



19 April 2007

Anna Walker CB
Healthcare Commission
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Dear Ms Walker

Annual Health Check

Many thanks for sending us the consultation document seeking our views on how you develop the annual health check for 2007/8.

We are pleased that you propose to continue with a proportionate approach. This is particularly appropriate for 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 Healthcare Commission's Standards relating to optometric practice. We anticipate that this will be a useful tool for PCTs as well as providers and practitioners when they are looking at optometric practice.

The 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 make up the shortfall with profit on 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 PCOs to develop such local funding arrangements, though negotiation with their local optical committees, for the benefit of patients.

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

Yours faithfully

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