply to those who work in the public sector. The vast majority of optometrists work in the private sector. As such this section appears to impose a duty on them to have regard to the finances of their practice or employer. We suggest amending the first line to refer to the “wider need to use publicly funded services as efficiently and responsibly as practicable”. The second reference should also replace “resources” with “public funds”, however we would question whether an optometrist has a duty to give advice on their appropriate allocation and suggest that this section be removed.

20 – this section should start with the “If you undertake or participate in research”. Sub paragraph (a) states that you should take part in research. We can see no justification for this and suggest it be deleted.

Appendix A. Guidance from a professional or representative body should be added to item 2 and item 4 should be amended to “professional or representative body”.

### **Is the form useful?**

The on-line form makes it difficult for a respondent to save a copy of their response for their own records. As a representative body, we will also want to share our response with our members. It would be helpful therefore if the form could also be made available in PDF or Word format.