



Association of British Dispensing Opticians



ASSOCIATION OF OPTOMETRISTS



THE COLLEGE OF OPTOMETRISTS



Federation of Ophthalmic and Dispensing Opticians

The Council for Healthcare Regulatory Excellence (CHRE): Draft Regulations 2008

This is a joint response from the Association of British Dispensing Opticians (ABDO), Association of Optometrists (AOP), the College of Optometrists and the Federation of Ophthalmic & Dispensing Opticians (FODO).

Together ABDO, AOP, the College and FODO represent the 10,500 optometrists and over 5,000 dispensing opticians and optical businesses who provide high quality and accessible eye care services throughout the UK. Optometrists and opticians represent a diverse ethnic mix.

We have confined our responses to those questions that we feel are relevant to our members, the eye care providers working mainly in the community.

Conditions of appointment for chair and non-executive members of the council

Q1 Do you agree with the reasons for disqualifying a person from appointment as a member of the CHRE council (as outlined in regulation 2 (2)) If not, please specify which reasons you disagree with and why.

Agree ()

Disagree (✓)

Unsure ()

Comments

Regulation 2(2)(j) represents a significant departure from the previous position as neither the professions nor the regulatory bodies are now represented on the council.

There does not appear to be any restriction in respect of the appointment of the chair / non-executive members of the council on grounds of physical or mental ill-health.

Tenure of appointment chair and non-executive members

Q2 Do you agree with the term of appoint of 4 years for the chair and non-executive for CHRE membership? If not please specify the number of years you think is appropriate.

Agree (✓)

Disagree () number of years _____

Unsure ()

Comments

Q3 As outlined in regulation 3 (4), do you agree that no member should hold office for more than an aggregate of 8 years and not serve again?

Agree (✓)

Disagree ()

Unsure ()

Comments

The question above implies regulation 3(4) applies to executive members of the council as well as the chair and non-executive members. This is not provided for in regulation 3(4).

Cessation of office of chair and non-executive member

Q4 Do you agree with the reasons for the cessation of the chair and non-executive members of the CHRE council?

Agree (✓)

Disagree ()

Unsure ()

Comments

It is not clear why suspension is expressly stated in respect of the chair.

Deputising arrangements in respect of the chair

Q5 Do you agree with the deputising arrangements in respect of the chair?

Agree ()

Disagree (✓)

Unsure ()

Comments

The nomination process is unclear.

Regulation 5(3)(a)(i) implies that it is entirely a matter for the chair to determine when he/she is able to resume their duties. There does not appear to be any scope for independent/objective assessment.

Circumstances in which the chair, deputy chair and non-executive members may be suspended

Q6 Do you agree with the reasons given for suspending members from office?

Agree ()

Disagree ()

Unsure(✓)

Comments

Blanket suspension on grounds of Regulation 2(2)(e) would appear unduly punitive.

There is no provision for suspension on grounds of physical or mental ill-health.

It is not clear what measures are in place for the CHRE to suspend pending any necessary investigation relating to the conduct of the chair, deputy and non-executive members, whilst acting in their respective capacities on the council. Will this fall under Regulation 6(d)?

Circumstances in which the chair and non-executive members may be removed from office

Q7 Do you agree with the reasons given for removing members from office? If not, please specify which reasons you disagree with and explain why.

Agree ()

Disagree ()

Unsure(✓)

Comments

Blanket removal on grounds of Regulation 2(2)(e) would appear unduly punitive.

Committees appointed by the Council

Q8 Do you agree that non members of the CHRE council who undertake work for the council can do so if they comply with certain criteria in Regulation 2?

Agree (✓)

Disagree ()

Unsure()

Comments

Transitional arrangements in respect of appointment of non-executive members

Q9 Do you agree that 3 of the non-executive first appointments tenure may be for a period less than four years but not less than two?

Agree (✓)

Disagree ()

Unsure ()

Comments



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