



Anna Walker CB
Healthcare Commission
Finsbury Tower
103-105 Bunhill Row
London EC1Y 8TG

10 March 2008

Dear Ms Walker

Annual Health Check

Thank you for sending us the consultation document seeking our views on how you develop the Annual Health Check for 2008/9.

We are pleased that you propose to continue with a proportionate approach. This is particularly appropriate in respect of PCTs' relationships with the optical sector where risks to patients are low and both providers and practitioners are already heavily regulated by the General Optical Council.

The optical bodies have recently produced a clinical governance toolkit. This is available interactively on www.qualityinoptometry.co.uk. This addresses all the areas in the Department for Health's standards relating to optometric practice. We anticipate that this will be a useful tool for PCTs as well as for providers and practitioners.

However the NHS General Ophthalmic Service (GOS) sight test is significantly underfunded. This means that optometrists have no alternative – should they wish to provide NHS sight tests – but to cross subsidise the clinical care from the sale of appliances (mainly spectacles and contact lenses). In addition to this shortfall, the GOS fee includes no element to cover clinical governance, offer protected time to undertake this work, or to report on outcomes, although there are isolated areas outside the GOS where clinical governance is funded by primary care organisations. As such we would ask you to encourage PCTs to develop such local funding arrangements, through negotiation with their Local Optical Committees, for the benefit of patients.

We hope this is helpful – if you have any queries please contact us.

Yours sincerely

Sir Anthony Garret
General Secretary
Association of British
Dispensing Opticians

Bob Hughes
Chief Executive
Association of
Optometrists

Bryony Pawinska
Chief Executive
College of Optometrists

David Hewlett
Chief Executive
Federation of Ophthalmic
and Dispensing Opticians