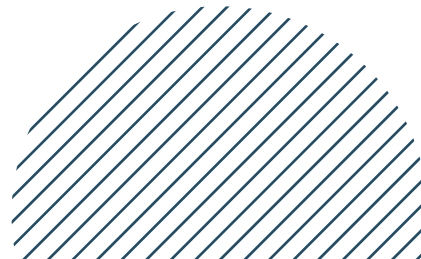
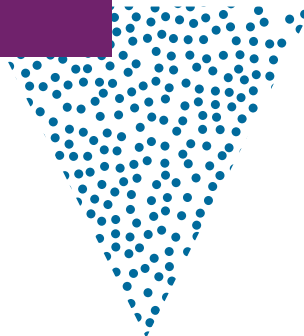


**Optical Consumer  
Complaints Service**

---

**Supporting the Professions to  
be Fit for the Future**

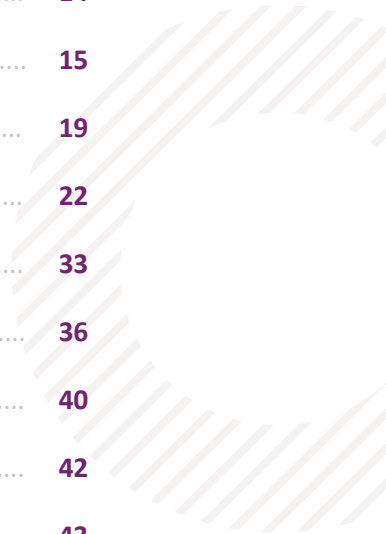
Annual Report 2020-21





# Contents

Introduction .....	3
Executive Summary .....	5
Adjusting to the 'New Normal' .....	9
Objectives and Ambitions .....	14
OCCS Overview .....	15
Feedback .....	19
Complaint Insight .....	22
Impact of the OCCS .....	33
Upstreaming .....	36
Customer Service Strategy .....	40
Conclusion .....	42
▶ Appendix 1: Nature of Complaint .....	43
Appendix 2: EDI Complainant Data Analysis .....	45
Appendix 3: 2020-23 Strategic Aims .....	48





# Introduction

Against a backdrop of the global pandemic and intermittent lockdowns, 2020-21 has been a year of agility and adjustment, aligning the strategy and vision of the OCCS to meet the demands of a seemingly new landscape. Recognising the importance of the service provided by the OCCS since 2014, we realise that it is perhaps now, more important than ever, that we identify the best ways of supporting consumers and practices at an individual level to help empower those involved in the optical sector.

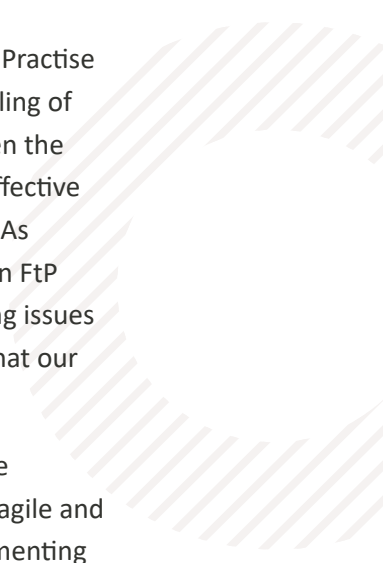
Over the last two years, we have observed a significant transition in the GOC Fitness to Practise (FtP) process, from the introduction of Acceptance Criteria to the more recent remodelling of the triage process. The OCCS involvement in these refinements has helped to strengthen the highly collaborative relationship with the GOC, allowing both organisations to deliver effective and proportionate complaint resolution through the implementation of shared insight. As we reflect on the OCCS and GOC FtP team activity during 2020-21, the ongoing trends in FtP investigations and OCCS mediations highlight the important role of the OCCS in resolving issues which do not involve allegations of impaired fitness to practise, and support the view that our strategic vision continues to meaningfully serve the sector, consumers and the GOC.

Optical professionals have looked to the regulator and stakeholders to help navigate the challenges of the last 15 months. As healthcare professionals, the sector has had to be agile and responsive with a focus on protecting public health, adhering to restrictions and implementing COVID-secure practice, while delivering optical care to patients who themselves are living in uncertain times.

At the OCCS, we see the scenarios where conflicts and disputes arise and escalate. We are also privileged to see the hard work and commitment across the optical sector in striving to support patients throughout this last year, whilst also managing individual and practice challenges and concerns.

As you will read in this report, while the total number of referrals to the OCCS fell slightly in 2020-21, in the context of sector activity, the volumes indicate an increase in escalating complaints relative to market volumes and the number of consumer interactions.

Our experience in other sectors and engagement with other ADR bodies confirms that this increased tension is not unique to optics, and is reflective of a wider public response to the pandemic and its impact on all aspects of our lives. As in other sectors, escalating complaints appear to have common trends; communication, emotive responses to situations and social distancing exacerbating potential misunderstandings. All of these factors increase the likelihood of consumer dissatisfaction and hamper local resolution.





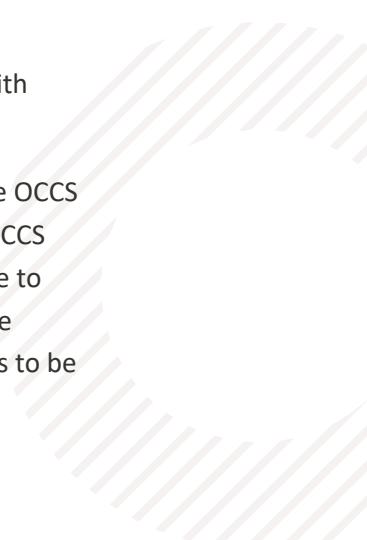
The OCCS continues to review mediation insight to share insight on the and complications which have arisen as a consequence of the COVID-19 pandemic and the restrictions.

In presenting the 2020-21 annual report, we are pleased to share that the OCCS remains a highly trusted and valuable service within the optical sector. This reputation provide the foundations for the OCCS and GOC to consider the ongoing development of the OCCS service, and also the wider evolution of mediation in regulation. Nockolds Resolution looks forward to continuing to support the GOC as it as it continues to deliver world class regulation with a firm emphasis on outstanding customer service and accessibility to all who require it.

Raising awareness of the OCCS and supporting more confident and effective consumer communication in those entering the profession remains an objective. Work in this area can resume in earnest as we enter the 2021/22 academic year and further interaction with education providers, student and pre-reg professionals.

Our latest annual report examines the recent trends in complaint resolution and how the OCCS continues to play a vital role in resolving existing and emerging complaint themes. The OCCS remains committed to sharing complaint and mediation insight to identify and contribute to resolving the issues faced by the optical sector as we emerge from the acute phase of the pandemic and beyond. In doing so, the OCCS looks forward to supporting the professions to be fit for the future!

Jennie Jones,  
Head of OCCS  
Partner at Nockolds Resolution





# Executive Summary

2020-21 has been a challenging year for all healthcare providers, both in terms of delivery of healthcare under public health restrictions and the wider societal impact of the pandemic and restrictions on consumers and practice teams. The optical sector has been no exception, and in this report, the OCCS will share the insight captured from optical consumer complaints during this period.

The OCCS has provided complaint mediation support for 1,411 referrals in 2020-21. Of these complaints, the two dominant categories are 'customer care' and 'goods and services'. This is a 12.4% decrease in referrals compared to 2019-20.

The five most common complaint scenarios referred to the OCCS in 2020-21 were:

- Consumer complains the prescription issued was incorrect
- Dispensing issues
- [Delay in supply](#)
- Fees and charges
- [Services issues related to the attitude of practice staff.](#)

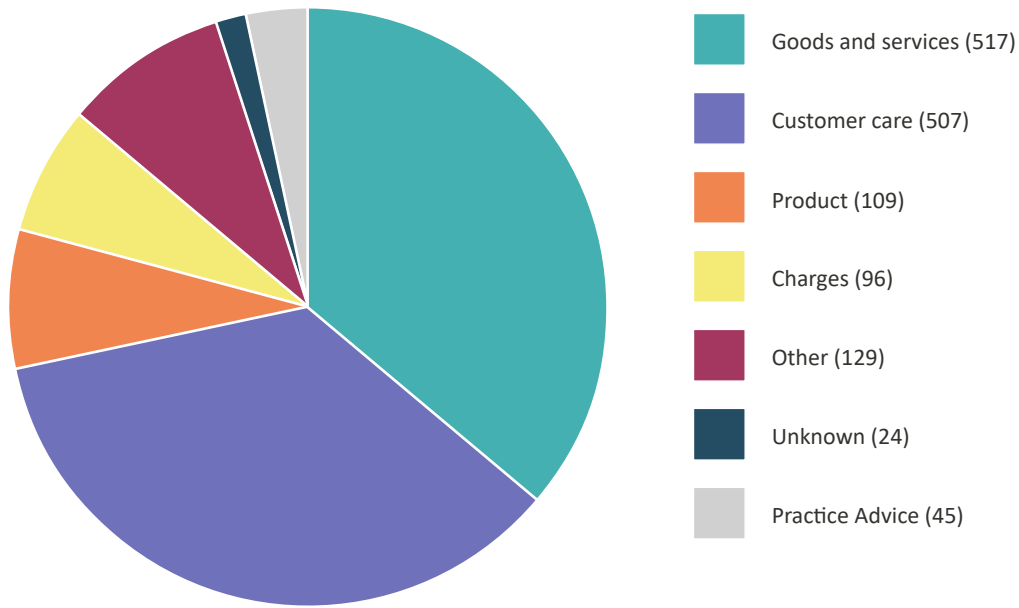
Complaints relating to delay and attitude have not previously featured in the most common complaint scenarios referred to the OCCS. This variation is likely to reflect the realities of day-to-day practice during the pandemic with the operational and emotional challenges experienced across the sector.

In the report we consider the slight fall in referrals across the 2020-21 OCCS year, and explain that in the context of sector activity, this appears to suggest an increase in escalating complaints. The OCCS considers this to be a consequence of the challenges faced by practices and consumers since March 2020. Social distancing and COVID-19 restriction have had to maintain space and distance, but this resulted in considerable changes to eye examinations, dispensing and contact lens care. Both practice teams and consumers were unfamiliar with these arrangements, experiencing external stresses around health, wellbeing and economic uncertainties. In addition, the COVID-secure measures do hamper face to face communication, which makes it harder to identify and address any consumer queries or concerns at an early stage. As complaints have escalated, resolutions have been harder to achieve, and therefore the input of an independent third-party mediator has been more valuable than ever.





**Fig. 1: Nature of Complaints**



## OUTCOMES

Outcomes in 2020-21 remain broadly consistent with the previous year. The 2020-21 year encompasses an entire OCCS year living with the COVID-19 pandemic.

Outcome - In Remit	2020-21	2019-20
Phase A - OCCS support and pre-mediation input supports local resolution	37%	41%
Phase A - OCCS advice and guidance resolves issues for consumer	36%	29%
Phase B - Consumer complaint resolved on initial contact with consumer	11%	9%
Phase B - Resolved on mediation	11%	18%
Phase B - Concluded mediation without resolution	5%	2%

The proportion of the referrals assisted within ‘Phase A’ increased during 2020-21. Phase A includes:

- Consumer complaint resolved through OCCS advice and guidance
- Pre-mediation support by the OCCS, enables the complaint to be resolved at practice level; and
- Enquiries from practices.





Referrals resolved at this stage accounted for 73% of consumer complaint referrals. This is a 3% increase on the previous year. In turn this means, the proportion of referrals requiring full mediation fell slightly from 20% in 2019-20 to 16% this year. The OCCS did however conduct more mediations during 2020-21 than in the previous year.

During 2020-21, the OCCS played a crucial role in providing advice and early mediation in complaints which were still at practice level. Where communication between consumer and practice has been logistically and emotionally challenging, the OCCS team has been able to provide effective resolution support at an earlier stage of the complaint process. The OCCS will continue to share insight and complaint management guidance to optical professionals to encourage confident and effective local resolution. This increase in 'Phase A' activity is anticipated to be directly linked to the pandemic, and we expect to see a the proportion of complaints coming to the OCCS at this earlier stage returning to pre-covid proportions if communication and access challenges ease (along with restrictions) in the next 12 months.

Mediation remains an effective method of dispute resolution, with over 293 cases referred to the OCCS being resolved through the full scale mediation process (20% increase on 2019-20)

The OCCS website continues to be a powerful tool of connecting patients with the service in the era of COVID-19. Indeed, over 70% of cases came through this channel.

### COMPLAINT INSIGHT

Nature of complaint	2020-21	2019-20
Goods and services	36%	47%
Customer care	35%	29%
Product	14%	9%
Other	8%	9%
Charges	7%	6%

Key complaint insights and key trends for 2021 include:

- Complaints involving customer care issues remain consistent with the previous year. In empirical terms, the number of complaint referrals involving issues related to customer care have remained broadly consistent. Given the reduction in the number of complaints concerning goods and services, the percentage of complaints referred to the OCCS concerning customer care is statistically higher than in 2019-20. This does not represent an increase in the number of complaints of this nature. The decrease in the number of complaints concerning goods and services is likely to be linked to the reduced activity within the optical sector as a result of COVID restrictions across each of the four nations





- Complaints arising from a breakdown in communication illustrate that the restrictions and COVID-secure measures do appear to have an impact on our ability to interact at a person level. This continues to particularly affect complaints relating to products (rather than care) as the opportunities to address dissatisfaction have been hampered by practice restrictions in the early phase of the pandemic and then social distancing/ COVID-secure measures in place since summer 2020. COVID-19 restrictions meant it was harder for consumers to raise dissatisfaction or queries informally ('in conversation') at an early stage. It was also harder for practices to identify potential dissatisfaction or issues in the pre-complaint stage, and to then resolve them swiftly at that early stage. The pandemic also impacted on the capacity within practice teams to respond to complaints and follow complaint processes. These factors combined are likely to have contributed to the earlier escalation of complaints to external agencies such as the OCCS, compared to pre-pandemic consumer behaviour.







# Adjusting to the ‘New Normal’


It became immediately apparent from 23 March 2020, that the consumer/practice relationship would come under pressure as a consequence of the public health measures necessary in a pandemic situation.

The OCCS has drawn on experience and strategies effectively deployed in previous years around communication and consumer expectations to ensure mediations met the needs of the parties involved in the complaints received. The team has also reached out to the sector to work collaboratively to ensure the OCCS are informed and aware of the sector’s response to the fast paced and developing situation during the past year.

Within the report we are highlighting analysis where the complaint trend appears to be directly linked to the pandemic, namely:

- OCCS enquiry volumes
- Mediation outcomes
- Nature of complaints

## ACTIVITY LEVELS



Though the overall number of OCCS referrals fell by 12% (YoY), it is estimated that optical eye healthcare activity fell more significantly during the same period. Using one indicative marker, the NHS GOS activity data from NHS England (2020-21)<sup>1</sup>:

- In April to June, the number of eye examinations/sight tests conducted was less than 10% of 2019-20 levels
- While activity did start to increase in Q2 (July - September 2020), it remained lower than previous years
- In Q4, activity levels dipped once again as four nations introduced various restrictions and ‘lockdowns’
- As can be seen in figures 2 and 3, OCCS activity has reflected the sector activity, with the expected timeline between consumer/practice interaction and complaint processes.

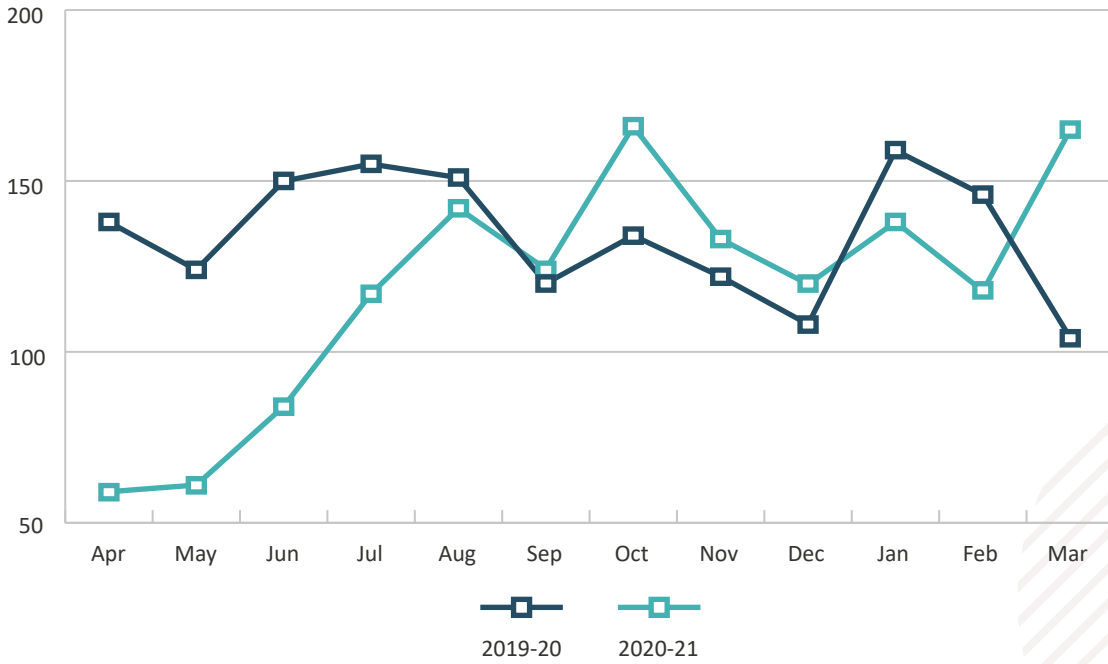
Overall, across the year, data analysis indicates the number of complaint referrals represents a 20% increase in activity when taking into account the number of eye examinations and optical products dispenses across the UK.

---

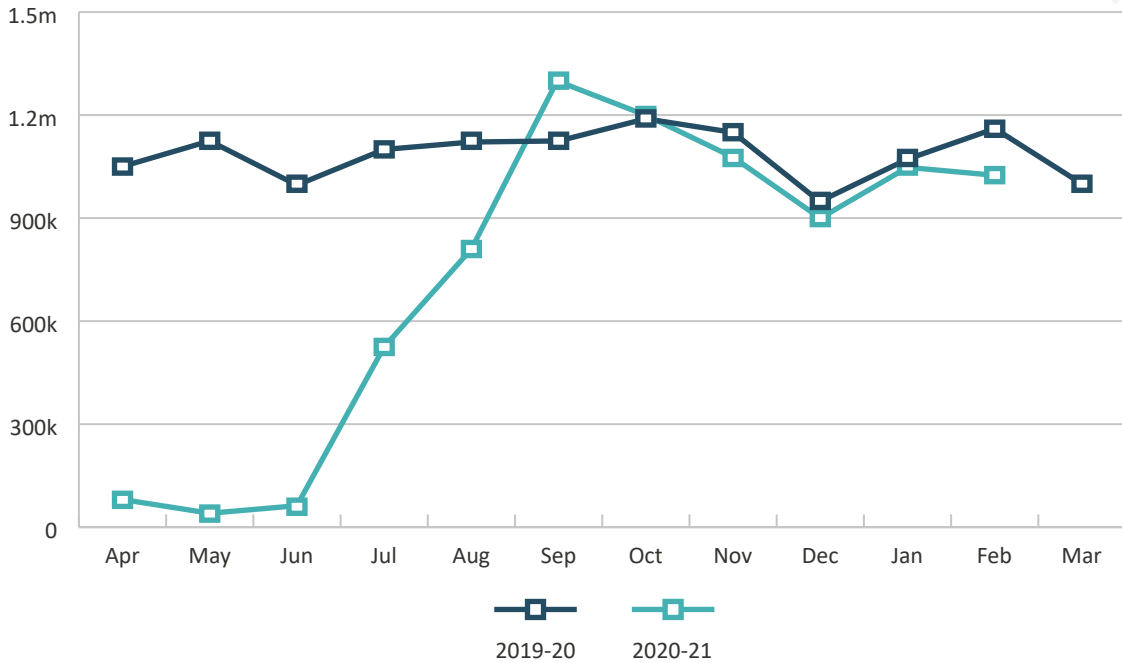
<sup>1</sup> The Optometric Fees Negotiating Committee (OFNC): <https://www.fodo.com/news-and-views/more/29203/page/2/nhs-england-rejects-support-proposal-for-struggling-practices/>



**Fig. 2: OCCS Monthly Enquiries**



**Fig. 3: Estimated GOS1 Data <sup>1</sup>**



<sup>1</sup> The Optometric Fees Negotiating Committee (OFNC): <https://www.fodo.com/news-and-views/more/29203/page/2/nhs-england-rejects-support-proposal-for-struggling-practices/>

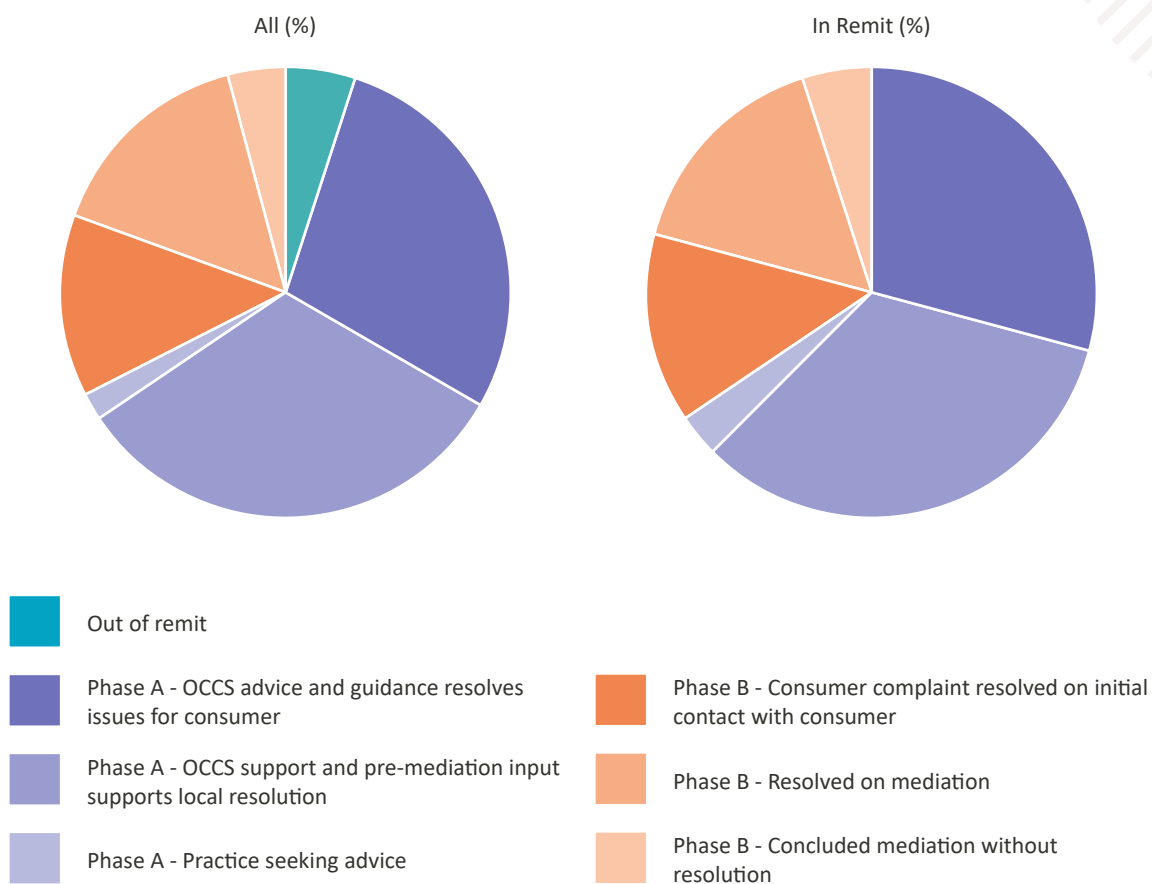




## COMPLAINT RESOLUTION

Mediation remains a highly effective method of ADR, with over 91% of enquiries receiving mediation input or receiving full OCCS mediation and progressing through to resolution. While the complexity of the complaint issues has been broadly the same, the parties involved in complaints have appeared to be more entrenched and emotive. The impact of external factors has also exacerbated the level of conflict and mistrust. The resolution rate remains strong in the circumstances, and aligned with the experience in other sectors. There has been more focus placed on the preliminary stages of the OCCS mediation process. This includes the complaint referrals where the OCCS resolves the complaint through advice, or uses mediation techniques to de-escalate the complaint and support local resolution within the practice. By doing this, it is possible to resolve complaints prior to engaging the formal mediation process. The outcome data reveals that 36% of complaints in 2020-21 were resolved in the advice stage, which is a 7% increase on the previous year. This has provided parties with swifter resolutions, which has been beneficial for all involved. This is also indicative of earlier escalation where consumers may not have been able to discuss their complaint with the practice in the usual way, and therefore sought external input at any earlier stage.

**Fig. 4: Outcomes**





## COMPLAINT INSIGHT

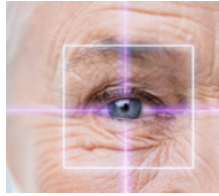
### Nature of Complaint



Error with prescription



Dispensing



Outcome of laser eye surgery



Dispense of varifocal



Concerns with the examination



Missed diagnosis



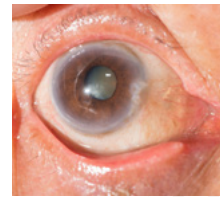
Prescription prescribed in one practice and dispensed in another



Reglaze - issue with consumer's own frame



Unknown



Cataract

Full analysis of the complaint circumstances can be found at the Complaint Insight chapter.

During 2020-21, the OCCS has seen slight variance in complaint circumstances which is to be expected when activity in the sector has differed from pre-COVID eye healthcare. Complaints where the consumer felt dissatisfied with the eye examination itself (81 to 85) or concerned about the prescription supplied and tolerance of the associated dispense (33 to 39) increased slightly year-on-year. Miscellaneous concerns about the eye examination appointment also increased. Anecdotal insight from the mediation of these complaints reveals implementation of, and communication regarding COVID-secure measures were contributing or aggravating factors.

The OCCS has observed a year-on-year decrease of 13% in complaints involving diagnosis and management of clinical conditions largely in line with reduced activity in the sector in 20/21. Having reviewed these complaints, the OCCS can report that these continue to be largely communication and clinical counselling issues.

Though the OCCS continues to effectively resolve disputes, it is crucial to recognise the need to constantly evolve this service and to remain agile, adapting to a very different landscape to the one that Nockolds first encountered back in 2014.

Specifically, to meet the emerging needs of the optical sector, the OCCS must:

- Recognise a shift in patient attitudes following the COVID-19 pandemic
- Respond to the ever-increasing pace of development surrounding treatments and practice diagnostic capability





- Handle new and novel disputes which are emerging from the fractured relationship between practices and patients in the age of social distancing
- Better understand the ways that the service can align itself to disputes which surround new technologies and online health care

Ultimately, it is crucial that the OCCS remains ahead of the latest developments and changes in both technology and patient behaviour if it is to remain a valuable resource for both patients and opticians. To do this, the service must commit to:

- Serving patients and practices by being an earlier indicator of potential concerns
- Recognising areas where professionals and patients may be facing challenges and conflict, and identifying the best way of educating and equipping the profession to solve these challenges

The OCCS is committed to continuing its work in the sector, delivering an effective and efficient mediation service in an environment which remains deeply affected by the COVID-19 pandemic. Responding to the commercial implications of a world which keeps practices and patients at a distance, the OCCS will ensure that it continues to perform in a highly sensitive and responsive fashion.





# Objectives and Ambitions

To date, the OCCS has committed to fulfilling the following 2020-21 objectives:

Sharing insight and analysis from OCCS activity to date, including activity with education establishments to reach out to optical students	
Continued to support the GOC strategy for managing FtP to ensure that PSA objectives are delivered	
Continued to examine and consider ways of working that will support increased sensitivity and specificity of the FtP process	
Develop collaborative working models across healthcare regulators around complaint management and to promote the GOC in this arena.	

The detailed objectives for the OCCS for 2020-2023/4 are set out in Appendix 3. These continue to be progressed as part of the overall OCCS strategic plan.

The 2021-22 OCCS strategic objectives are:

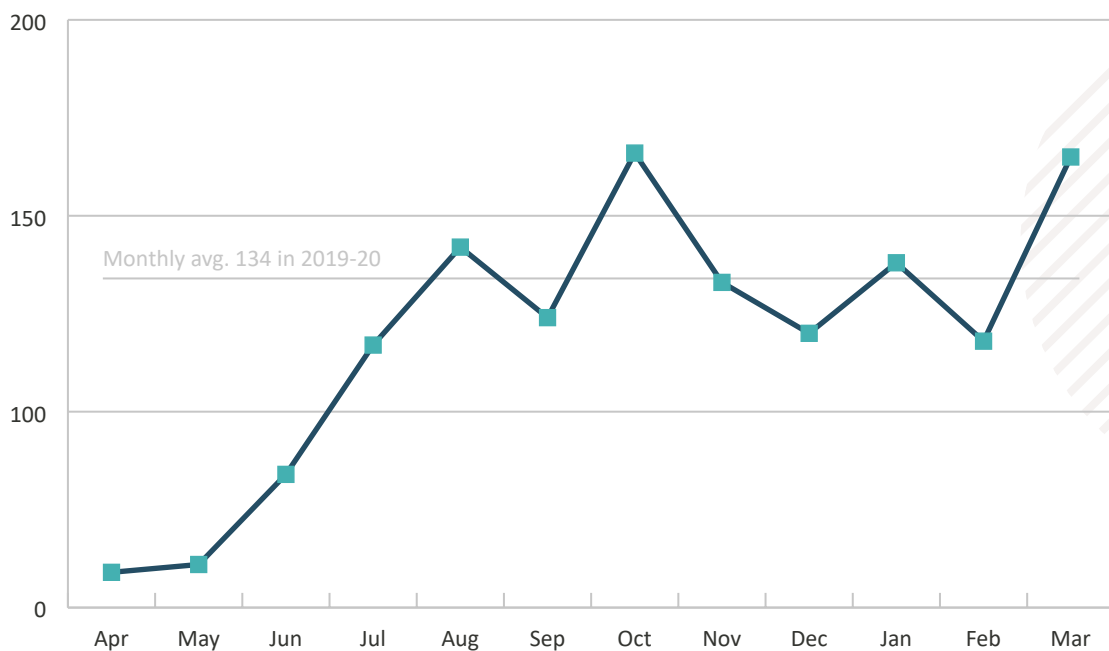
1. To support GOC strategy for effective and timely progression of fitness to practise cases to secure PSA objectives through:
  - Effective low level complaint resolution
  - Continuing to pro-actively develop ways of working that will support increased specificity and sensitivity within the FtP process.
2. Share insights and analysis from OCCS activity to support a culture of continuous improvement
3. Supporting the professions to managing the long-term impact of the pandemic on practice and consumer relationships.



# OCCS Overview

Meaningful forecasts for the 2020-21 period were harder to project due to the ongoing COVID-19 pandemic and the associated public health concerns and restrictions. Indeed, in our previous annual report, we explained that we were yet to see the impacts of the pandemic on the sector and the OCCS service.

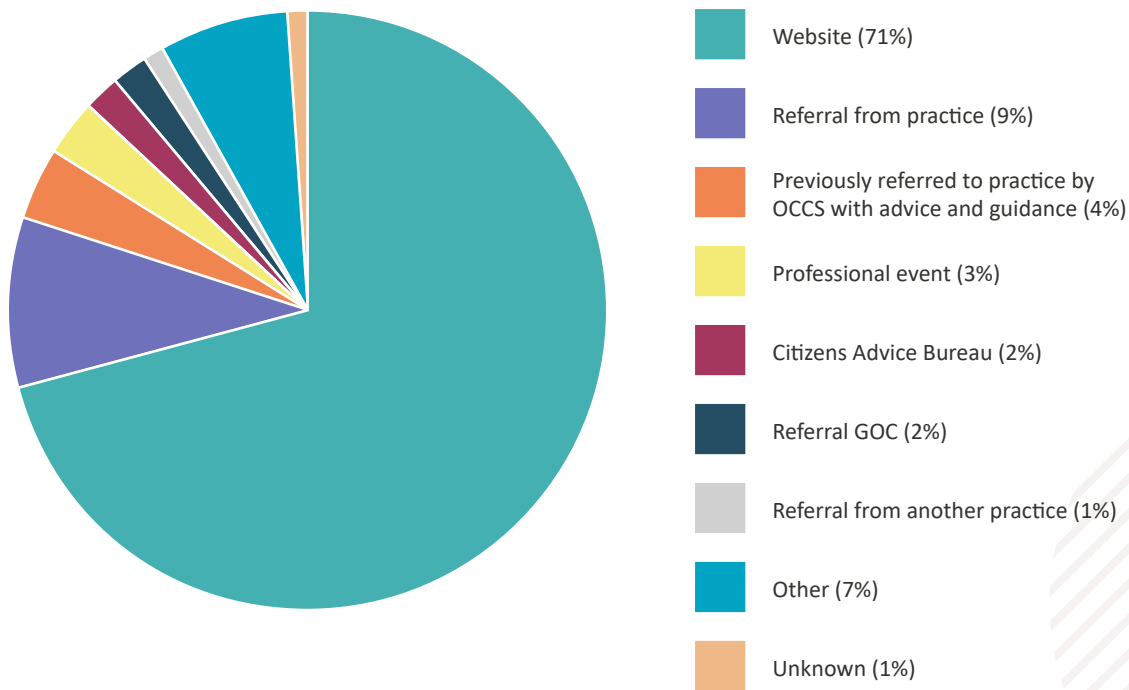
**Fig. 5: Number of Complaints**



The OCCS received 1,411 enquiries in 2020-21, compared to 1,611 in 2019-20 representing a 12.4% decrease. Enquiries in April and May 2020 fell dramatically, but as explained at page 10, this reflected reduction in optical activity as restrictions meant only essential or emergency care could be delivered. From July onwards, however, the OCCS received more complaints than in 2019-20, totalling 1,171 against the 1,048 of the previous year. Segmenting the data in this way makes it possible to see just how much of an impact the first few months of lockdown had on the service and the optical sector more broadly.



**Fig. 6: How Do Consumers Find the OCCS?**



▶ Referrals by the GOC to the OCCS account for 2% of incoming activity. While this appears to be a lower proportion than in 2019-20, it represents around 15% of enquiries to the GOC. The OCCS and the GOC FtP team continue to work collaboratively to ensure low level complaints are given the opportunity to access mediation to explore resolution beneficial for both parties and the regulator, compared with a disproportionate FtP investigative process. During 2020-21, the OCCS understands that peer-to-peer referrals to the GOC increased as a proportion of enquiries received. These concerns fall outside the remit of the OCCS as they are not consumer complaints and therefore it is not possible to make a year-on-year comparison.

With access to professional events being considerably limited in 2020-21, it is perhaps no surprise that this channel dropped slightly when compared to 2019-20, whilst referrals which arrived at the OCCS via the website made up the largest proportion. Increasing by 5%, the greater visibility of the OCCS online has been driven by ongoing digital and social marketing campaigns.

**Conclusion Rate:** During 2020-21, the OCCS concluded **1,444** complaint interactions.

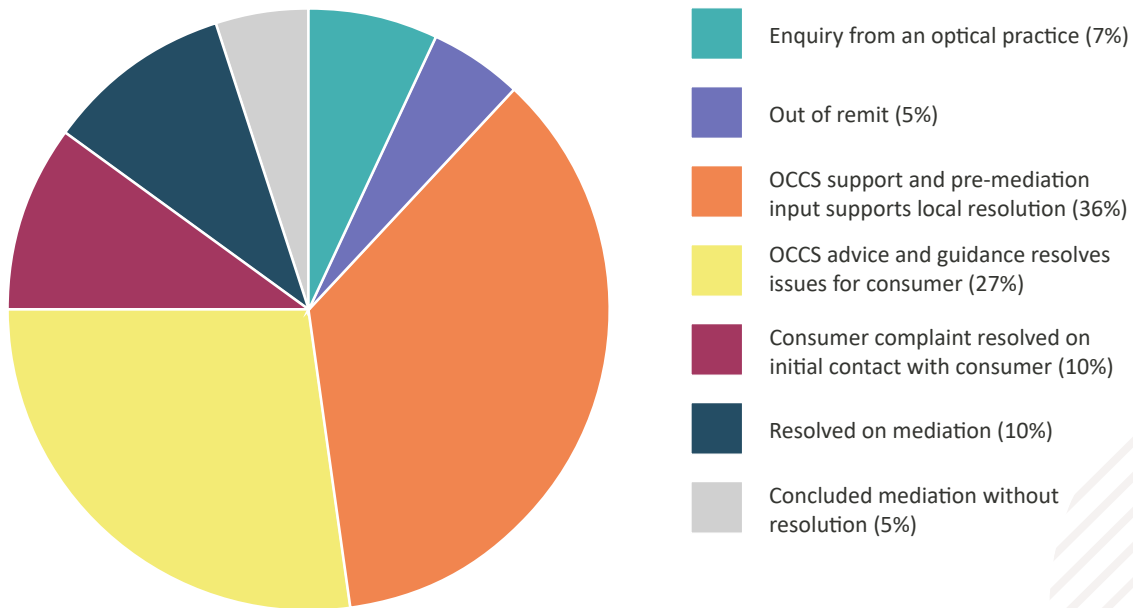
In **95%** of in remit enquiries, the OCCS input supports or achieves a resolution.





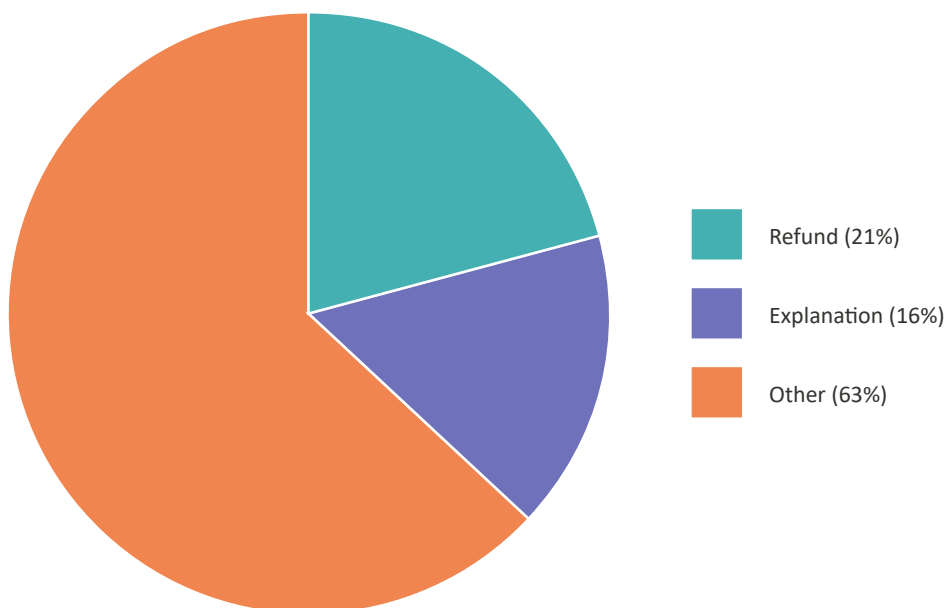


**Fig. 7: Outcome of all Enquiries (%)**



▶ Remaining consistent with 2020-21, the OCCS successfully handled 95% of all complaints received. Of those which were unable to be resolved through mediation, deeply entrenched positions, a drop in the willingness and affordability of goodwill gestures may explain the 2% variation in mediations concluding without a resolution in this year's outcomes (5%, compared to 3% in 2019-20).

**Fig. 8: What Do Resolutions Tell Us?**





## COMPLAINTS OUTSIDE OCCS REMIT

95% of enquiries related to consumer complaints, which is a 2% increase on 2019-20 and a 4% increase on 2018-19.

Of the 5% of enquiries falling outside the remit of the OCCS:

- **Fitness to practise referrals by OCCS to GOC - 5**

Complaints in this category involve allegations or concerns which may potentially amount to a fitness to practice impairment. The referrals from the OCCS to the GOC FtP process have fallen from seven to five, which equates to just 0.2% of the enquiries concluded in 2020-21.

From analysis of the referrals made, and those enquiries mediated by the OCCS, this reduction is attributed to the implementation of Acceptance Criteria and the remodelling of the FtP triage stage. The direct interactions between the OCCS and FtP teams have further developed the funnelling of enquiries into the appropriate complaint resolution process.

- **No GOC registrant identified within the complaint circumstances or consumer interaction - 29**

The practice involved in the complaint was not a GOC registrant and no individual GOC registrant involved in the optical product supplied, so not within the OCCS remit (29). This year has seen a decrease in the number of enquiries signposted to Trading Standards or Citizens Advice Bureau because no GOC registrant (individual or body corporate) could be identified within the consumer's interaction with the optical business. The OCCS will look to identify a GOC registrant involvement, and to gain engagement by the practice and the registrant.

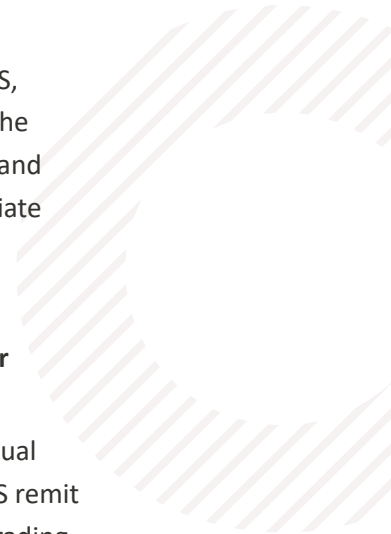
- **Compensation claims - 11**

Concerns where the consumer felt harm had been caused, and therefore fell outside the OCCS remit and consumers would need to seek independent legal advice.

- **Other**

The 'other' category represents complaints relating to:

- » Data protection issues
- » Complaints relating to hearing care provided by optical businesses
- » Enquiries from outside UK
- » Inter-practice complaints
- » Employee issues
- » Practices ceasing to trade and consumers seeking registration details.





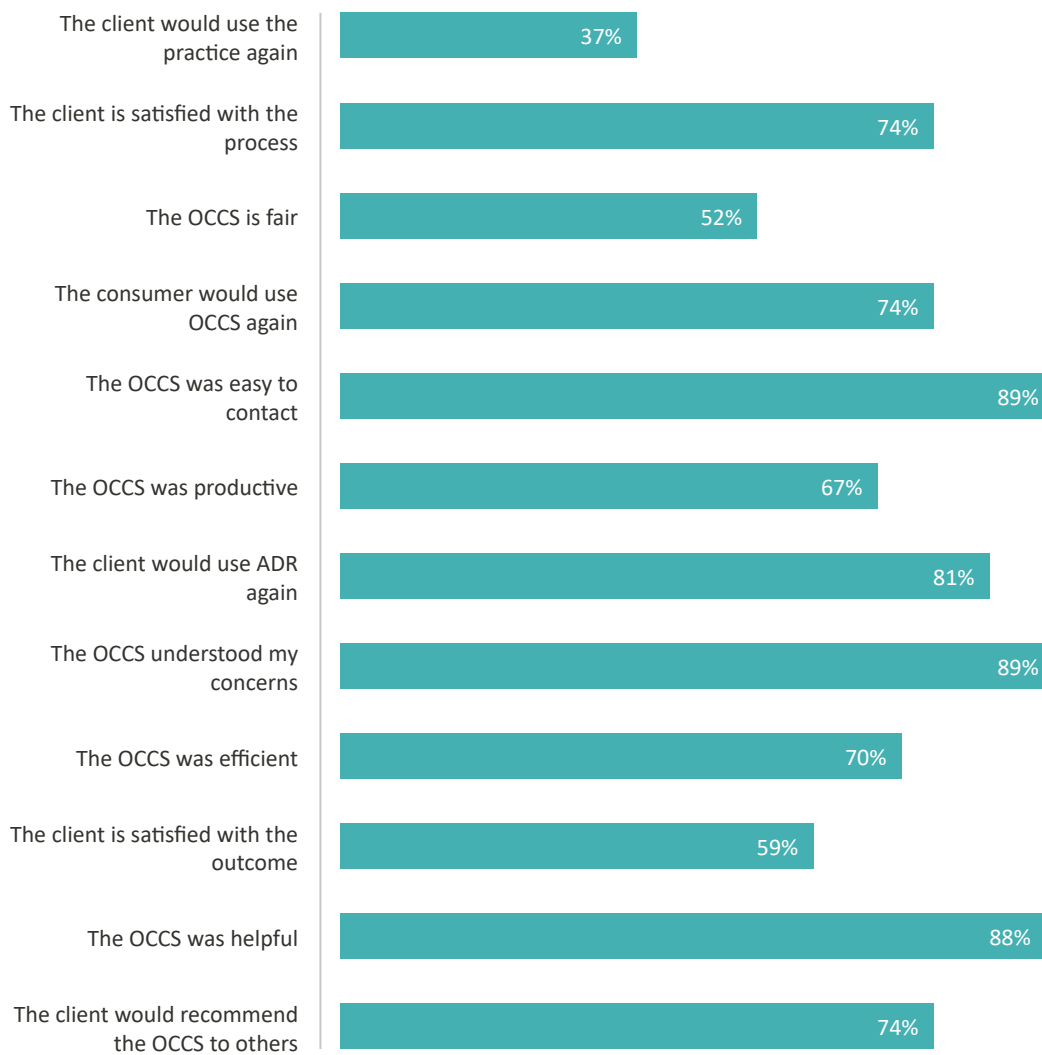
# Feedback

## FEEDBACK

The OCCS continues to request feedback from service users. The feedback captures accessibility, satisfaction and effort ratings. At present this is available at the conclusion of the OCCS interaction with the service user, via an online survey or in paper format.

All feedback responses are reviewed by the Mediation Services Manager and Head of Service. Any dissatisfaction is reviewed and where appropriate, discussed with the OCCS team.

Overall feedback is also shared with the OCCS team to celebrate success and to support the learning culture embedded within the OCCS. Conclusion and resolution rates are reviewed monthly on a service basis to ensure consistency.





In general, the feedback this year reflects slightly more dissatisfaction amongst service users than the responses gathered over 2019-20. As a year defined by ongoing frustrations across all industries and sectors, it seems likely that users were more disgruntled than they have been otherwise. In addition to this, it would appear that the decline in goodwill gestures has had an impact on the way that users regard the OCCS and the practices involved in the complaint. Altogether, many users have been significantly impacted by the COVID-19 crisis and will be experiencing a drastic change in their financial situation, employment status or domestic arrangements. Some people may be at risk or suffering from physical or mental health conditions, or have responsibility for caring for others who are unwell or vulnerable. This has created something of a perfect storm for instances of unusually critical feedback. It is important to note, however, that the number of users who found the OCCS helpful, that they understood user concerns, and were easy to reach, remains high and consistent with previous years.

In addition to quantitative feedback, service users also provide narrative feedback.

Examples of feedback received during 2020-21:

- ‘Without [the OCCS Resolution Manager’s] help in advising me what to do and mediating on my behalf this would still be unresolved and I cannot thank her enough’
- ‘The OCCS went as far as possible in the attempt to resolve my case’
- ‘I wish I had been aware of the help available before and would definitely recommend the OCCS to others’
- ‘[The] OCCS has succeeded where I spent seven months without success!’
- ‘Even though the outcome did not end in a refund, I felt that my views were being expressed to the opticians by professionals and that the outcome is a reflection of a very negative attitude of the company and their determination to avoid a refund’

Feedback from practice representatives and optical stakeholders was provided during the 2020-21 procurement process. Stakeholders gave testimonials on their experience of mediating complaints with the OCCS team, and the overall impact of the OCCS on the sector, benefiting consumers and registrants.

## TESTIMONIALS

‘We have been very satisfied with the outstanding support received by our customers and store partners while providing the OCCS service. We have found them easy to communicate with and very supportive towards our customers and store partners when reviewing and mediating customer complaints. They are able to achieve excellent results for our customers and partners through very delicate and challenging negotiations, being able to reach a resolution that is acceptable to both parties. [The feedback we received through mediations and insight] allows us to develop improvements to our customer service and customer care as we continually strive to improve these crucial areas.’

*- Executive Customer Care Manager, Multiple Optical Business*





‘Our annual face-to-face meeting allows us to further understand our complaint volume verses the industry, nature, specifics and current complaint trends. This enables us to proactively continually improve our customer service.’

- Executive Customer Care Manager, Multiple Optical Business

‘We have been very impressed with the way [the OCCS team has developed] their understanding of the sector and their management of complaints. They are an experienced team who are focused on resolving issues quickly and fairly whilst also identifying learning points from their work and sharing them with the sector. [Our] legal team has no hesitation in advising members to direct patients to them if a matter cannot be resolved at a practice level.’

- Optical stakeholder and indemnity insurer

### SERVICE COMPLAINTS

The OCCS has handled one concern regarding the OCCS process and approach raised by a practice in December 2020. The mediation was reviewed by the Head of OCCS and the Mediation Services Manager. The concerns were successfully resolved.

### EVALUATION OF FEEDBACK FOR 2020-23

The OCCS is introducing a more tailored customer feedback approach, which will vary the method and the content of feedback requests dependent on the nature of the service user interaction with the OCCS team:

Concluding without full mediation	Phone or email 2 phase	Impact focus <ul style="list-style-type: none"> <li>Resolving complaint at a local level</li> <li>Productive and accessible</li> </ul>
Concluding following mediation	Email link or hard copy	Impact on complaint <ul style="list-style-type: none"> <li>Accessibility</li> <li>Independence/impartiality</li> </ul>

Varied methods are planned to support service users in providing their feedback in the most convenient manner. Feedback requests without incentives have low feedback response rates and so 15% is seen as a strong response compared to other customer service benchmarking data. The OCCS is committed to obtaining feedback through direct requests and practice and stakeholder consultations. These are all combined to provide an overview of the impact of the OCCS and the effectiveness of the service in delivering excellent customer service.

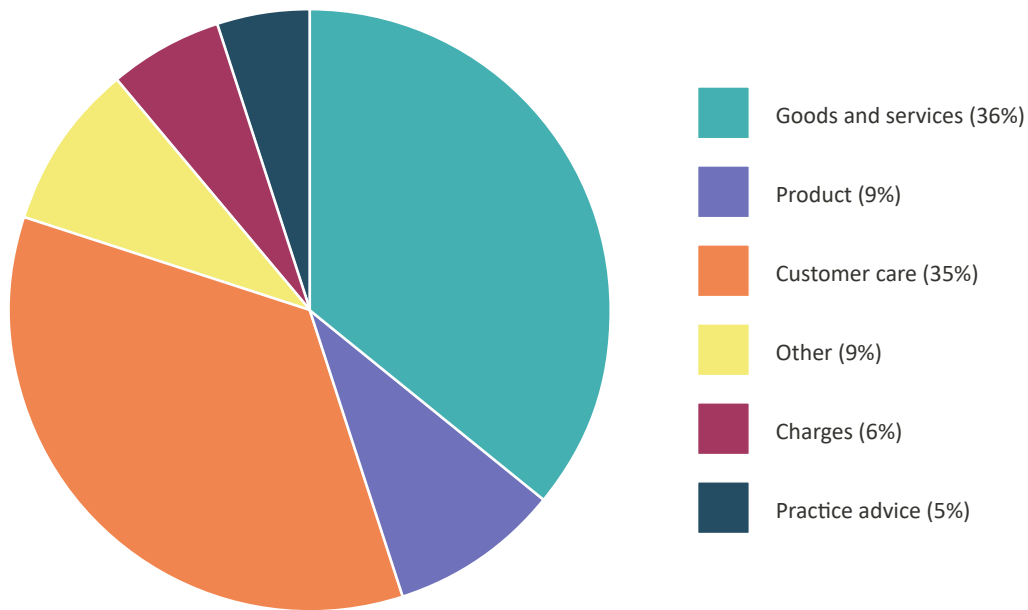
The OCCS has committed to continual evaluation and to develop initiatives to improve the accessibility of the OCCS for all consumers. Feedback from service users provides a mechanism to evaluate this activity. User feedback will also inform improvements to our process, the tone and language used in communication, and our ongoing objective of delivering a person-centred approach to complaint resolution.





# Complaint Insight

Fig. 9: What Do Consumers Complain About?



In order to provide a more contextual view of the complaint types and their distribution, the below table performs a comparison on 2019-20.

Complaint Type	Response 2020-21 (%)	Response 2019-20 (%)
Goods and services	36%	47%
Customer care	35%	29%
Product	9%	9%
Other	9%	9%
Charges	6%	6%
Practice advice	5%	





The five most common complaint issues as presented by the consumer, and referred to the OCCS in 2020-21

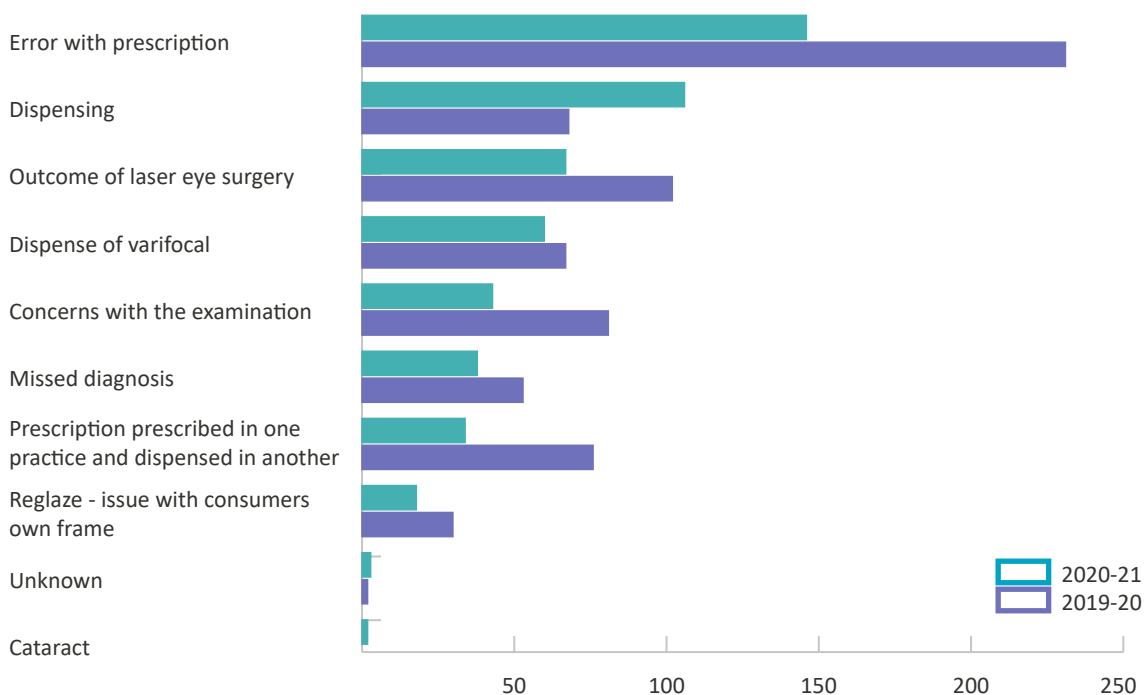
- Consumer complains the prescription issued was incorrect (147 compared with 231 in 2019-20)
- Dispensing (106 compared with 68 in 2019-20)
- Delay in supply (99 compared with 73 in 2019-20)
- Charges and offer (equal to 2019-20)
- Attitude (92 compared with 73 in 2019-20)

In terms of variance compared to complaints referred to the OCCS in 2019-20:

- Complaints relating to dispensing have increased by 3% to become the second most popular complaint type in 2020-21
- Complaints where the consumer complained about the outcome of laser eye surgery have remained fairly consistent, dropping by only 1% in 2020-21
- Though still below 100 complaints of this nature in a year, an increase of complaints relating to the attitude of staff have risen from 4% to 6% in 2020-21. This would cohere with other data which suggests that the pandemic and subsequent restrictions placed different pressures on practice/consumer interactions, consumer expectations and team resilience.

## COMPLAINTS RELATING TO SERVICES (CARE) PROVIDED

**Fig. 10: Goods and Services Complaints (YoY Comparison)**



## Prescription dispensed elsewhere

As identified in previous annual reports, the OCCS mediates complaints where the prescription issued by another practice is dispensed by another. In mediating complaints, the OCCS notes that awareness of the Optical Confederation guidance in this situation may have fallen within practices, and so the OCCS will feed this back to the sector and the Optical Confederation. In our last annual report, the OCCS anticipated that a more challenging economic climate would make it more likely that there would be an increase in situations where two practices may be involved and may be seeking the other to accept responsibility. Encouragingly, this was not the case and there was in fact a 2% decrease in these types of complaints in 2020-21. Consumers may have been less inclined to take a prescription from one practice to another as they sought to limit their interactions following COVID guidance.

## Consumer complaints involving diagnosis or management of a clinical condition

Condition	Refer to practice with advice	Out of remit	Advice only	Mediation successful/ unsuccessful	Still live	Total
Cataract	4		1	2/1		8
Glaucoma	1		2		1	4
Retinal detachment	1	4	2	1/2	1	11 (14)
ARMD	1			2/2		5 (12)
Misc.	7	4	1	2	4	18 (12)
<b>Total</b>						<b>46</b>

*Previous year figures in brackets*

The OCCS has seen a year-on-year decrease of 13% in complaints involving diagnosis and management of clinical conditions, largely in line with reduced activity in the sector in 2020-21.

Having reviewed these complaints, the OCCS we can see that these continue to be largely communication and clinical counselling issues. The table above provides further detail on the nature of the clinical conditions involved and also the outcomes of those enquiries we felt able to address within the remit of the OCCS. Where a complaint is clearly out of remit then we will advise accordingly and signpost consumers (six of the 11 retinal detachment concerns were clearly not within the OCCS remit).

The significant decline in ARMD issues is a particular concern as it may reflect a reduced volume of routine eye examinations in the elderly population during the pandemic, reinforcing the criticality of routine eye health care appointments.

The OCCS is focusing insight sharing and CET development on consumer/patient





communication around diagnosing and counselling of clinical findings. The increase in diagnosis related complaints supports the continuing focus in this area in 2020-21. In addition, these complaints are also seen in the group referred to the OCCS by the GOC, which is a further illustration of the current impact of Acceptance Criteria on complaint resolution. These complaints are then resolved through advice and guidance as well as full mediation. Early advice has included signposting to support services such as the Macular Society. Data also shows that all of these complaints have concluded with a resolution, further supporting the positive impact of Acceptance Criteria for consumers, GOC registrants.

### Consumer complaints relating to quality of the eye examination

During 2020-21, the OCCS has seen these complaints increasing slightly from 81 to 85. The increase in miscellaneous complaints in this category reflects the impact of implementing COVID-secure practice in healthcare, which create unfamiliar environments and ways of working placing pressure on both healthcare professionals and consumers.

Given the huge pressure the sector has been working under this outturn, especially the year-on-year reduction in complaints relating to quality of examination, it is a positive testament to the work the whole industry has undertaken to keep both its colleagues and patients safe during the pandemic.

Issue	Refer to practice	Out of remit	Advice only	Mediation successful/ unsuccessful	Live	Total
Rx/non tol	6			20/5	8	39 (33)
Quality of EE	3		3	4/1	1	12 (21)
Quality of advice	2	2		3/0		7 (6)
Diagnosis/ clinical	3	1	1			5 (14)
Misc.	3		3	3/2	1	12 (7)
<b>Total</b>						<b>85 (81)</b>

*Previous year figures in brackets*

### Refractive Surgery Complaints

The number of complaints relating to the outcome of refractive surgery is also down year-on-year, which is consistent with the reduction in volume of activity. Contact with the OCCS relating to complaint handling and also processing payments due to consumers did increase, which resulted in the overall complaint activity in this area of the sector remaining consistent with 2019-20.





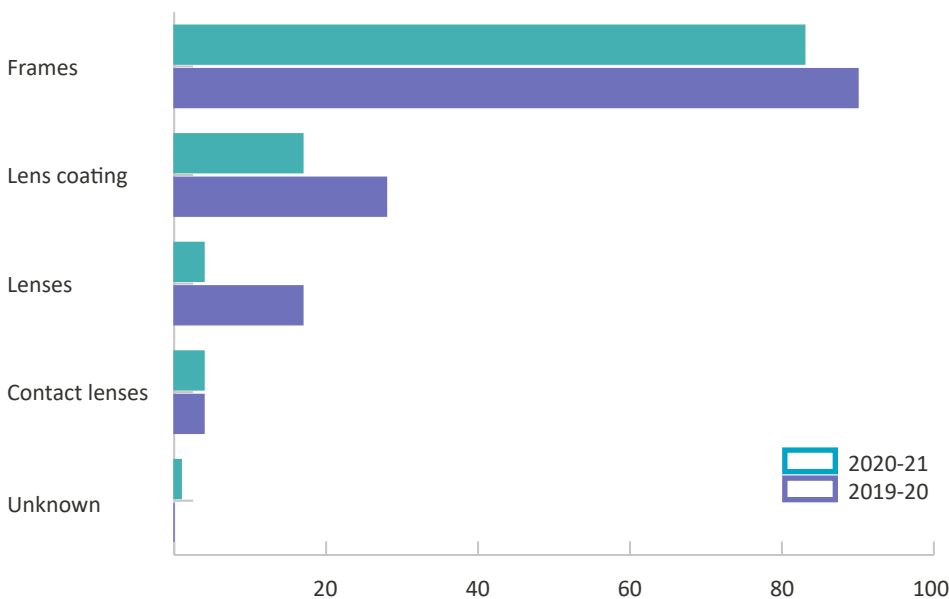
The consumer-related activity in this area was directly related to COVID-19 as operations in head office and finance teams were impacted in April/May 2020 lockdowns as providers were operating with reduced staffing and transitioning to remote working. The OCCS saw delays in deposit refunds during this period. This appeared to improve by the summer of 2020.

The insight from complaints relating to the outcome of laser surgery is aligned with previous years, and indicates these are related to expectations and application of terms and conditions. In the later half of 2020-21, mediated resolutions in these complaints increased following additional focus and input by the OCCS team, the providers and consumers.

The OCCS remains in dialogue with GOC registrants in this part of the sector to explore how this insight should inform future consumer care. The OCCS has adapted the mediation process for refractive surgery complaints, which has achieved effective resolutions. This approach is continually under review.

	Advice and RTP	Out of Remit	Unsuccessful mediation	Successful mediation	Live
Charges and refunds	11			7	
Outcome of surgery	29	4	8	17	3
Aftercare				2	1
Complaint management	10		1	4	
Attitudinal	3				1

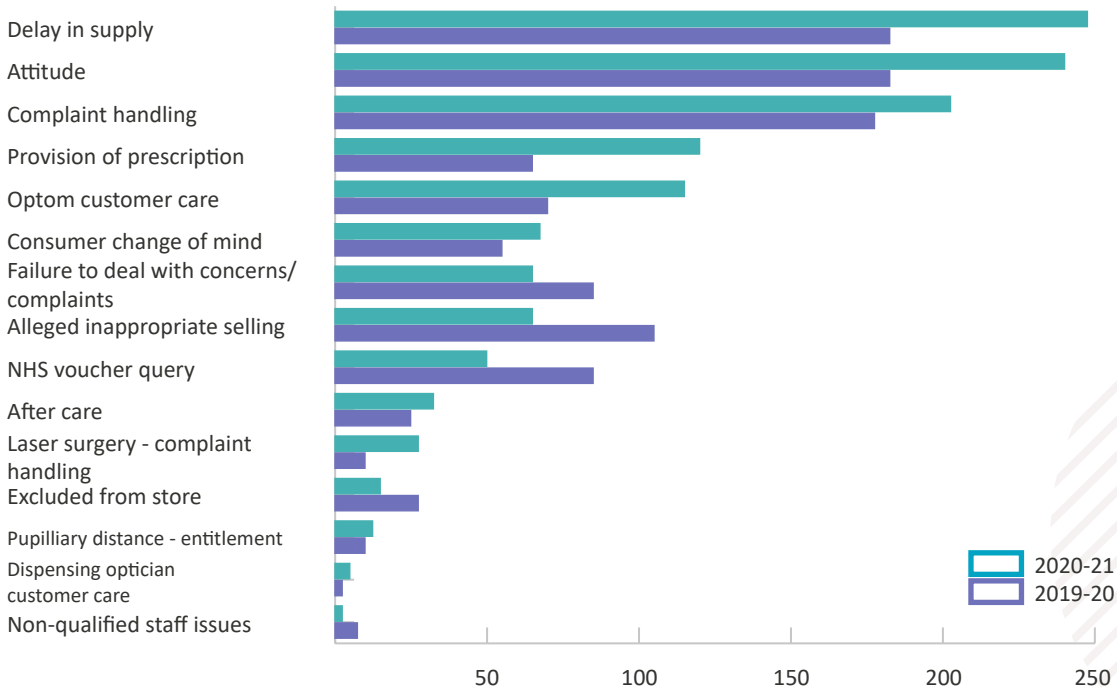
**Fig. 11: Product Related Complaints (YoY Comparison)**





## COMPLAINTS RELATING TO CUSTOMER CARE

**Fig. 12: Customer Care Complaints (YoY Comparison)**



### Consumer excluded from the practice

Last year, the OCCS reported an 83% increase in complaints where the consumer was excluded from the practice. In 2020-21, these complaints dropped by 55%. This is likely to be a reflection of decrease in routine appointments and interactions during the pandemic, either due to lockdowns or the reduced capacity of practices as they operated COVID-secure clinics. Though these are low in volume (5 and 11 respectively), the OCCS takes such complaints very seriously as they represent a much more significant form of conflict. These complaints involve emotive situations, where practices are seeking to protect their practice team and consumers will feel aggrieved.

The OCCS is analysing insight from these mediations. The desired outcome is a useful insight, and can be categorised as:

- The consumer seeking the disciplining of the practice owner or manager
- The consumer seeking to restore their relationship with the practice
- The consumer seeking compensation.

In this category, the OCCS saw the most significant increase in complaints involving:

- Delays in supply (directly related to operating restrictions in the early phase of the pandemic)





- Consumers unhappy with the attitude of practice staff (which is likely to be linked to societal pressures and team fatigue).

There was a reduction in the number of complaints relating to NHS vouchers and allegations of inappropriate selling. These changes are likely to be linked to lower number of routine interactions between consumers and practices.

The team can also pro-actively support the consumer in accessing support. If a consumer has been aggressive or threatening, the OCCS will reiterate the reasons why the practice has excluded them from the store, seek to gain a better understanding by the consumer of why this was necessary and bring the conflict to an end.

The OCCS will continue to offer communication and conflict resolution insight and training to enable escalating situations to be managed at a local level.

### **‘I cannot get on with my glasses’ - most common consumer complaints in optics**

When a consumer presents this complaint, the precise underlying issue within their complaint could be one of (or a combination of) a number of issues:

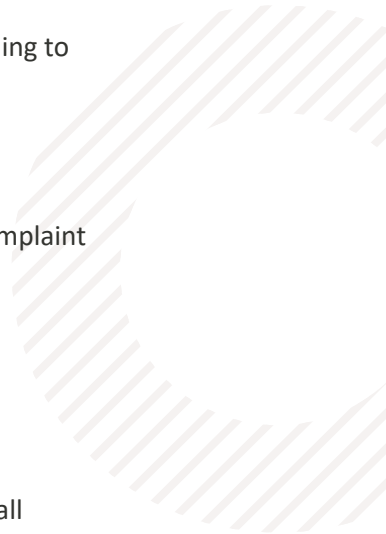
- The eye examination
- Accuracy or significant change in prescription; and
- The dispense of a product.

During 2020-21, the OCCS has seen these complaints fall in terms of the proportion of all complaints received (except complaints relating to varifocal dispensing which have increased overall), and in the context of fewer dispenses during this 12 month period.

The OCCS records the complaint based on the consumer’s presentation of the issues. This ‘categorisation’ may not reflect the actual reason behind why the consumer is struggling to use and wear their spectacles successfully. It does, however, reflect how consumers regard their complaints, assisting complaint insight analysis. The OCCS team reviews the complaint to assist the parties in identifying a resolution which will often unpick the complaint situation.

While the total number of complaints of this nature have fallen slightly in terms of percentages in 2020-21, it must be noted:

- There will have been fewer spectacles dispensed during 2020-21 given the period of lockdown and restrictions with limited practices to ‘essential’ eye care only, and even when restrictions have eased, COVID-secure practice is likely to reduce occupancy and the number of consumers a practice can assist over this period
- Fewer tolerance related complaints are received in the GOC FtP triage process. Complaints of this nature would be considered under the Acceptance Criteria, and therefore would now be directed to the OCCS mediation process, rather than entering FtP.





## COMPLAINTS RELATING TO A FEE

### Charges

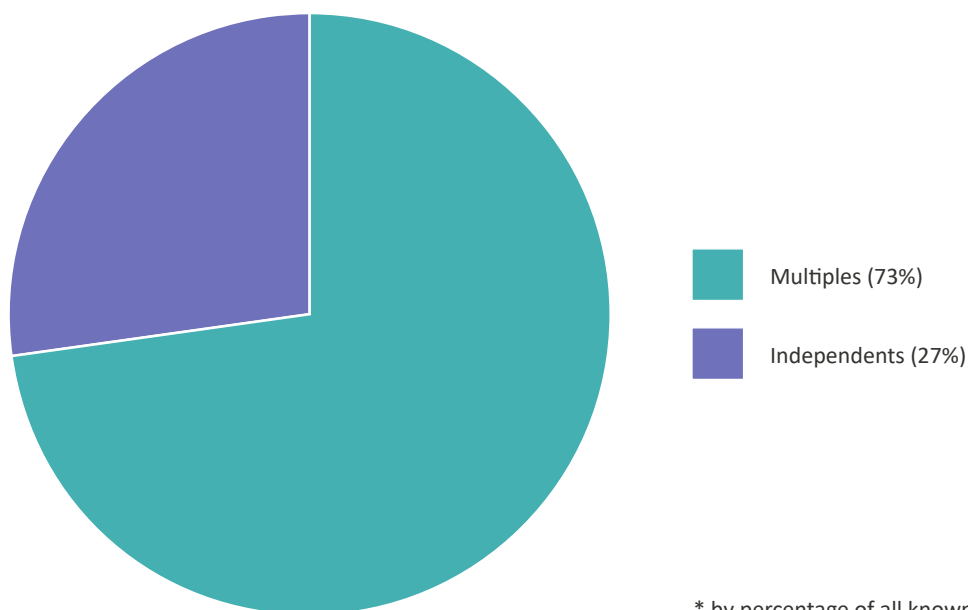
This year, complaints concerning fees and charges are listed in the most common concerns presented by consumers. Having analysed the mediations in this category:

- 5% were outside remit, either due to the consumer or practice being outside the UK or there being no GOC registrant involved (online supply)
- 95% were successfully resolved through mediation and advice, with the remaining 5% unresolved after mediation
- Complaints included issues with direct debits, charges in situations where the consumer would have expected the practice to provide a service free of charge (such as second opinion), relationship between NHS services and private purchases, and contact lens aftercare charges.

Some of these complaints may relate to more challenging economic situations, where consumers may be concerned about affordability and also where practices apply stricter policies or interpretations of consumer law, such as timescales for refunds or provision of some elements of their service which may previously have been included as a goodwill gesture. Communication is generally a factor in these complaints as the consumer is not expecting a charge at that level or conversations may be challenging. The OCCS anticipated last year that complaints relating to charges were likely to increase by a significant margin, however, the data shows that such complaints have only risen by a single percent in this time.

## WHO USES THE OCCS?

**Fig. 13: Enquiries and Complaints by Practice Type \***



\* by percentage of all known





In terms of practice ownership, complaints from each area of the sector have remained consistent with previous years. The OCCS did see a slightly higher proportion of complaints involving multiples in April-August, but then complaints relating to independent practices increased as a proportion in the autumn (October-December).

### **Consumers**

Nockolds Resolution captures EDI data and all consumer service users are asked to provide personal equality and diversity information.

The OCCS continues to request:

- Age
- Gender
- Marital status
- Sexual orientation
- Religion
- Ethnicity
- Disability
- Gender reassignment.

Response rates have increased by 13% during 2020-21, bringing the total percentage of respondents to 54%. This rise is encouraging as it allows the OCCS to form a better impression of its users whilst at the same time making progress towards the broader consumer analysis the service is committed to providing by 2023.

Indeed, as part of the 2020-23 objectives, the OCCS is seeking to refine the consumer EDI analysis. While the responses suggest the OCCS service users' demographics are consistent with general population figures, it is likely that the optical consumer population demographics differ from the general population. The OCCS will reach out to the optical sector to gather further data and insight from consumer EDI data capture at practice level. This is important in assessing the accessibility and awareness of the OCCS in all consumer groups. This was not progressed in 2020-21 as the sector understandably had to focus on the immediate needs of operating during the pandemic. This will be progressed during 2021-22.

Full details of the EDI data analysis is available at Appendix 2.





## GEOGRAPHICAL ANALYSIS

When looking at the total number of respondents who disclosed their location, it is possible to observe that, geographically, complaints are distributed in the following way:

### Northern Ireland

% of enquiries: 1%  
Population as % of UK total: 1.8%  
Variance: -0.8

### Wales

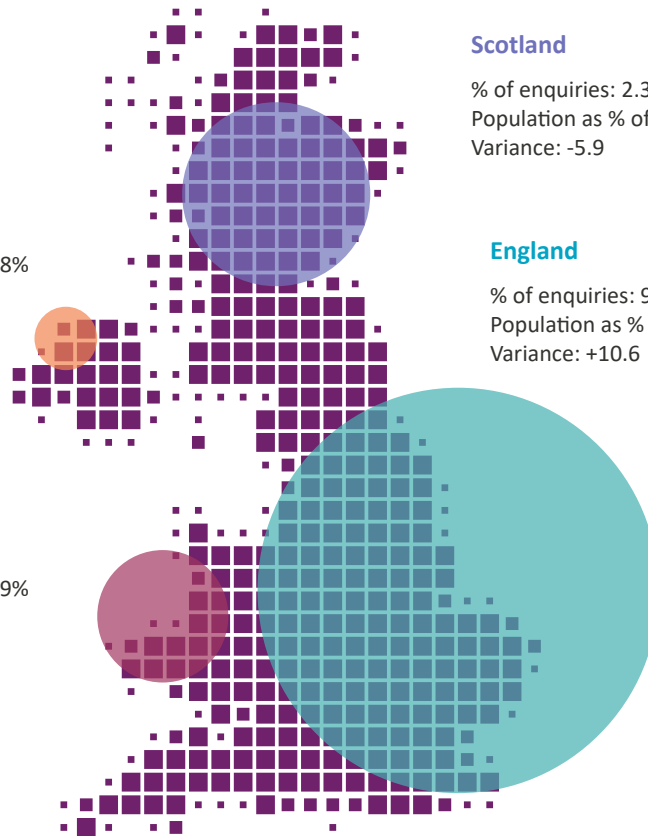
% of enquiries: 1.8%  
Population as % of UK total: 3.9%  
Variance: -2

### Scotland

% of enquiries: 2.3%  
Population as % of UK total: 8.2%  
Variance: -5.9

### England

% of enquiries: 94.9%  
Population as % of UK total: 84.3%  
Variance: +10.6



Of course, because this information is provided by choice and does not represent all of the complaints received in 2020-21, it would not be meaningful to draw broad conclusions from these statistics. It is, however, worth noting that the data remains consistent with the previous year, with fluctuations in the regions being within a few percent in each instance.

The OCCS will continue with engagement activity across all four nations, both remotely and where possible in person.

Introduced in last year's report, the OCCS now seeks to better understand and analyse the resolution which is reached in mediations.

\* Other resolutions include: future discounts, replacement products, further examination and consultation, goodwill product or future care, refunded NHS vouchers for refractive or cataract surgery related complaints, and further treatment or enhancements as part of the after care.





## INSIGHT ON FUTURE AWARENESS

An increasingly informed and expectant population will drive up the expectations in all clinical professionals. When that profession operates in a private and commercial landscape, and at a time of economic turbulence, we should expect increased challenge across all categories over the coming years. Last year, the OCCS discussed in detail the rising expectations around maculopathy and those present agreed that it would be wise to remain vigilant to this challenge. We are delighted to report that the OCCS, along with the Macular Society and Birmingham Optical, have been able to play a vital role in creating new CET content in this area.

As professional roles evolve we should also be cognisant of the potential for local enhanced services to bring increased activity. To date, we are delighted to report that we have seen very little activity in this area. The OCCS anticipates a increase in consumer complaints arising from postponed attendances during the pandemic. This may take the form of 'returned' products where contractual refund/return periods have passed (and consumers are deemed to have accepted the product). There may also be clinical issues where communication around referrals or secondary care criteria, diagnosis or management and progression may lead to disputes between practices and consumers.

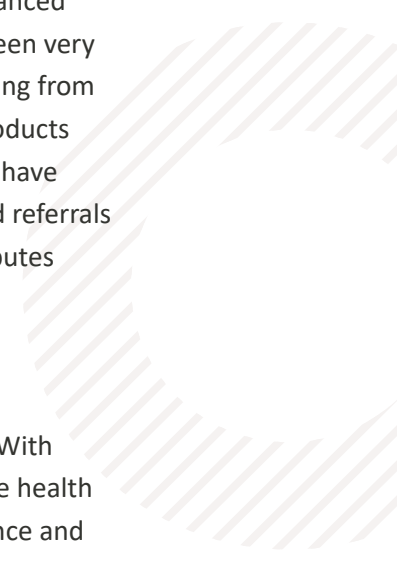
## COVID-19

In March 2020, the COVID-19 pandemic suspended 'business as usual' across the UK. With government lockdown restrictions in place, practices were able to offer emergency eye health care only. The OCCS team remained fully updated on the GOC and wider sector guidance and lockdown measures. In reaching out to stakeholders and representative bodies, the OCCS was able to keep channels of communication open with practices and customer service teams in the multiples across 2020-21. During the OCCS year, the team sensitively handled and resolved a low number of COVID related complaints. In the early phase of the pandemic related to the collection of orders and contact lens checks. These were resolved with early engagement with the practice and a solution focused approach.

As the pandemic continues to have an impact beyond 2020-21, the OCCS will:

- Continue dialogue with the sector
- Approach complaint mediation with sensitivity and awareness of the challenges faced by practices and consumers
- Keep updated and continue to contribute to the consultations informing GOC guidance; and
- Provide consumer facing communications which help consumers to navigate and work collaboratively to support practices.

The OCCS will continue to report to the GOC FtP team and GOC Senior Leadership Team to share insight on the impact of the virus, any further lockdowns and complaint trends which arise in the coming months and indeed coming years.







# Impact of the OCCS

## PROPORTIONATE COMPLAINT RESOLUTION

### The OCCS and FtP

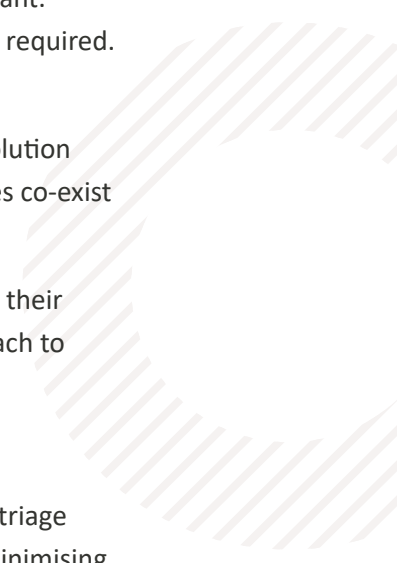
Public protection must sit at the forefront of complaint resolution and processes followed by the OCCS. As a direct access service, the OCCS can receive enquiries from consumers which involve matters which if proven, amount to an impairment to practise of a GOC registrant. There may also be circumstances where safeguarding of an individual, or the public, is required. In 2020-21, these circumstances accounted for less than 1% of OCCS enquiries.

The fundamental purpose of the OCCS is to provide a proportionate and effective resolution process for concerns which do not amount to allegations of impaired FtP. The two roles co-exist and complement one another.

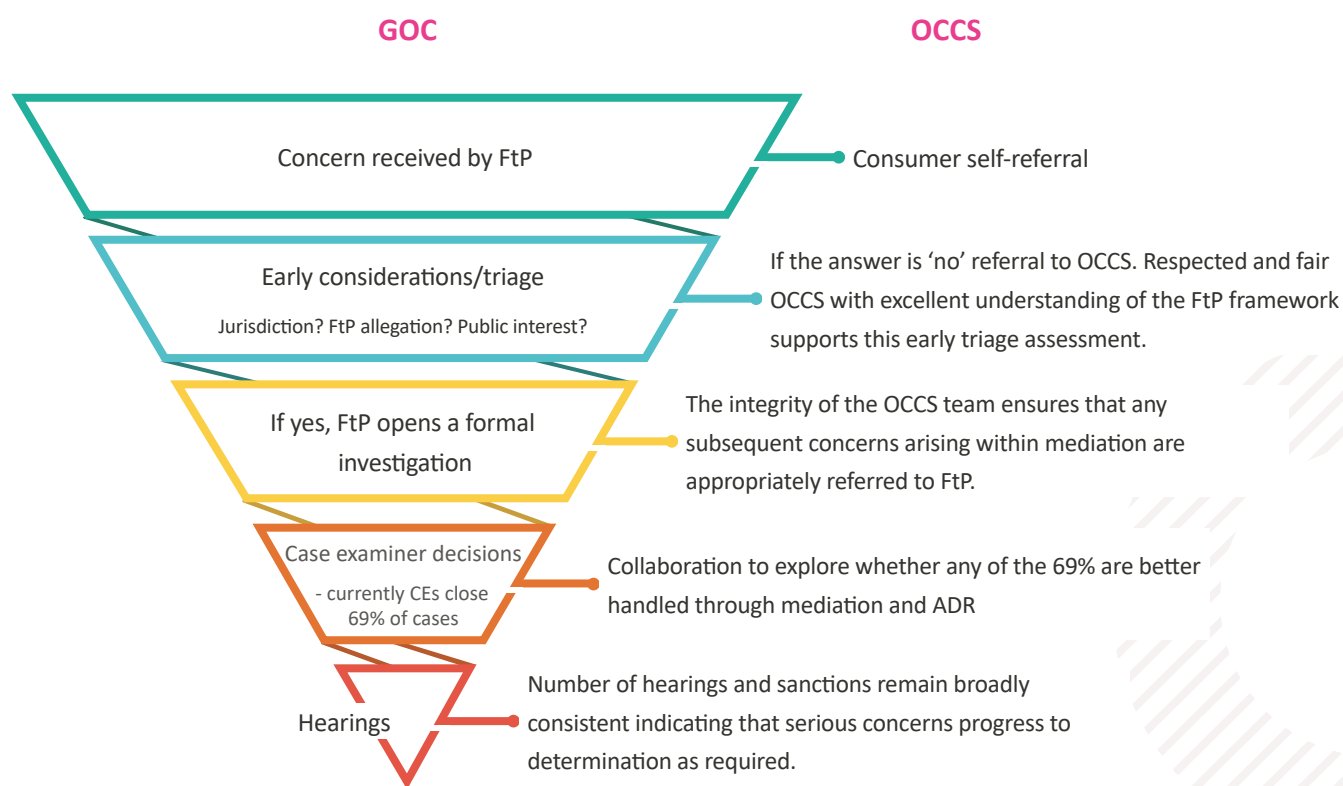
In recent years, the OCCS has also worked collaboratively with the GOC FtP to support their clear objective to remodel FtP triage process to provide an effective and timely approach to managing FtP concerns.

The OCCS input has been focused in three areas:

- Raising awareness and accessibility of the OCCS so consumers are able to self-triage their complaint, and refer consumer issues to the OCCS in the first instance, minimising unnecessary enquiries referred to the GOC
- Developing strong relationships with the FtP triage team to support the implementation of Acceptance Criteria within the initial assessment of concerns received by the GOC
- Supporting the application of Acceptance Criteria within the opened FtP investigation as part of the remodelling of FtP, to enable the OCCS role in complaint resolution for concerns which do not progress to committee hearings.



The current and potential future role of the OCCS in supporting the GOC in managing FtP concerns is illustrated in the 'FtP Funnel':



In 2020-21, this work has been delivered through:

- Team-to-team meetings and interactions which have:
  - » Improved joint confidence and reciprocal understanding of risk and harm analysis
  - » Identified the importance of 'desired outcome' as a factor in assessing complaints
  - » Reinforced proportionality focus
- Collaborative case reviews and evaluation to agree appropriate pathways for complaints and to pressure test and develop a consistent, fair process

With adequate safeguarding to ensure concerns enter the FtP funnel where in the public interest and necessary, an increased use of a more proportionate resolution and a nimble learning focused process in the OCCS is to be welcomed by consumers, registrants, stakeholders, defence bodies, the GOC and wider society.

Inappropriate referrals into FtP impacts on FtP case progression timescales in concerns involving the most serious of allegations. They also unreasonably raise the expectation of complainants and place the GOC registrant under significant distress which can be detrimental to their mental health, wellbeing and on occasions, safety.



Should the team identify a potential FtP or safeguarding concerns, the complaint is referred to the Head of Service and a Clinical Advisor for review. Where the circumstances could potentially involve an allegation of impaired fitness to practise, the OCCS will consult the GOC FtP team and seek input.

Referrals are then recorded and monitored in a live data report, known as the 'GOC-OCCS Referral Tracker'.

## ILLEGAL PRACTICE

The OCCS has provided information and details to the illegal practice team at the GOC during 2020-21. These reports have resulted in communication with:

- Individuals who were alleged to be illegally using the title of, or holding themselves out to be a dispensing optician
- The use of 'optician' by a business not registered as a body corporate.

This important work also supports consumer understanding of the difference between a GOC registrant and a provider who opts to remain unregistered. Research shows consumer awareness of the importance of regulation in eyecare and services and distinction between those regulated/unregulated is low. Action to prevent illegal practise affirms the importance and value of the regulated status of the profession and the protection it affords to the public.

## WORKING TOGETHER – THE GOC AND OCCS

The OCCS and GOC continue to work together in accordance with the Working Together policy reviewed in 2020.

Further examples of OCCS contribution to GOC strategic objectives:

- Reflective practice review
- Education strategic review
- Presenting a tri-organisation session to the GOC expert advisory group with the FtP team and AOP legal team
- COVID-19 guidance.





# Upstreaming

## SHARING THE LEARNING FROM COMPLAINT INSIGHT

- **Optical Professionals**

During 2020-21, the OCCS continued its commitment to upstreaming key insights from complaints back to the profession. OCCS communications focus on learning from complaints to improve consumer experience, particularly around communication, empathy and complaint triggers. It has also become clear that many GOC registrants do not fully appreciate the distinction between different levels of complaints. This has informed much of our work in the CET arena in recent years.

2020-21 presented challenges in this area with many CET events cancelled. Despite the reduction in the number of sessions, we have been able to deliver from almost 50 to just 10, we have been able to sustain a high penetration of our CET due to much larger audiences for some of our remote sessions peaking at almost 500 delegates for a session on maculopathy management reinforcing the potency of our partnership with The Macular Society. This session featured our first innovative use of macula patient audio clips describing their emotions regarding their eye examination to emphasise the criticality of the impact of effective consulting room interactions.

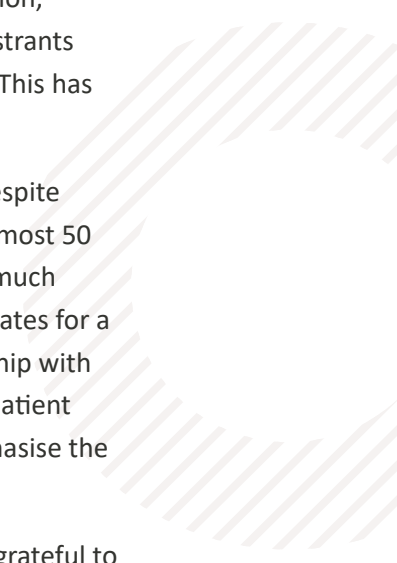
We have adopted and adapted our content to various online formats and are grateful to the partners who have enabled us to continue this work over the past 12 months, and also the GOC CET team for their support and advice as we navigated the choppy waters of shifting to online CET.

Interest in live OCCS CET events has not diminished, and we are seeing strong demand for events in 2021 as lockdown measures gradually ease. Altogether, the OCCS remains fully committed to live interaction as the organisation regards it as being the most effective form of learning for our material.

The OCCS continues to work to support the sector to provide a clearer understanding of complaint and regulatory risk, and we use our CET platform to reinforce the evolving nature of FtP and the GOC approach to complaints.

Wider insight activity for the OCCS continued at pace with both an active social media, contributions to professional media publications and the continuation of the 'sold out' CET sessions delivered virtually.

At the start of the year, the messaging on this channel focused on the activities of the OCCS (events/CET training and service) whilst touching on the pandemic. As the





pandemic began to develop, the messaging moved towards sharing regulatory and governmental guidelines to ensure that followers were kept up-to-date with the latest developments. In a rapidly changing situation, the OCCS' Facebook and Twitter accounts were able to sensitively navigate the changes whilst maintaining a consistent and easy-to-understand approach.

Through the pandemic, other areas that were focused on for content included:

- » Clinical matters
- » General advice relating to the 'new normal'
- » The remit of the OCCS

all whilst drawing attention to wider causes within the optical industry such as AMD, the effect of hypertension on vision, and the impact of increased screen time.

A clear message as to the remit and purpose of the OCCS was consistently presented as well as signposting on how to use and contact the service. Moving out of lockdown, the service has further proved its ability to understand the wider issues affecting the profession and the public with advice on what to expect in a post-COVID opticians, sharing of guidance by the regulatory bodies, and offering insights into how the OCCS operates within the wider industry.

As we move out of the pandemic, the digital and social team will continue to provide relevant insights, useful and actionable information, and support the wider industry.

In 2021-22 the OCCS will resume the awareness raising with the educational institutions and students who are embarking on their optical careers. Through work with stakeholders and multiples, the OCCS will look to continue that work with post graduates who are undertaking their pre-reg placements. This compliments the CET insight sharing activity which bring multiple benefits, including raising the profile and understanding of how the OCCS supports complaint resolution through independent mediation.

- **Insight driven activity – 'The Macular Spectacular'**

Following the potential early trend identified in the 2018-19 annual report and discussed at GOC Council in July 2019 regarding communication and management of macular conditions in primary care, the OCCS has met with the Macular Society to help design a plan to raise practitioner awareness, increase information sharing, develop a practitioner focused campaign which OCCS can support, upskilling the OCCS team and aiding GOC registrants in developing their patient empathy and understanding of non-clinical aspects relevant to the management of macular conditions. Online delivery has begun with close to 500 attendees actively taking part in the first online CET event. Subject to COVID-19 restrictions, planning is underway for further delivery at rescheduled events for 2021/22.





- **Engagement**

Stakeholder engagement remains strong. The OCCS has continued the ongoing investment in these critical relationships. Across the sector, stakeholder response illustrates the commitment to working together and value placed on the OCCS succeeding as a complaint mediation service.

Annual presentations have been delivered to:

- » Chief executives group of key stakeholders
- » National Optometric Advisors Association, for NHS England optometric advisors
- » Multiples – professional services teams
- » FODO and AOP committees.

These sessions facilitate pro-active complaint trend and resolution discussions, and allow the OCCS to share perspectives on strategic work at the GOC to remodel FtP expectations, and the big opportunities to achieve more proportionality, customer satisfaction and timely progression of cases through the FtP framework.

- **Regulation**

Nockolds Resolution was invited to present at the Professional Standards Authority Academic and Research Conference in March 2020 to showcase how complaint mediation has collaborated with the GOC FtP team to support and underpin the remodelling of the GOC FtP processes, and wider exploration of the benefits of mediation in healthcare regulation.

In the spirit of increased collaborative working as encouraged by the PSA, Nockolds Resolution launched a Healthcare Regulators Complaint Forum, which is hosted quarterly and has excellent attendance and participation from all healthcare regulators. The forum supports regulators in corporate complaints, seeking to share the mediation insights to drive consistency and effectiveness.

OCCS insight also contributed to the Nockolds response to the recent Department of Health consultation on regulatory reform published on 24 March 2021.

- **Consumer**

The OCCS team offers the agility and exibility to manage wider consumer issues arising in the sector with pace and efficacy. We continue to respond and contribute to mainstream regional and national media requests such as the consumer affairs programme 'You and Yours' on BBC Radio 4.

Consumer facing guidance and information continues to be developed and promoted through social media, online and via consumer representative groups who provide direct support for vulnerable consumers.





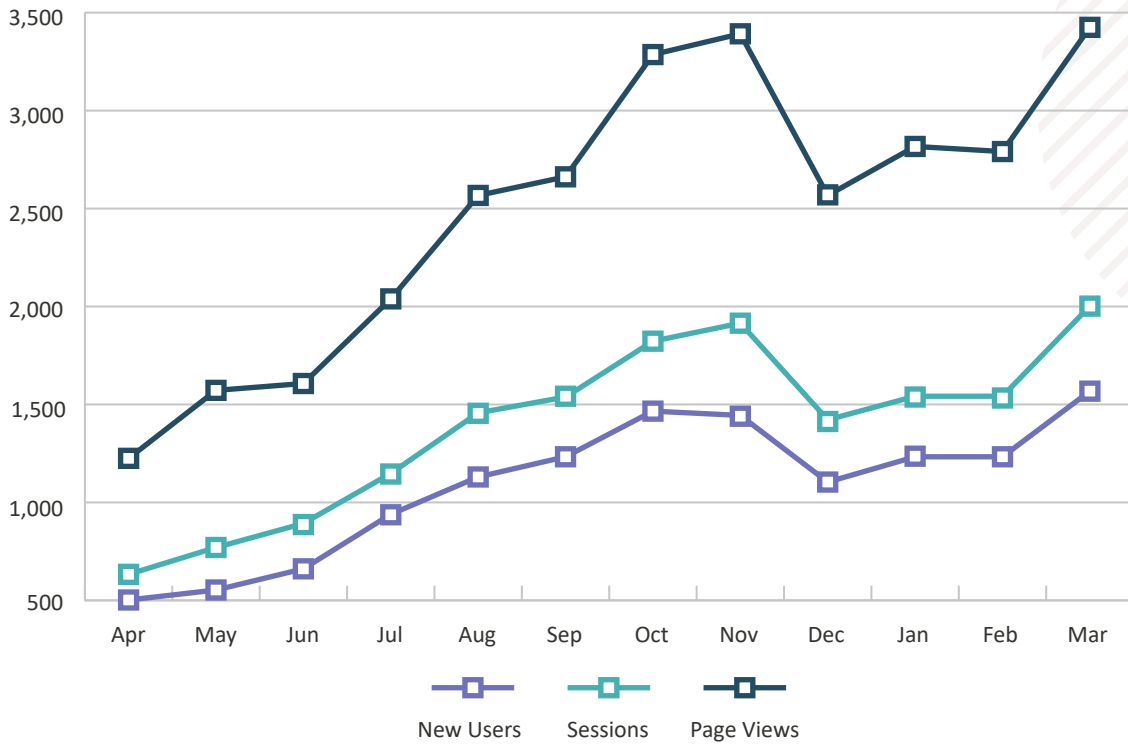
Engagement with patient representatives and charity support groups continues, focus in particular has been with the Macular Society to develop the ‘Macular Spectacular’ initiative.

The OCCS will also feed this insight into the plans to develop a new OCCS website with improved accessibility and resource hubs.

With almost two thirds of OCCS enquiries quoting the OCCS website and search engines as their source of information about the OCCS, the website and social media activity is a crucial channel of communication with consumers, as well as optical practice.

## WEBSITE ACTIVITY

**Fig. 14: Website Traffic Overview**



### Top Website Pages

1. FAQs for Consumers (8,541)
2. Home (7,682)
3. Complaints (3,293)
4. Consumers (2,618)
5. The Process (1,288)





# Customer Service Strategy

## 1. Access and accessibility

The OCCS continually undertakes wider assessments and evaluations to improve accessibility and operational effectiveness supporting service users, and EDI focus will be incorporated in all aspects of this work of the OCCS.

Nockolds has identified key areas of EDI focus relevant to consumer and optical practice teams where a service user has a vulnerability or protected and intersectional characteristics:

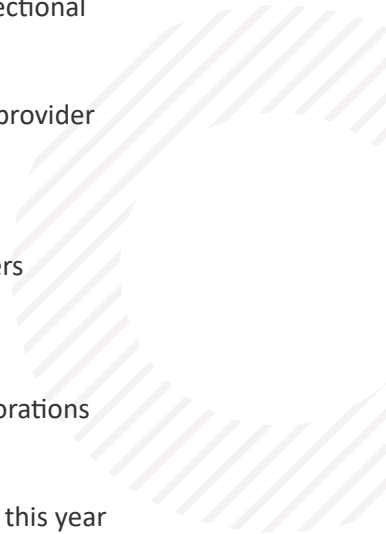
- Awareness of what a consumer can and should expect from their eye care provider
- Awareness of OCCS
- Access to OCCS
- Effective individual complaint resolution, meeting the needs of all consumers including consideration of unconscious bias
- Ability to effectively engage with all consumers
- Bringing a wide and inclusive consumer perspective to initiative and collaborations with the sector.

The OCCS proposes to review the EDI categories and the comparison date later this year to evaluate accessibility against more accurate data on the optical consumer population demographics. This is an area for potential collaboration between the OCCS and the GOC.

Within complaint resolution, the parties interacting with the OCCS can be frustrated and emotive due to the complaint circumstances. The team effectively identifies any specific vulnerability or requirement for additional support which ensures the OCCS process can be adapted and adjusted giving all service users access to the OCCS mediation and ability to have their complaint heard, understood and resolved through an accessible service. The team is mindful and aware that vulnerability may be present in both consumers and registrants, and may be permanent, intermittent, or related to the complaint circumstances presented. The OCCS team also regularly supports consumers and practices in handling and resolving complaints where resolution may be less likely as a consequence of the consumer's vulnerability and how their complaint has been managed at a local level.

During the next 12-18 months, the OCCS will:

- Review and update our vulnerable service user toolkit







- Undertake further team training to support accessibility and agility to offer and implement reasonable adjustments
- Wider method of communication to include video conferencing where this may be a reasonable and beneficial adjustment
- Collaborate with all nine healthcare regulators through the EDI forum to share and develop best practice.

## **2. Communication and correspondence review**

OCCS communication is continually reviewed for clarity and tone. To develop accessible and helpful communication, the OCCS will look to increase the use of infographics as well as review the language and content of practice and consumer correspondence.

Feedback strategy to capture feedback in enquiries where the consumer is given advice and guidance, and referred back to the practice.

The OCCS has set out above how the feedback strategy will be developed to increase response and to evaluate the impact of early OCCS advice and input.

## **3. Mediation in regulation**

The OCCS and wider Nockolds team will work collaboratively with the GOC and other regulators to explore how mediation can support FtP as set out in the government white paper: 'Promoting Professionalism, Reforming Regulation July 2019'. Given the working relationship built over the past five years, the GOC and the OCCS have the opportunity to progress the already ground-breaking work in complaint mediation in regulated healthcare to lead the regulatory field when the government publishes the response to the consultation on regulatory reform later in 2021.

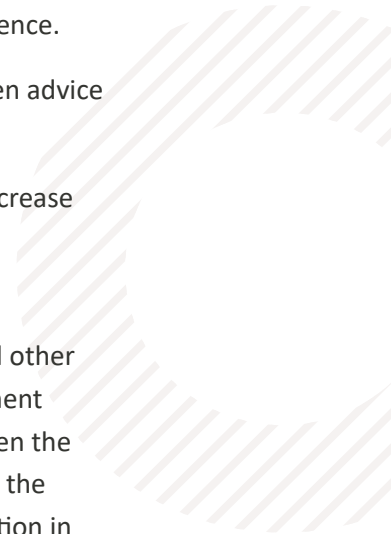
## **4. Complaint network**

The OCCS will explore how best to work collaboratively with the GOC to develop greater interaction and risk management within the overall regulation of eye care. Namely, NHS via performers list, employer/practice links and other bodies to ensure the public are not put at risk by a lack of knowledge or sharing of a registrant's impairment.

## **5. Business regulation**

The OCCS will continue to capture data and insight to:

- Support the implementation of a reformed approach to business regulation as the GOC progresses a strategic aim in this area
- Review the remit of the OCCS given the reform of business regulation, which may increase the number of 'body corporate' registrants if the requirement of regulation is linked to employment of individual registrants and activity. This may have an impact in niche areas of the optical sector, such as refractive surgery and the cross-border issues arising from online supply and sales which may expand with improving technology and the potential to increase remote sight tests and refractions.





# Conclusion

As we look beyond 2021 and adjust to the 'new normal', the OCCS is committed to performing as a highly effective and trusted independent mediation service. The OCCS will continue to share and adapt to consumer insights to ensure that we deliver a standard of support.

The healthcare complaint landscape has experienced a turbulent period. Initial goodwill appeared to evaporate in the summer of 2020. Societal tensions and individual, personal and commercial pressures for both consumers and healthcare professionals contributed to an exponential increase in disputes and complaints. Testimonies and feedback data also tells a very different story of commitment and effort by healthcare professionals to deliver the best possible care to patients in unfamiliar circumstances. Through the delivery of complaint mediation in other sectors and engagement with other ADR bodies, it is clear that optics was not alone in this experience. This is likely to continue to be the reality well into 2021-22.

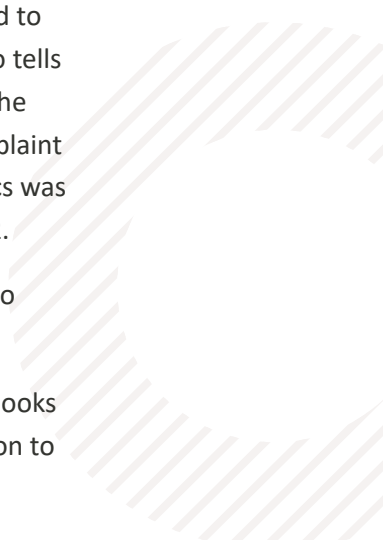
Resilient in the face of COVID-19, the OCCS recognises the need to remain highly agile to maintain this resilience and positive resolution rate during challenging times.

With early indicators encouraging the ongoing work on remodelling FtP, the OCCS also looks forward to continuing to collaborate with the FtP team to bring the benefits of mediation to later stages in the FtP process.



The identified clear strategic aims and objectives for OCCS which develop the mediation service to ensure it remains ahead of the needs of consumers and practices, while continuing to offer value for money and resource agility.

These aims, and the values underpinning them, are closely aligned with the GOC's corporate plan for 2020-2025. While managing the medium-term challenges, the OCCS is committed to supporting the GOC in delivering world class regulation, excellent customer service and continuous improvement and the sector and individual registrants to provide world class eye health and meet the increasingly complex needs of a changing population.





## Appendix 1: Nature of Complaint

	2020-2021
<b>Goods &amp; Service</b>	<b>517</b>
Cataract	2
Concerns with the eye examination	43
Dispense of varifocal	60
Dispensing	106
Perceived error with prescription	146
Concern regarding clinical diagnosis	38
Outcome of Laser eye surgery	67
Prescription prescribed in one practice and dispensed in another	34
Reglaze - issue with consumer's own frame	18
Unknown	3
<b>Product</b>	<b>109</b>
Contact lenses	4
Product – frames	83
Product - lens coating	17
Product - lenses	4
Unknown	1
<b>Customer Care</b>	<b>507</b>
After care	13
Alleged inappropriate selling	26
Attitude	96
Complaint handling	81
Consumer change of mind	27
Delay in supply	99
Dispensing Optician Customer Care	2





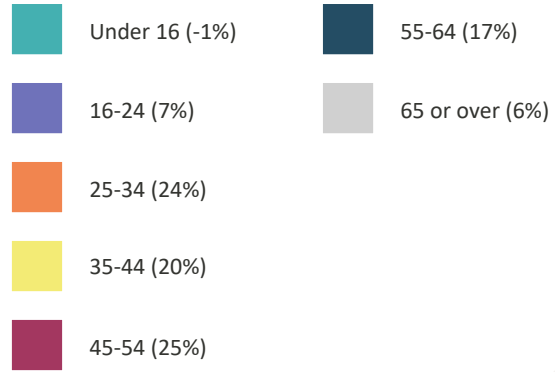
Consumer excluded from practice	6
Failure to deal with concerns/complaint	26
Laser surgery - complaint handling	11
NHS Voucher query	20
Complaint relates to provision of written prescription	48
Non-qualified staff issues	1
Optom customer care	46
Pupillary Distance - entitlement	5
<b>Charges</b>	<b>96</b>
Charges and offer	93
Unknown	3
Other	126
Miscellaneous	120
Unknown	6
<b>Practice Advice</b>	<b>48</b>
<b>Unknown</b>	<b>24</b>



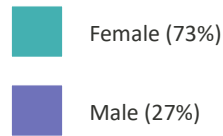
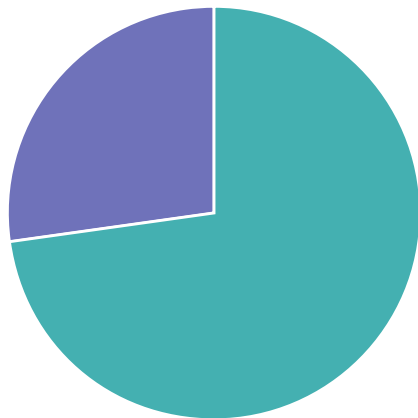


## Appendix 2: EDI Complainant Data Analysis

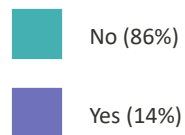
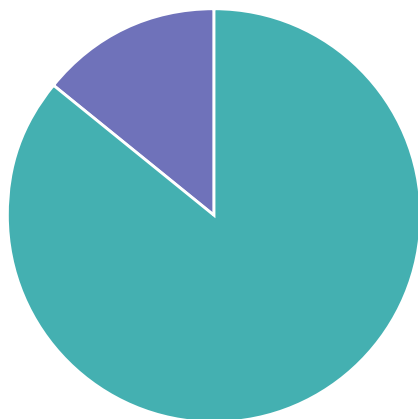
### Age



### Gender

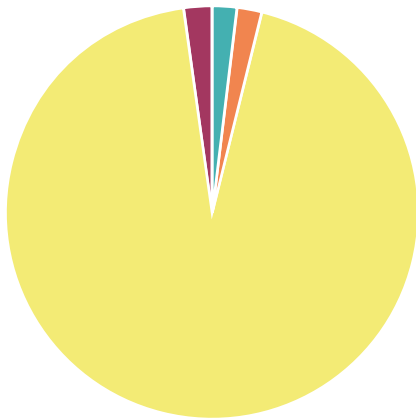


### Disability



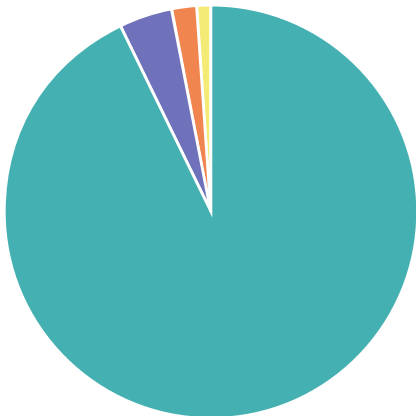


### Ethnicity



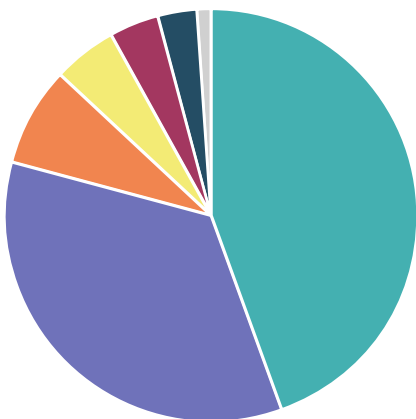
- Asian (2%)
- Black (-1%)
- Mixed (2%)
- White (94%)
- Other (2%)

### Sexual Orientation



- Heterosexual (93%)
- Gay (4%)
- Other (2%)
- Bisexual (1%)

### Marital Status

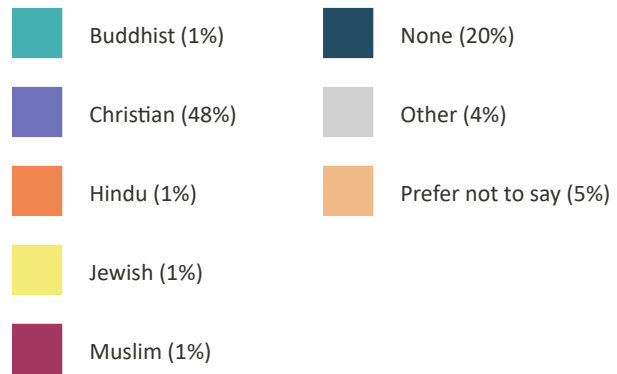
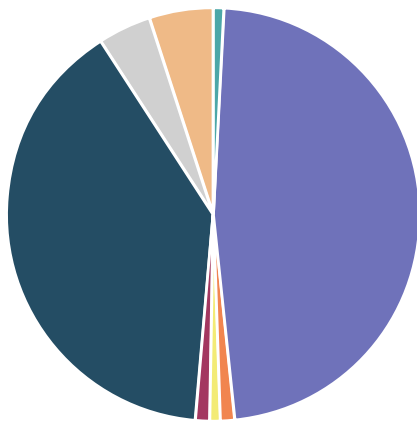


- Married (45%)
- Single (35%)
- Divorced (8%)
- Civil Partnership (5%)
- Prefer not to say (4%)
- Widowed (3%)
- Separated (1%)






## Religion





## Appendix 3: 2020-23 Strategic Aims

Over a longer time period, the OCCS 2020-2023 strategic aims remain focused on ensuring that the service remains a world leader in complaint resolution. More specifically, the OCCS plans to:

- Support the GOC in delivering the corporate and strategic plans and corporate vision for 2020-2027
  - Identify solutions to the key challenges faced by the sector, such as an ageing population and the increased provision of ever more complex eye care in primary settings
  - Effectively manage the resources available to the OCCS in order to ensure that efficiencies within the GOC are achieved by widening the use of the OCCS (which offers more agility and potential for economies of scale).
  - Work collaboratively with the FtP team to extract value from the introduction of Acceptance Criteria and proactively drive low-level complaints out of triage to OCCS for resolution
  - Work alongside the FtP team to ensure that PSA objectives are successfully achieved
  - Work together with the GOC to explore how mediation can support FtP as outlined in the government white paper: 'Promoting Professionalism, Reforming Regulation July 2019'. Given the working relationship built over the past five years, the GOC and the OCCS have the opportunity to progress the already ground-breaking work in complaint mediation in regulated healthcare to lead the regulatory field
  - Deliver insight sharing activity which provides upstreaming and supports an embedded learning culture
  - Deliver student presentations at optometry universities and dispensing colleges to drive student awareness of OCCS as well as a greater understanding of professionalism and the expectations of consumers, the public and their regulator
  - Increase awareness amongst students of the importance of effective complaint management
  - Continue using our CET/CPD proposition to carry a positive message of change in FtP to registrants and to incorporate learnings from FtP cases and analysis of complaints referred into both organisations
  - Increase the use of online tools and mediums to widen reach to members of the optical professions and share 'bitesize' learnings and insight
  - Continually develop and improve the OCCS effectiveness, accessibility and inclusivity, ensuring that there is a clear emphasis on equality, diversity and inclusion
  - Continually evaluate and develop initiatives which seek to improve the accessibility of the OCCS for all consumers, and to ensure that all consumers have a clear understanding of what they can expect from their eye care provider to assess 'what good looks like'.
- 





To improve the effectiveness of consumer and public protection, the OCCS will remain committed to:

- Working alongside the GOC to develop greater interaction and risk management within the overall regulation of eye care. Namely, this will be accomplished by adhering to the points featured on the NHS performers list, employer/practice links and other bodies to ensure the public are not put at risk by a lack of knowledge or sharing of a registrant's impairment
- Working collaboratively to support the implementation of a reformed approach to business regulation.

In recent years, the OCCS has observed an increase in complaints referred to the service where the business providing eye care services and supplying spectacles/lenses was not registered with the GOC. It was also revealed that, in such instances, no individual registrant was involved in the complaint. Many consumers expect all suppliers of eyecare and optical products to be regulated by the GOC. The knowledge gained, and evidence collated by the OCCS will be shared with the GOC to inform the GOC's proposed strategic aim to seek reform of the Opticians Act and business regulation. As the GOC progresses a strategic aim in this area, the OCCS will continue to work collaboratively with the GOC in order to support the regulator in delivering a more comprehensive, simpler and vastly more effective system of business regulation.

In addition to these objectives, the OCCS plans to work collaboratively with the GOC to review the remit of the OCCS given the reform of business regulation, activity in niche areas of the sector such as refractive surgery, and the cross-border issues arising from online supply and sales which may expand with improving technology and the potential to increase remote sight tests and refractions.

