



Future Vision

Complaint Mediation Supporting Optical Practice, Patient Relationships and Regulation

Annual Report 2019-20



www.opticalcomplaints.co.uk



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1 Introduction

2019-20 has been a year of both reflection and future strategic vision for the OCCS. As a service, we have reflected, with humble pride, on the achievements of the OCCS since 2014. This reflection has highlighted the role the service has played in supporting consumers and practices at an individual level, and the strategic role played by the OCCS within the optical sector.

In the last 18 months, we have also seen significant transition in the GOC Fitness to Practise process starting with the introductions of Acceptance Criteria and more recently the remodelling of the triage process. These changes are directly relevant to the OCCS, and the last 18 months have seen a true collaborative approach taken by both organisations to deliver effective and proportionate complaint resolution, public protection and the use of shared insight to devise an effective implementation plan and embed these changes. As reported to the GOC Council on 13 May 2020, the data indicates these changes are delivering real results. We have seen a reduction in investigations opened by the FtP team, alongside an increase in complaint mediations opened by the OCCS. We have also seen a fall in investigations involving consumer related issues such as non-tolerance and communication. These results encourage the OCCS in its efforts to deliver strategic aims for the future.

Nockolds Resolution was delighted to be reappointed in February 2020 as the provider of complaint mediation in optics as the OCCS. This competitive procurement process allowed the GOC to ensure that it receives excellent value for money and return on its investment in the service, and was a worthwhile exercise in both reflection and also exploring how the OCCS can continue to develop and support the GOC in achieving the Corporate Strategy for 2020 and beyond. The continuity of delivery and relationships with the GOC, stakeholders and practices enables the OCCS to provide complaint mediation, insight and wider support as the sector navigates the challenges presented by the COVID-19 pandemic.

Continual improvement is a cornerstone of the OCCS and Nockolds Resolution, both within our activity and also through our commitment to sharing complaint insight to support the sector and GOC registrants to improve customer care, communication and the delivery of optical care. With the Department of Health and Social Care referencing mediation in their response to proposals for Regulatory Reform in healthcare, the role of alternative and innovative approaches to FtP and concerns are being explored and developed. Through the GOC's forward-thinking appointment of a mediation focused provider in 2014, optics has six years of experience in evolving how mediation can support FtP and wider complaint resolution. The OCCS is trusted by the sector and has the confidence of the regulator. Both provide the strong foundations to enable the OCCS, through Nockolds Resolution and the GOC, to lead the way in developing the role of mediation, support the GOC in delivering world class regulation with excellent customer service and accessibility for consumers, registrants and the demands of the wider public.

The OCCS looks forward to playing its part in leading the way!



by Jennie Jones

Head of OCCS

Partner at Nockolds Resolution

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Executive Summary

OCCS Received: 1,611 enquiries

OCCS Concluded: 1,626 enquiries and mediations

Fig. 1 OCCS Activity 2014-2020

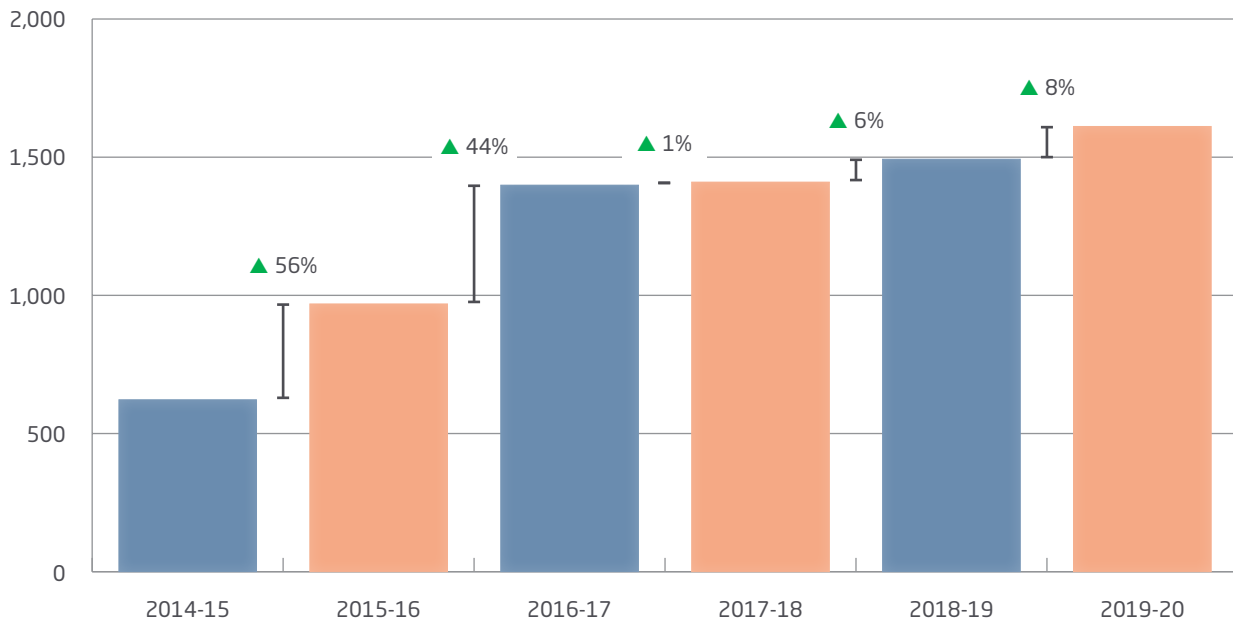
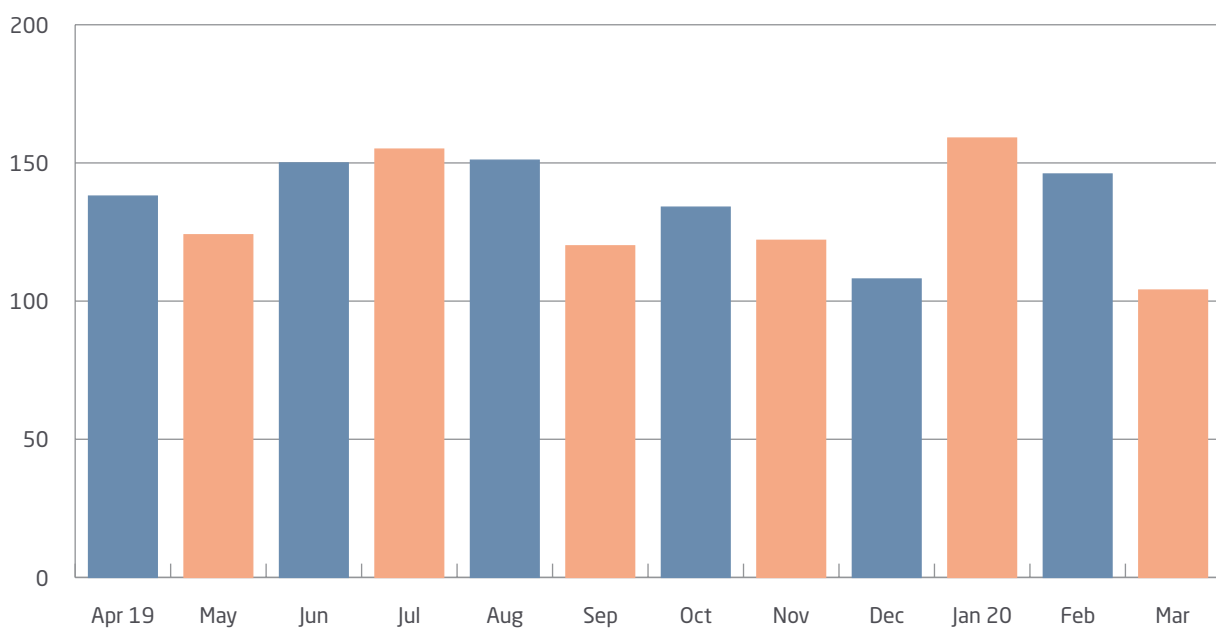
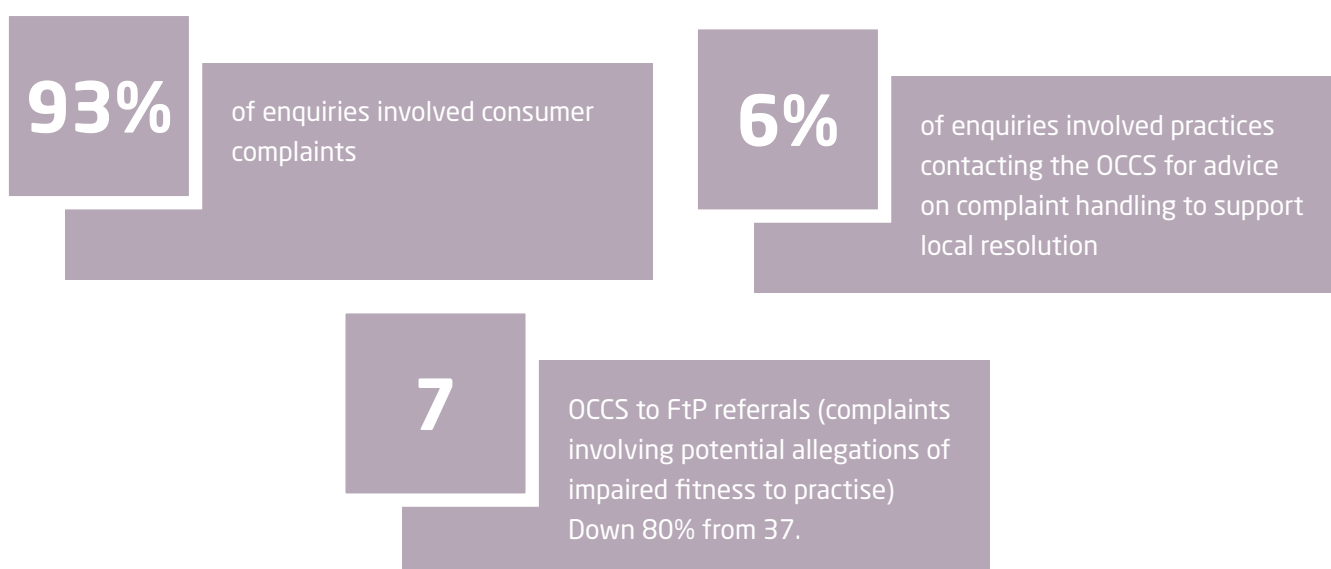


Fig. 2 OCCS Activity - Enquiries Received Per Month



The impact of COVID-19 and government restrictions touched the last two months of 2019-20, and the service received a lower number of enquiries in March 2020 than was forecast. Resolution and mediation progressions were maintained as the lockdown restrictions came into place on 23 March 2020. The OCCS will continue to monitor and analyse COVID-19 related complaints and facilitate sector-wide approaches as becomes necessary.

Key Trends in OCCS Remit and Enquiries



This year, the OCCS has seen an increase in enquiries by 113 compared to a decrease in FtP enquiries of 111. The OCCS considers this outcome to be closely linked to the investment in collaborative working with the FtP team in implementing Acceptance Criteria and underpinning the remodelling of the FtP triage and overall process.

Outcome Trends

The outcomes of enquiries during 2019-20 has remained consistent with previous years.

Outcome - in remit	% in remit	2018-19
Referred to practice with advance and early mediation	41%	70%
Enquiry resolved with advice	29%	
Client did not pursue	10%	9%
Resolved on mediation	18%	18%
Mediation concluded without resolution	2%	3%
TOTAL	100%	

Early Involvement of the OCCS

In the enquiries where the consumer is given advice and/or referred back to the practice with OCCS input, only 6.4% (64 of 1007) return to the OCCS requiring mediation assistance. This illustrates the value of that early input, and importantly the time invested by the consumer and the optical practice to resolve the complaint at that stage.

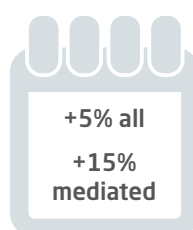
Timescales

Average number of days to conclude a complaint referral



down from 19.9 days

Improvement in percentage of complaints concluded within 45 days or less

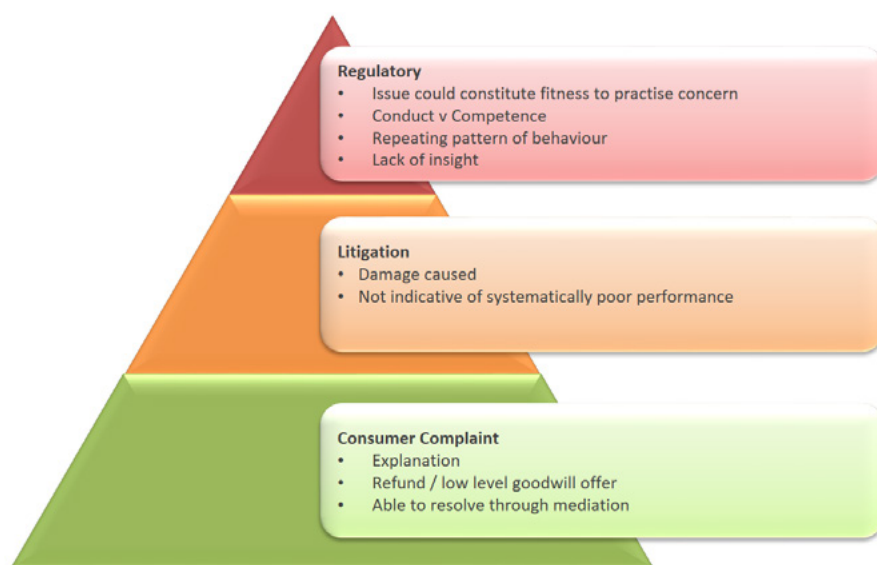


Complaint insight

Nature of complaint	%	v 18-19
Goods and service	47%	+ 4
Customer care	29%	- 6
Charges	6%	-
Product	9%	- 2
Other	9%	+ 6
TOTAL	100%	

Key trends for 2019-20

- Complaints involving customer care issues reduced compared to last year;
- Increase in 'other' complaints such as data protection, inter-practice disputes, practices ceasing to trade;
- Increase in complaints involving consumer dissatisfaction with the outcome of refractive or cataract surgery;
- Increase in core optic consumer issues such as prescription queries, varifocal dispensing, dissatisfaction with the eye examination, which fall within three key areas:
 - » Concerns which are unlikely to progress in the FtP process following remodelling of FtP triage;
 - » Concerns which would not enter the FtP process under the 2018 Acceptance Criteria;
 - » Issues which involve the consumer-business relationship and the delivery of eyecare or products



This OCCS seeks to mediate concerns which do not amount to FtP concerns or allegations where a patient has suffered optical harm. The work the OCCS team have been undertaking with the sector focuses on helping registrant to appreciate the different levels of concern and how to approach each appropriately. The collaborative work between the FtP team and the OCCS allows concerns to be proportionately resolved or addressed within the most appropriate forum, benefiting patients, registrants and the wider sector. This pyramid graphic helps registrants to appreciate the severity of complaints and enable them to approach issues in an objective and proportionate way, which supports resolution and reflective practice.

Feedback

The OCCS continues to request feedback from all service users. Feedback remains excellent, and provides reassurance that the service is seen as independent, impartial and effective.

Response rates have fallen during 2019-20, and the approach to gathering feedback continues to be developed and evolved to reverse this trend.

Feedback is also obtained through dialogue with stakeholders, professional bodies and major employers/multiples.

Consumer	Satisfied or very satisfied
The client would use the practice again	44%
The client is satisfied with the process	90%
The OCCS was fair	87%
The consumer would use OCCS again	93%
The OCCS was easy to contact	98%
The OCCS was productive	93%

The client would use ADR again	93%
The OCCS understood my concerns	95%
The OCCS was efficient	95%
The client is satisfied with the outcome	88%
The OCCS was helpful	93%
The client would recommend the OCCS to others	93%

3 Beyond 2020

Following a competitive procurement process in December 2019 - January 2020, Nockolds was re-appointed to deliver the OCCS from 1 April 2020. The Nockolds Team welcomed the opportunity to reflect and evaluate on the work and impact of the OCCS since 2014.

There are three reflections arising from the analysis and evaluations:

1. The GOC and the OCCS are leading the way in international healthcare regulation in developing an effective alternative dispute resolution approach, using mediation to support regulation alongside the individuals and businesses involved. Nockolds has now presented an overview of the GOC / OCCS case study to the Professional Standards Authority - Academic and Research Conference in March 2020, and most recently to the internal PSA team;
2. The OCCS has seen a 259% increase in activity since 2014, and with investments in technology, ways of working and engagement with the sector has maintained resolution and satisfaction rates, while delivering a highly cost effective 59% reduction in unit cost per case;
3. The potential for further development of mediation in regulation and in particular, FtP is still in the early stages. Acceptance Criteria, triage and FtP remodelling are bearing fruit with reductions in FtP investigations opened and current case loads¹. With 83% of case examiner decisions concluding the investigation at that stage, there is scope for the GOC and the OCCS team to continue working to explore how mediation can be used to benefit all those involved, and allowing the GOC to focus resources on timely progression of those most serious concerns and upstreaming to support the professions in maintaining and raising standards.

GOC Strategic Aims

World Class Regulation	Improving Customer Service	Continuous Improvement
<ul style="list-style-type: none">– Rated highly PSA– Innovative approaches to regulation– Public and professional confidence	<ul style="list-style-type: none">– Cx engagement– EDI– Communicating with customers	<ul style="list-style-type: none">– CPD– Intelligence-led insight– Learning culture

OCCS Strategic Aims

World Class Resolution	Leverage Benefits of FtP Remodelling	Upstreaming
<ul style="list-style-type: none">– Satisfaction and resolution success– Capability to do more– Disruptive innovators	<ul style="list-style-type: none">– Work collaboratively with GOC– OCCS role following FtP triage remodelling	<ul style="list-style-type: none">– Increasing CET / CPD– Intelligence-led insight– GOC 'halo' and communications agility

¹ FtP Performance Report presented to GOC on 13 May 2020

The OCCS must continue to evolve and develop to meet the ever-changing needs of the optical sector and patient groups. These will include:

- A changing patient demographic;
- Fast-paced development of treatments and practice diagnostic capability;
- Changes to the delivery of eye health care including online and remote provision which has been an aspect of eyecare highlighted during the COVID-19 restrictions, and use of artificial intelligence (AI);
- Evolution of the professional roles and demands of those healthcare professionals delivering care;
- Commissioning and supply variations and changes in the NHS contracts and across the four nations.

Complaint resolution and mediation must keep ahead of these developments to ensure the service has the capability and capacity to handle the changes and variations in complaints escalating to the service. The insight also becomes invaluable in terms of:

- Acting as an earlier indicator of potential concerns;
- Highlighting areas where professionals and patients may be facing challenges and conflict, and how to educate and equip the profession to solve those challenges;
- Informing educational requirements and skills needed in consumer / patient communication, counselling and chronic condition management.

In 2020-21, the OCCS will continue to support the sector in delivering complaint mediation within the challenging environment of the COVID-19 pandemic, restrictions to protect public health and the commercial consequences for practices, and their patients. As a result, the OCCS objectives will remain as identified and implemented in an agile and sensitive way.

4

Objectives and Ambitions

To date, the OCCS has delivered on the following 2019-20 objectives:

2019-20 Objective Review

Share insight and analysis from OCCS activity to date, to include activity with education establishments to reach out to optical students.

Continue to support the GOC strategy for managing fitness to practise, by identifying and implementing ongoing plans to assist the FtP team to conclude FtP complaints more quickly and effectively and in the delivery of the milestones to track progress.

Continue to examine and consider ways of working that will support the embedding of development of Acceptance Criteria by the GOC.

Continue to monitor feedback responses and rates to ensure OCCS effectiveness and accessibility.

In the first year of a new contract phase, the OCCS is setting out the objectives for 2020-21, and also for the longer term.

Proposed 2020-21 objectives:

- Share insight and analysis from OCCS activity to date, to include activity with education establishments to reach out to optical students;
- Continue to support the GOC strategy for managing fitness to practise to secure PSA objectives are delivered;
- Continue to examine and consider ways of working that will support increased sensitivity and specificity of FtP process;
- Develop collaboration across healthcare regulators around complaint management and promote the GOC as an exemplar in this arena.

OCCS 2020-23 Strategic Aims

Development of the OCCS to ensure it delivers world class complaint resolution

- Support the GOC in delivering the corporate and strategic plans for 2020-27;
- The challenges faced by the sector such as an ageing population and the increased provision of ever more complex eyecare in primary settings; and
- Resource available to the OCCS, which could be linked to resource efficiencies within the GOC achieved by widening the use of the OCCS (which offers more agility and potential for economies of scale).

Leverage the benefits FtP remodelling by delivering trusted complaint resolution in optics

- Work collaboratively with the FtP team to extract value from introduction of Acceptance Criteria and proactively drive low-level complaints out of triage to OCCS for resolution;
- Work collaboratively with FtP to ensure PSA objectives are successfully delivered;
- Work collaboratively with the GOC to explore how mediation can support FtP as set 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 the OCCS, greater understanding of professionalism and expectations of consumers, the public and their regulator, and effective complaint management;
- Continue to use our CET proposition to carry positive messages of change in FtP to registrants, and to incorporate learnings from FtP cases and analysis of complaints referred into both organisations;
- Increased use of online tools and medium to widen reach to members of the optical professions and share 'bite size' learnings and insight.

Continually develop and improve the OCCS effectiveness, accessibility and inclusivity (Equality, Diversity and Inclusion)

- Continue to evaluate and develop initiatives 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 eyecare provider to assess 'what good looks like'.

Effective consumer and public protection

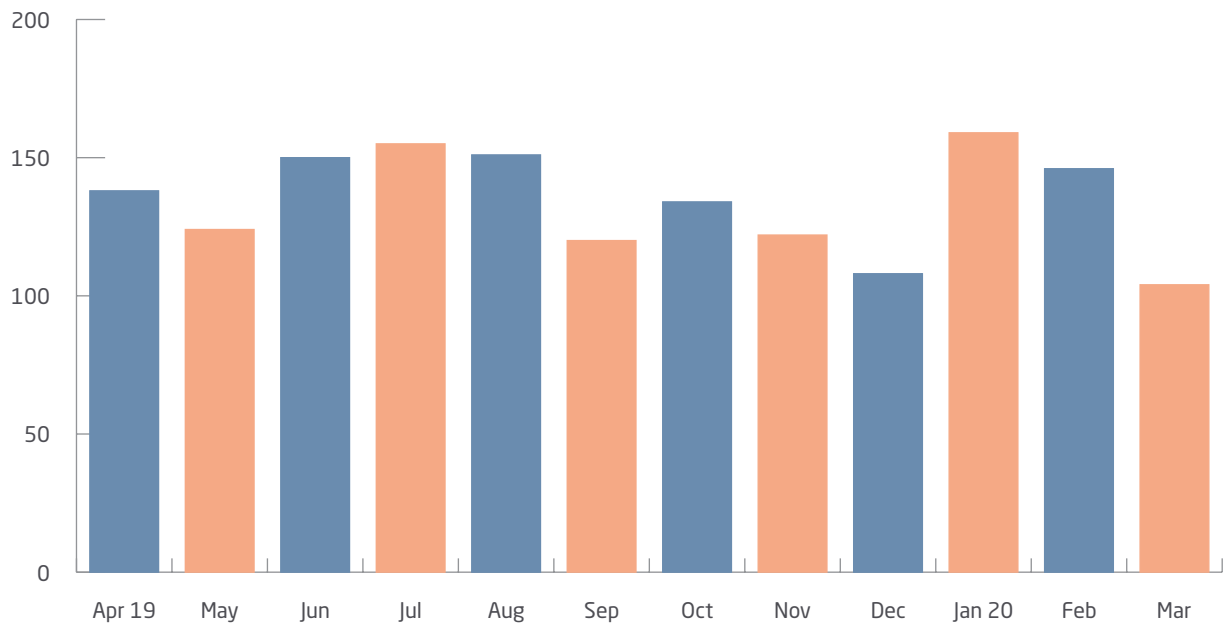
- Work collaboratively with the GOC to develop greater interaction and risk management within the overall regulation of eyecare namely, NHS via performers list, employer/practice links and other bodies to ensure the public are not put at risk by a lack of knowledge or sharing of a registrant's impairment.
- Work collaboratively to support the implementation of a reformed approach to business regulation:
 - » In recent years, the OCCS has seen 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 and 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 its 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, to support the regulator in delivering a comprehensive, simpler and more effective system of business regulation.
 - » 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.

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OCCS Overview

a. Enquiry Volumes

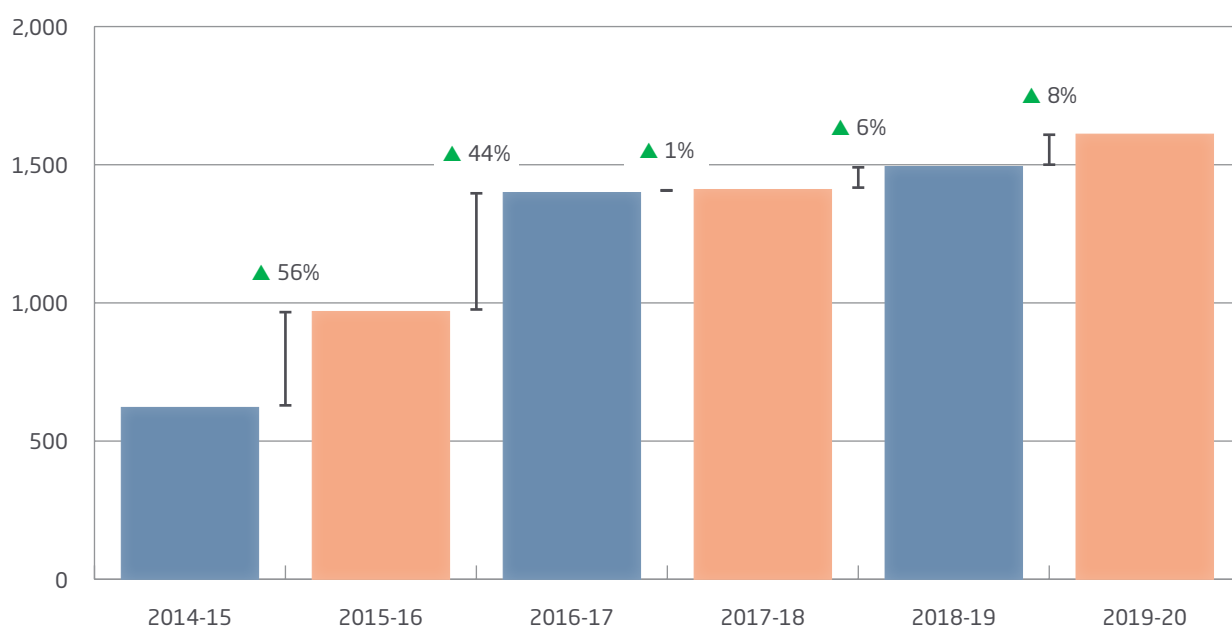
Fig. 2 OCCS Activity - Enquiries Received Per Month



Activity was forecast to reach around 1,700 in 2019-20. The OCCS received 1,611 new enquiries (referrals to the service).

In March 2020, the OCCS received 104 enquiries, which is down on the monthly average of 134, and against an average of 153 in January and February 2020. While the impact of the COVID-19 pandemic is still to be seen, at this stage, this variation is likely to be linked to the early phase of the COVID-19 pandemic and the associated public health concerns and restrictions.

Fig. 1 OCCS Activity 2014-2020



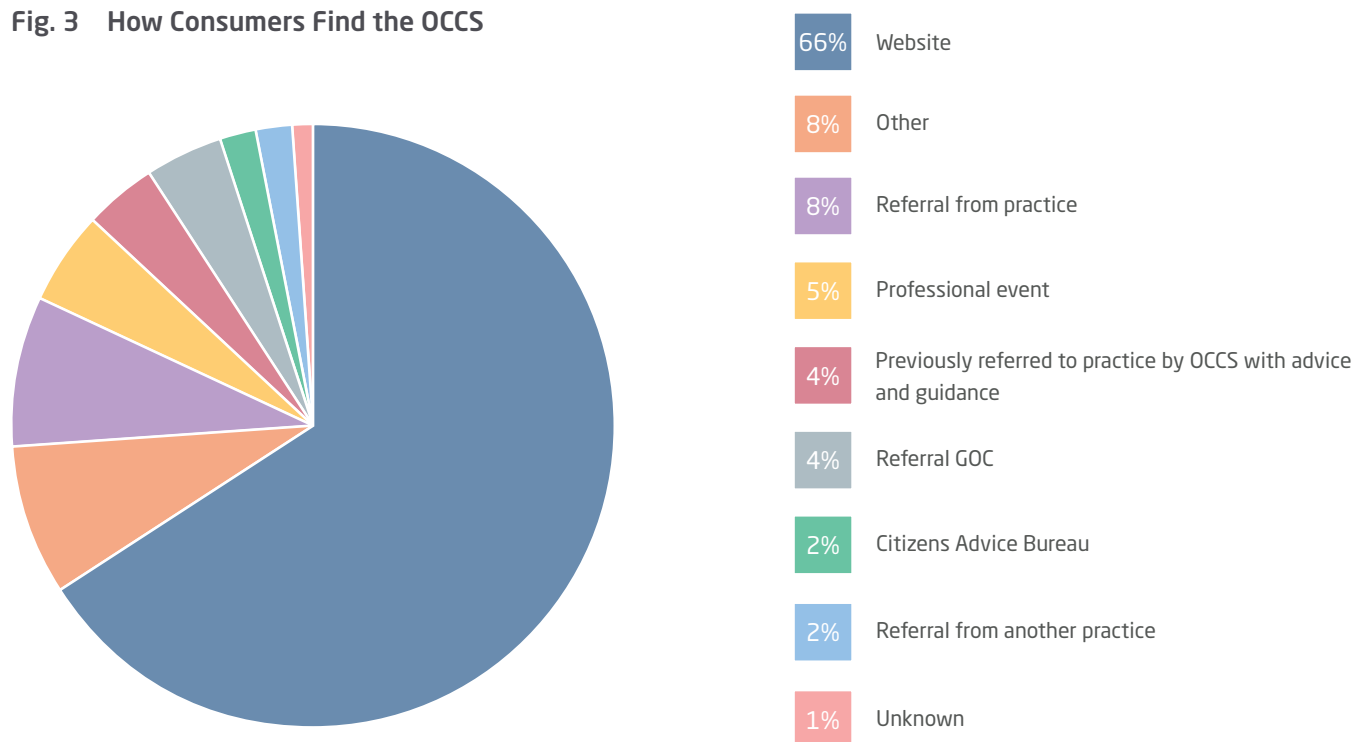
The OCCS received 113 more enquiries in 2019-20 compared to 2018-19, which equates to an 8% increase. In context, the UK Optical market was valued at £3.3 billion in 2019, with over 23 million sight tests conducted. The nature of the complaints referred do not indicate a shift in customer care across the sector. While the increase in consumer complaints involving refractive or cataract surgery has increased, the OCCS analysis suggests a positive impact of Acceptance Criteria and FtP triage remodelling, and the associated OCCS insight sharing and communication work have been the drivers behind the increase. The OCCS will continue to analyse and evaluate during 2020-21.

During the initial phase of the COVID-19 pandemic, the OCCS saw a fall in the number of referrals into the service. The OCCS received a low number of COVID-19 related complaints mainly linked with the closure of a practice, and consumers seeking advice on where to go and who to contact. These enquiries were managed proactively and often involved putting the consumer and practice team in contact. The OCCS recognises the commitment and work within the sector to keep consumers informed, to maintain the delivery of urgent, emergency or essential eye care in accordance with regulations and restrictions in place across the four nations of the UK. The OCCS will continue to work collaboratively with the sector to provide mediation support and share insight to facilitate an ongoing pro-active approach to managing the associated impact of the pandemic.

The OCCS will provide further analysis of any COVID-19 related consumer issues over the coming months.

b. Source

Fig. 3 How Consumers Find the OCCS



59 concerns were referred to the OCCS by the GOC during 2019-20. When considered against the number of enquiries received by the GOC during the same period (342), the number of referrals represent a significant proportion of enquiries, and illustrates the positive impact of the OCCS in supporting the management of concerns raised with the GOC and triaging of concerns within the FtP process.

The number of complaints returning to the OCCS for mediation after being referred back to the practice with advice and guidance, remains low at 4% of all enquiries. This is consistent with previous years and demonstrates the effectiveness of the advice and guidance given to consumers who have not yet exhausted the complaint process with the practice, and the commitment of optical practices to resolve complaints at a local level.

c. Conclusion Rate

During 2019-20, the OCCS concluded 1,626 complaint interactions.

6% of enquiries came from optical practices seeking advice and guidance to aid local resolution.

d. Outcomes

Fig. 4 Outcome Of All Enquiries

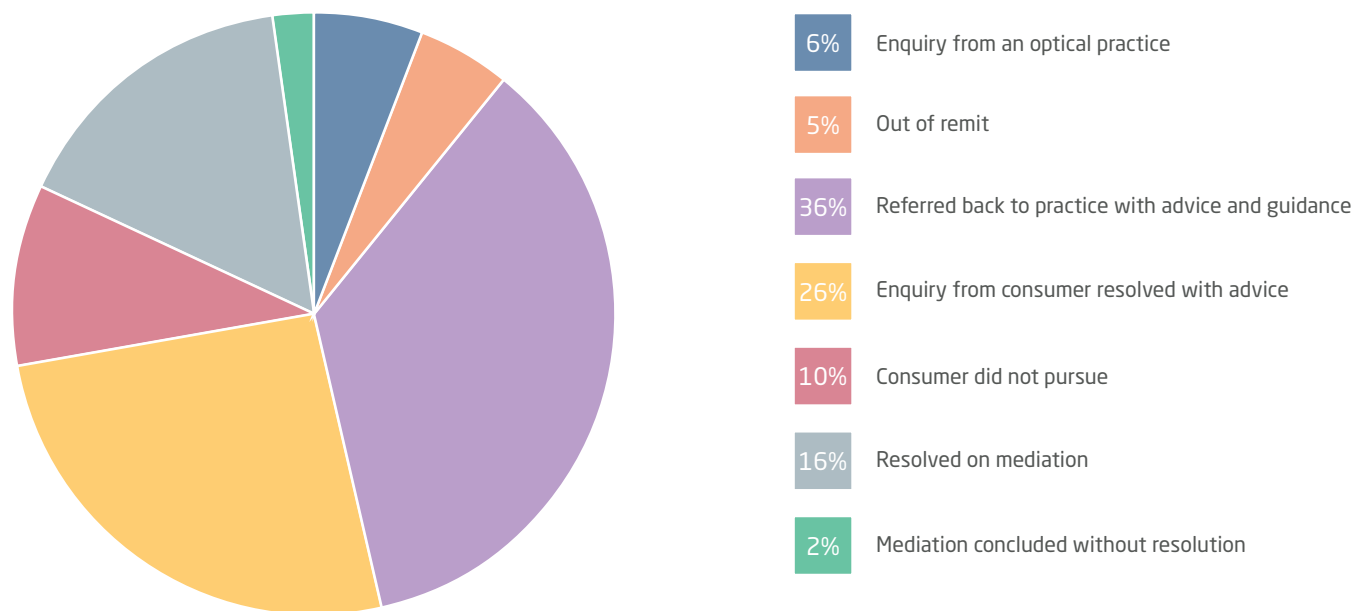
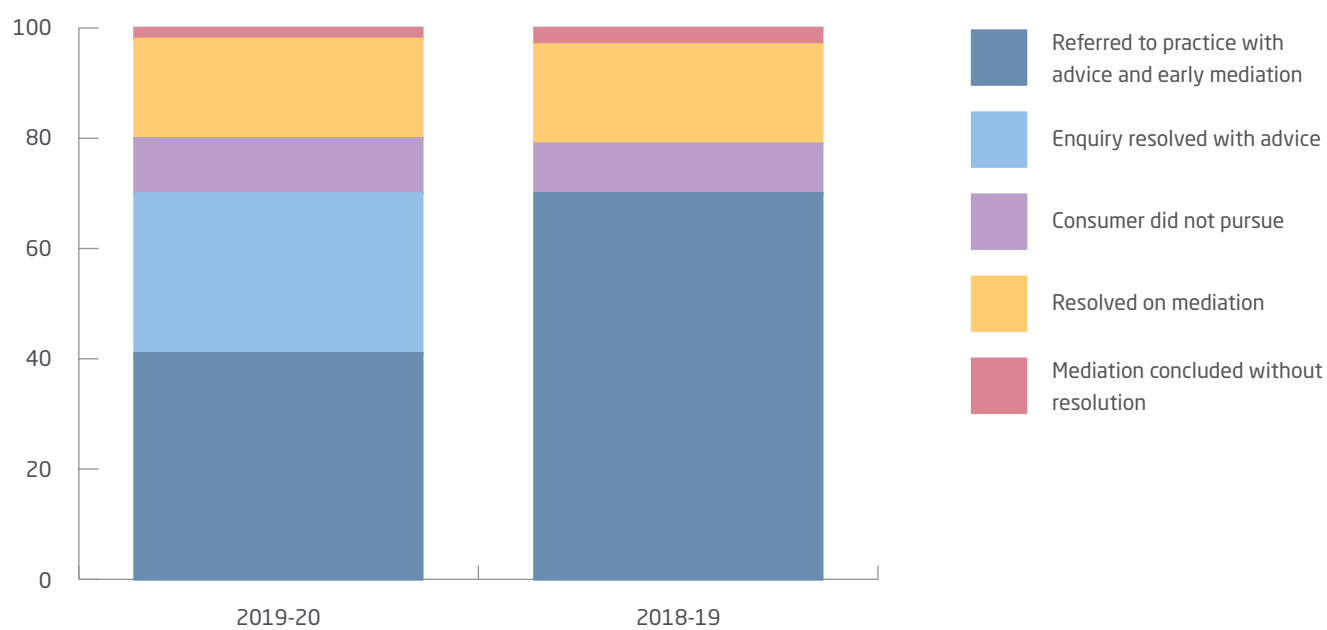
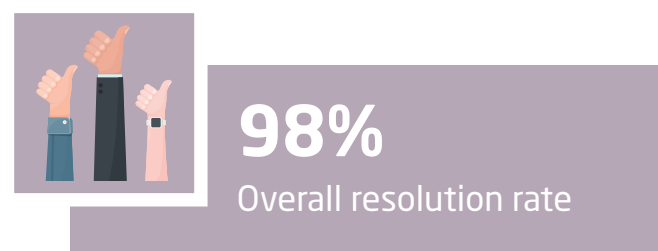


Fig. 5 Outcome of Enquiries (in Remit)



The OCCS has provided more analysis of those enquiries where the OCCS has an early involvement in the complaint. In previous years, these outcomes were categorised under one 'outcome' - referred to practice. In fact, the OCCS identified that a proportion of those enquiries were resolved through interaction with the OCCS team, and advice being given. In 2019-20 a new outcome group of 'Enquiry resolved with advice' was introduced. The proportion of enquiries concluded with a referral back to practice with OCCS input or resolved with OCCS advice is comparable with previous years, but this year sub categorised.



Where the OCCS provides full mediation, the mediation is successful in 91% of the mediations.

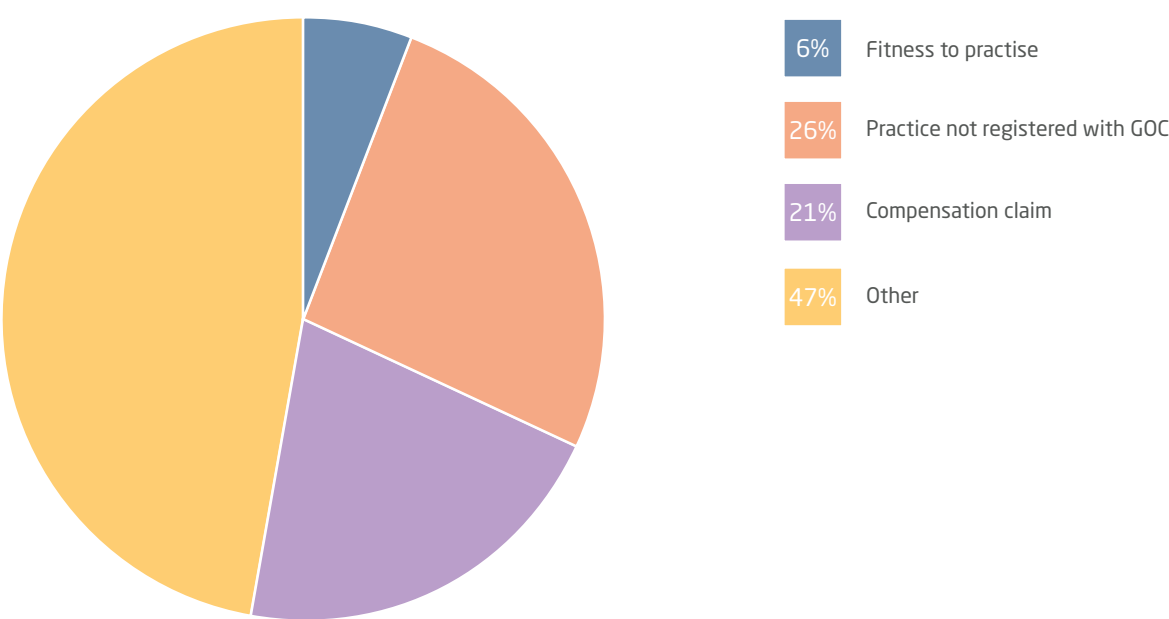
In mediated complaints involving refractive or cataract surgery, the resolution rate is lower at 74%.

e. Remit

93% of enquiries related to consumer complaints, and this is a 4% increase on 2018-19.

Of the 7% of enquiries falling outside the remit of the OCCS:

Fig. 6 Reasons Complaint Falls Outside of the Remit of the OCCS



Fitness to practise referrals by OCCS to GOC - 7

- 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 by 81%, from 37 to 7, and equates to 0.4% of the enquiries concluded in 2019-20. 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.

FtP referrals down:

▼ 81% ▼

No GOC registrant identified within the complaint circumstances or consumer interaction - 32

- 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 (32). 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 - 26

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

Other

- The most significant increase in 'out of remit' enquiries was seen in the 'other' category (58, compared to 49 in 2018-19) and these have included:
 - 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.

f. Timescale and Resolution Periods

Average for all OCCS interactions is 12.4 days.

Average for all mediations is 40.14 days.

	All	Variance on 2018-19	Mediated	Refractive - All	Refractive - Mediated
Average (days)	12.4	- 7.5 days	40.14	28.6	75.6

% Concluded			Optics	Refractive	
0-45 days	91%	+ 5%	71% (+ 15%)	82%	48%
46-90 days	7%	- 1%	21% (- 5%)	9%	27%
Over 90 days	2%	- 4%	8% (- 10%)	9%	25%

Given the distinct nature of refractive and cataract surgery related complaints, the OCCS have analysed the timescales and resolution rates in these complaints.

g. 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.

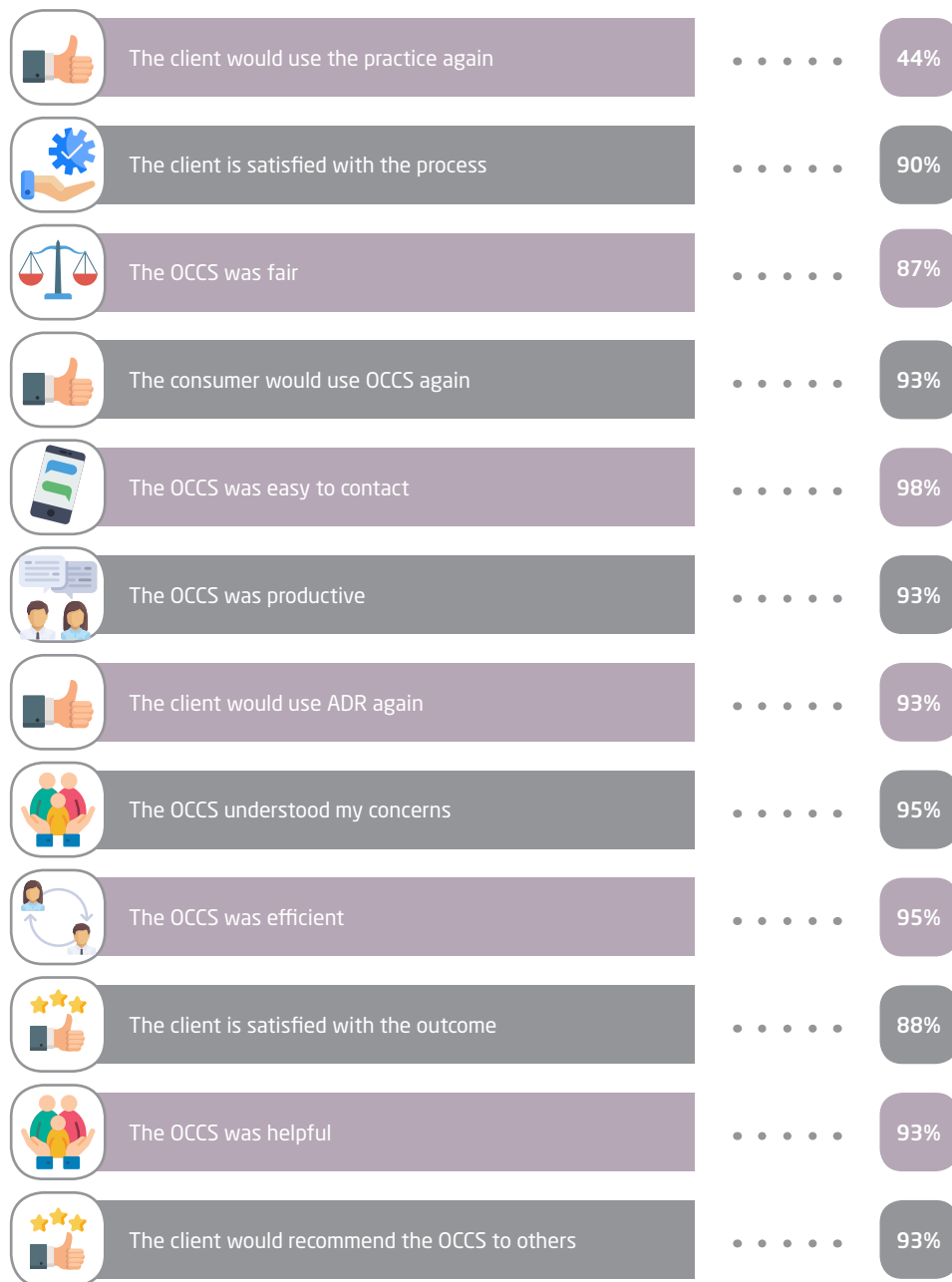
Response rates: 14% of mediations (down from 33% 2018-19)

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

Examples of feedback received during 2019-20:

- ‘Thanks a million for all your efforts, I couldn’t be happier. This is completely unexpected!!!’
- ‘Thanks again, what an amazing service you are, I hope you all know that’
- ‘Wanted to express how eternally grateful I am for both your (successful) efforts to help me out with this. I found it all extremely stressful dealing with the practice myself and as soon as you started mediating it made such a difference’
- ‘I hope you realise what a great job you do, and get some satisfaction out of helping me with this’
- ‘Thanks again and know that you have made me very happy today’
- ‘We have never received a complaint via the OCCS before and am impressed at the mediation service that you offer’.

Feedback from practice representatives and optical stakeholders was provided during the 2019-20 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.



“

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 receive 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 Businesses

“

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 Businesses

“

I have always found working with the OCCS team a pleasure and have never hesitated to advise one of our stores that, in the event of them being unable to resolve a concern at a local level, they should refer the complaint to the OCCS. I do this because in my experience the OCCS team will always take a balanced and pragmatic approach to any complaint and will work very hard to assist both the complainant and store reach a mutually agreeable conclusion.

- Professional Services Support, Multiple Optical Businesses

“

Since first winning the contract in 2014, they have taken a moribund service and transformed it into vital part of the optical infrastructure which is trusted and respected by patients, practitioners and optical providers alike. It has also taken complaints handling upstream through CET and seminars and, by providing service excellence in all cases, has reached the point where practices and practitioners come to them for advice before issues become a complaint. This makes life easier for patients for whom making complaints can sometimes be daunting. Moreover, their support to complainants and practices is second to none and they are in our view the premier mediation organisation in clinical complaints resolution.

- Optical Stakeholder and Indemnity Insurer



We have been very impressed with the way [the OCCS team have 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 have 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 2019. The mediation was reviewed by the Head of OCCS and the Mediation Services Manager. The concerns were resolved through a telephone conversation between the Head of OCCS and the practice owner.

Evaluation of feedback for 2020-23

There has been a downward trend in response rates to feedback requests in recent years. The OCCS has undertaken a wide ranging review of the feedback strategy and process.

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

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, 14% is seen as a strong response compared to other customer service benchmarking data. The OCCS are committed to obtaining feedback through direct requests, 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.

6

Complaint Insight

a. What Do Consumers Complain About?



This year, the OCCS has categorised enquiries from practices as a stand-alone group. These account for 6% of enquiries received. This will enable ongoing comparison in the future.

The data below shows the nature of complaints excluding practice enquiries, which allows a direct comparison with 2018-19:

Nature of Complaint	%	v 2018-19
Goods and service	47%	+ 4
Customer care	29%	- 6
Charges	6%	-
Product	9%	- 2
Other	9%	+ 6

Appendix 1 provides the detailed data on the sub-nature of complaints. This allows more in depth of analysis of complaints and provides useful insight.

The five most common complaint issues as presented by the consumer, and referred to the OCCS in 2019-20:

1. Consumer complains the prescription issued was incorrect (231);
2. Outcome of laser eye surgery (102);
3. Charges (93);
4. Concerns regarding the eye examination (81);
5. Prescription dispensed by a different practice (76).

In terms of variance compared to complaints referred to the OCCS in 2018-19:

1. Complaints involving consumer dissatisfaction with the outcome of laser surgery have increased by 117%;
2. Complaints where the consumer has been excluded from the practice have increased by 83% (however low in volume, 11);
3. Concerns with the eye examination as a main issue within the complaint have increased by 76%;
4. Circumstances where the consumer had concern regarding a clinical diagnosis also increased for a second year, rising by +40%, from a low numerical base.

Miscellaneous enquiries also increased significantly during 2019-20. Further analysis is given below.

Laser eye surgery complaints

This year, the OCCS has seen a significant increase (compared to 2018-19) in the number of complaints concerning the outcome of laser eye surgery and consumer satisfaction with how their concerns are addressed by the provider. The nature of the complaint differs from those received in previous years.

These are consumer issues, relating to expectation and understanding. While it is not for the OCCS to assess the clinical basis or commercial reasons for contractual terms offered to consumers, it is surmised that changes in the contractual aftercare periods and their implementation are likely to account for the increase.

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 in previous years. This approach is currently under review as resolution rates have decreased and timescales increased.

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:

- 8% were outside remit, either due to the consumer or practice being outside the UK or there being no GOC registrant involved (online supply);
- All the complaints were resolved via referral to the practice with advice or on 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 after care 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 interpretation of consumer law such timescales for refunds, 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 and conversations may be challenging. The OCCS anticipates complaints of this nature may increase in 2020-21.

Consumer excluded from the practice

These complaints are low in volume (11) but the OCCS has seen an 83% increase this year. These complaints involve emotive situations, where practices are seeking to protect their practice team and consumers will feel aggrieved.

The OCCS are 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 each, the OCCS resolution managers explore the trigger of the escalation. Where the consumer may have a vulnerability or a protected characteristic, mediation can support both the consumer and the practice to resolve the situation. 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 have 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 offer communication and conflict resolution insight and training to enable escalating situations to be managed at a local level.

Consumer complaints involving diagnosis or management of a clinical condition

The OCCS has seen an increase in complaints involving diagnosis and management of clinical conditions in primary optical care settings. The numbers remain low (53), but represent a 38% increase on top of the increase seen in 2018-19. Having reviewed these complaints, the OCCS has concluded these continue to be largely communication and clinical counselling issues. The table below provides further detail on the nature of the clinical conditions involved and also the outcomes of those enquiries. Where a consumer's health and, or vision is alleged to have been harmed, the enquiry falls outside the remit of the OCCS.

Condition	Refer to practice with advice	Out of remit	Advice only	Resolved on mediation	Still live	Total
Cataract	3		2	4	1	10
Glaucoma	3					3

Retinal detachment	5	3	5		1	4
ARMD	3		1	8		12
Misc	4	3	3	1	1	12
MECS/EOS	1		1			2
Total	19	6	12	13	3	

'I cannot see with my glasses' - most common consumer complaint 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 2019-20, the OCCS has seen these complaints increasing overall.

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 see 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.

Issue	Refer to practice	Out of remit	Advice only	Resolved on mediation	Live	Total
Prescription/non-tolerance	16	1	8	7	1	33
Quality of eye examination	8	5	8			21
Optical/clinical advice	2	2	2			6
Diagnosis/clinical	6	4	1	3		14
Misc		2	5			7
Total	32	14	24	10	1	81

While it is too early to say, one explanation could be a positive. Complaints of this nature would fall under the Acceptance Criteria introduced in October 2018, and therefore would now be managed through the OCCS mediation process, rather than entering FtP. Analysis of the complaints referred to the OCCS by the GOC supports this as they involve complaints in these categories, and customer care issues.

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 Macular Society. Data also

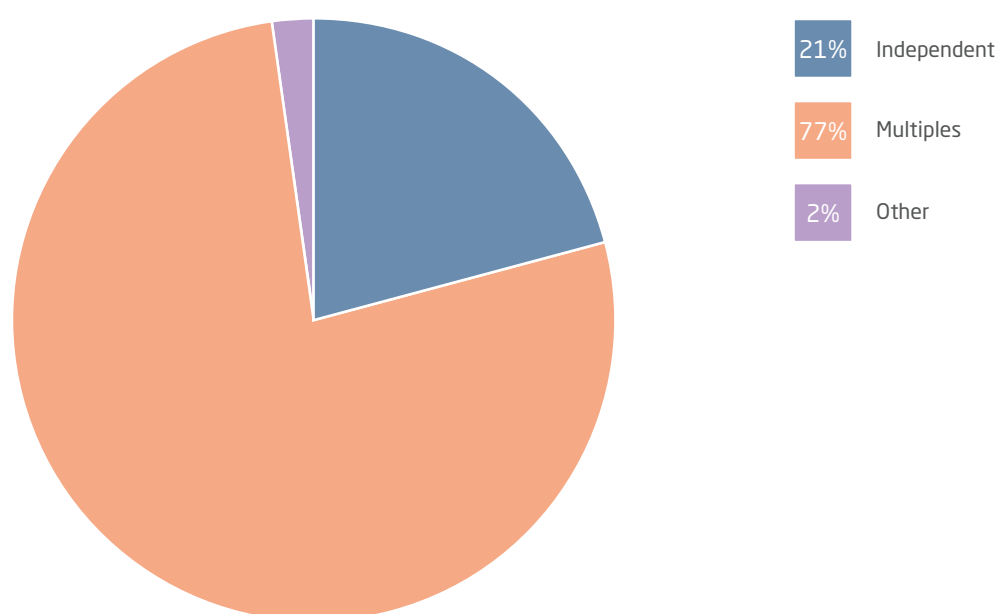
shows that all of these complaints have concluded with a resolution, further supporting the positive impact of Acceptance Criteria for consumers, GOC registrants, and the FtP specificity and sensitivity.

Prescription dispenses elsewhere

As identified in last year's annual report, the OCCS mediates complaints where the prescription issued by one 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 a more challenging economic climate, there is likely to be an increase in situations where two practices may be involved and may be seeking the other to accept responsibility.

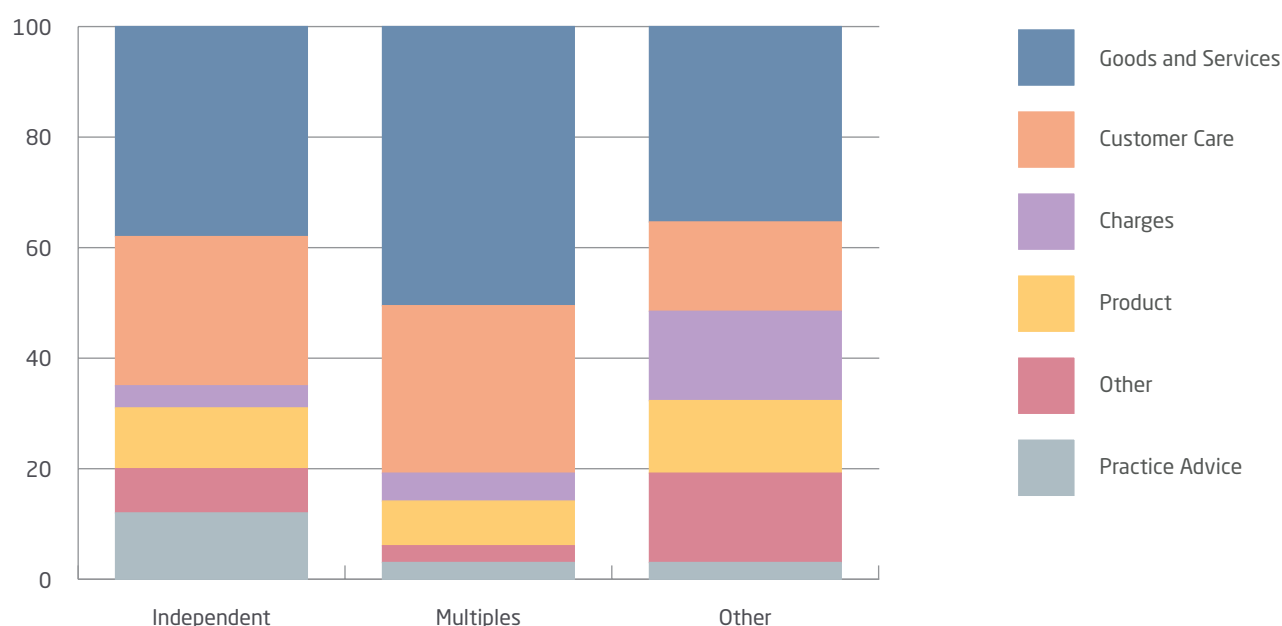
b. Who Uses the OCCS? - Service User Analysis

Fig. 8 Practice Business Types
Enquiries and Complaints by Practice Type (% of all known)



This year, the enquiries and referrals involving a practice within a multiple group have accounted for 75% of all interactions, an increase of 5% on 2018-19. This split between practices in the independent and multiples business models reflects the split in market share across the sector.

Fig. 9 Nature of Complaint by Business Type %



When looking at the nature of the complaints referred to the OCCS by practice business models, there are some key observations:

1. Practice enquiries are more likely to originate from practices in the *Independent* sector, with over 10% of referrals to the OCCS in the Independent sector being practice instigated. This is to be expected as those practices do not have a central office support team to provide guidance or handle escalated complaints;
2. Customer care related complaints in *Multiples* account for a slightly higher proportion than in other areas of the wider optical sector (30%). An area of focus for the OCCS has been insight sharing with *Multiple* providers on complaint handling as this had been an area identified as over indexed in concerns referred to the GOC FtP team. In addition to highlighting this cross-sector analysis, the OCCS has worked with providers to review complaint processes and information shared with complainants to self-triage customer service and consumer rights issues to escalate to the OCCS. The OCCS will also continue to review the impact of Acceptance Criteria on low level service complaints being referred to the OCCS for mediation. When excluding the practice enquiries, the proportion of customer service-related complaints across both areas of the sector are comparable. Consistent with previous years, complaints from different areas within the sector are referred to the OCCS at different stages. Complaints involving an *Independent* practice may come to the OCCS at an earlier stage, as they do not have the option escalating to a central support team. Complaints from a multiple service provider may escalate as they have been handled over a protracted period and further issues may arise during the complaint process. Consumers and practices may also have different emotional responses to complaints based on factors such as perception, engagement and practice loyalty.

-
3. Practices categorised as *Other* are lower in number, and the enquiries are more likely to fall outside the remit of the OCCS. As such the variance in proportions is of less complaint insight value. The analysis does however inform OCCS team training, signposting activity and consumer facing communication.

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 re-assignment

consistent with the GOC's own EDI data capture.

Response rates have increased slightly to 41.3% compared to 39.3% in 2018-19.

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 differs 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. Having reviewed the EDI data categorisation in 2019-20, it was considered appropriate to explore the optical consumer demographic data to measure OCCS activity against meaningful, relevant markers.

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

Geographical Analysis

Northern Ireland

% of enquiries: 1.8%
Population as % of UK total: 2.8%
Variance: -1

Wales

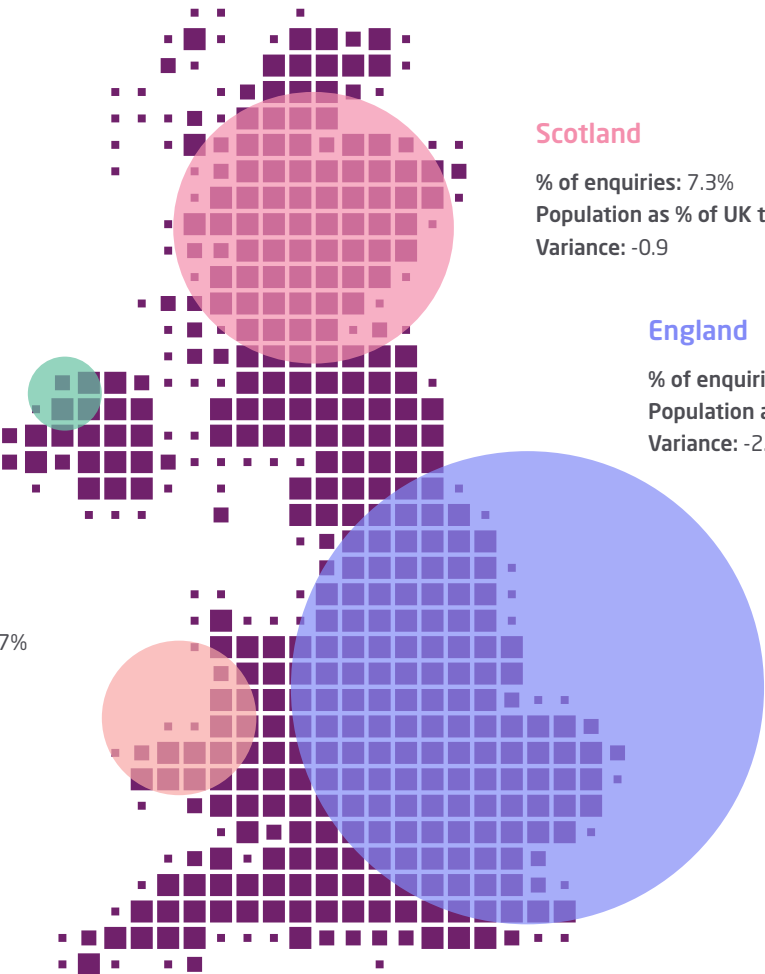
% of enquiries: 3.9%
Population as % of UK total: 4.7%
Variance: -0.9

Scotland

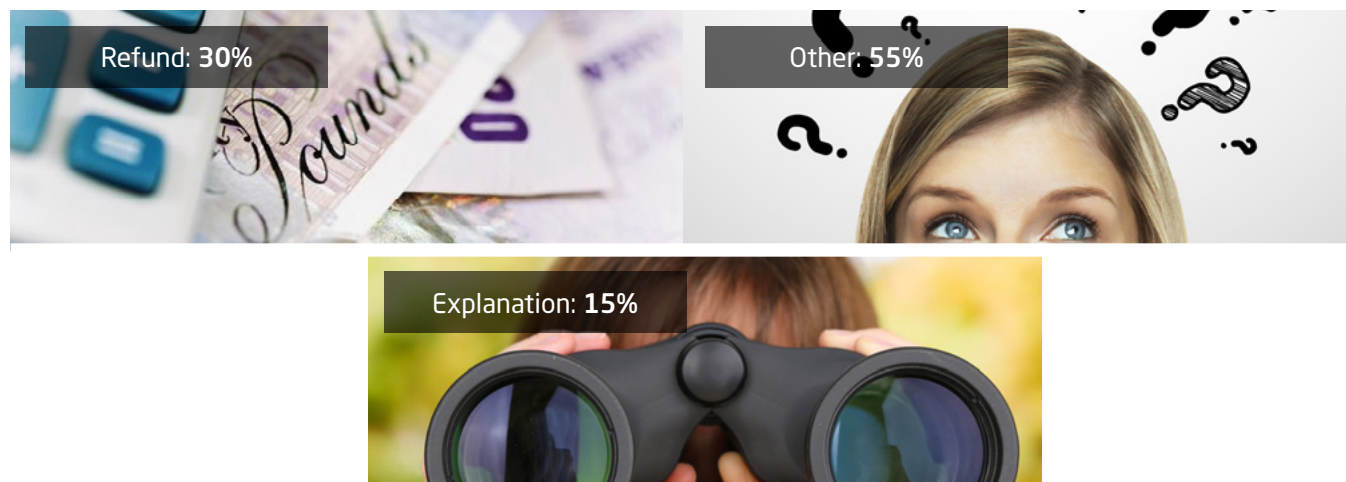
% of enquiries: 7.3%
Population as % of UK total: 8.2%
Variance: -0.9

England

% of enquiries: 87.1%
Population as % of UK total: 84.3%
Variance: -2.8



c. What Do Resolutions Teach Us?



This year, the OCCS has sought to analyse the resolution agreed in the mediations.

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

d. Insight on Future Awareness

Richard Edwards, Clinical Advisor to the OCCS has reviewed the OCCS activity in 2019-20, and shares his reflections on the areas for future focus as move into 2020-21:

'An increasingly informed and expectant population with increased propensity to challenge authority will drive up the expectations in all clinical professions. When that profession operates in a private and commercial landscape, and at a time of economic turbulence and mass unemployment we should expect increased challenge across all categories over the coming years. Last year at council we discussed in detail the rising expectations around maculopathy and I feel we would be wise to remain vigilant to this challenge. I am delighted the OCCS along with the Macular Society and Birmingham Optical group have been able to do our bit in creating new CET content in this area (see page 38 for more details).

As professional roles evolve we should also be cognisant of the potential for Local Enhanced Services to bring increased activity. To date I am delighted to say we have seen very little activity around such schemes, however, I am sure this will change as the professions' roles in managing chronic eye conditions in the community accelerates over the coming years.'

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 has kept 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. During the last month of the OCCS year, the team

sensitively handled and resolved a low number of COVID-19 related complaints, related to the collection of orders and contact lens checks. These were resolved with early engagement with the practice and a solution focused approach.

The OCCS notes the commitment and work of the optical sector in delivering emergency, urgent or essential eye care in accordance with the restrictions in place across the four nations, and helping consumers to understand the available eye care and to work together to assess their eyehealth and optical needs. As the pandemic continues to have an impact into 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, lockdown and any complaint trends arising in the coming months.

7

Impact of the OCCS

a. Proportionate Complaint Resolution - the OCCS and FtP

Public protection must sit at the forefront of complaint resolution and processes followed by the OCCS. The OCCS is a direct access service. Consumers may approach the OCCS with complaint circumstances which could amount to allegations of impaired fitness to practise. In 2019-20, these circumstances accounted for less than 0.5% of OCCS enquiries.

The fundamental purpose of the OCCS is to provide a proportionate and effective resolution process for concerns that 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 its clear objective to remodel FtP to provide an effective and timely approach to managing FtP concerns.

The OCCS input has been focused in three areas:

1. 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;
2. 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;
3. Supporting the development and application of Acceptance Criteria within opened FtP investigations as part of the remodelling of FtP, to enable the OCCS role in complaint resolution for concerns which do not progress to Committee hearings.

At GOC Council in July 2019, Council asked the GOC FtP Officers if Acceptance Criteria was expected to have an impact on activity levels at the OCCS.

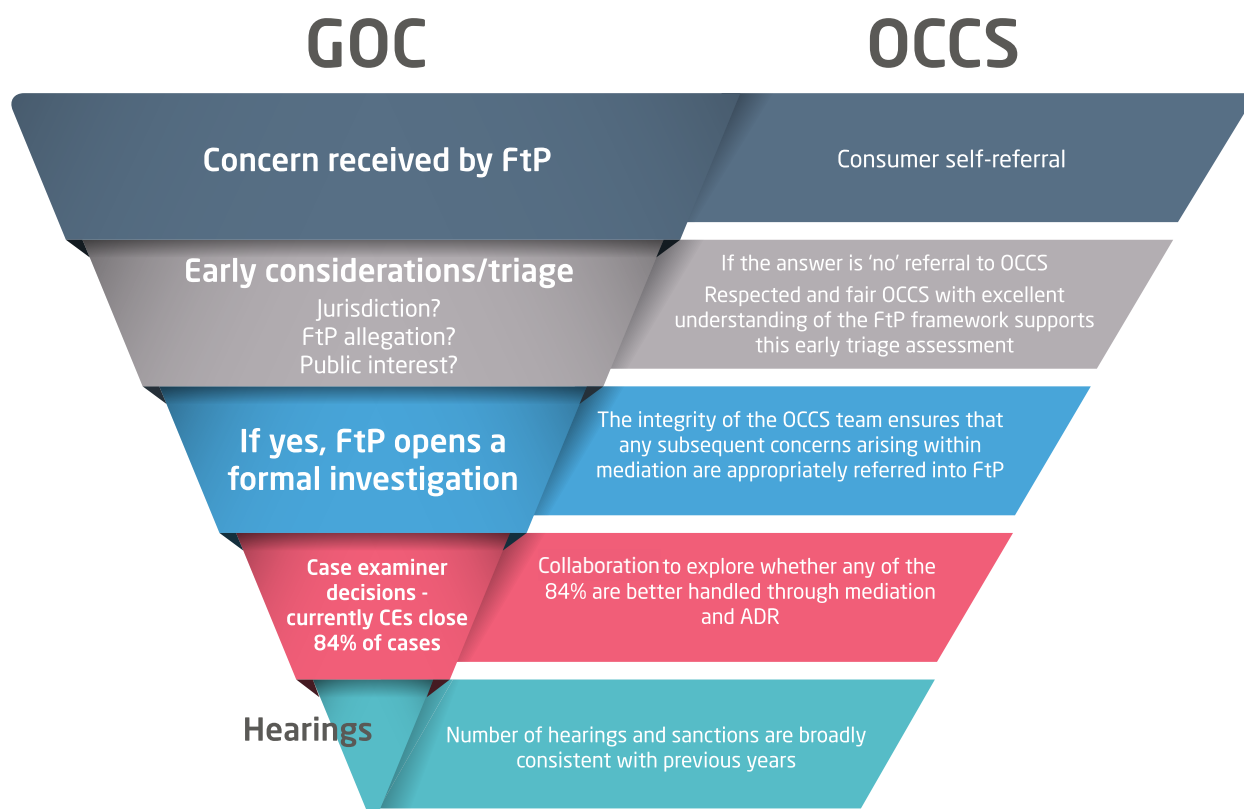
While still too early to see the full value and impact of Acceptance Criteria and a remodelled FtP triage approach on GOC to OCCS referrals, there is encouraging data showing a reduction in FtP referrals, particularly in areas of OCCS focus, such as complaint handling, prescription and dispensing concerns and single clinical incidents. This data sits alongside an increase in OCCS activity (113), comparable to the decrease in enquiries received and investigations opened in FtP (-114).

Below is an extract of data presented to Council in May 2020. The data illustrates the excellent results in FtP process and activity. The OCCS is proud to have supported the implementation of Acceptance Criteria and the remodelling of the FtP triage process, contributing by playing our part in the work to deliver timely and proportionate regulation of the optical professions by the GOC:

	2016-17	2017-18	2018-19	2019-20	Variance
GOC registrants	29,136	29,883	30,097	31,368	
New referrals	425	495	453	342	- 111
Investigations opened	293	262	269	155	- 114

Referrals to the FtPC	59	57	37	58	+ 21
Erased from the GOC register	3	5	9	13	+ 4

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



In 2019-20, this work has been delivered through:

- OCCS consultation and input on proposed operational implementation plans such as the FTP Case Progression: Performance and Process Review paper presented to Council in November 2019;
- Team-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.

Over the past 5 years, the OCCS has been developed to deliver highly effective proportionate complaint resolution. With safeguards in place to ensure serious concerns are investigated within the FtP process, the OCCS underpins the successful implementation of Acceptance Criteria and a remodelled ftP triage process. Enabling concerns to be resolved in the most proportionate and appropriate forum is welcomed by consumers, registrants, stakeholders, defence bodies, the GOC and the 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.

During 2019-20 referrals from the OCCS to FtP accounted for just 0.4% of all enquiries, compared to 2.4% in the previous year. This is an early indication of the successful implementation of the Acceptance Criteria and remodelled triage by the GOC. Noting that the number of concerns progressing to hearings, and findings of impairments have remained consistent, the OCCS and the FtP team can reassure Council, and the PSA, that serious concerns are identified and enter the FtP specificity and sensitivity. With lower level complaints capable of resolution by the OCCS, the FtP can progress FtP investigations expediently. This supports the GOC in their statutory function of public protection and the need to provide proportionate and agile regulation.

Should the team identify a potential FtP or safeguarding concern, the complaint is referred to the Head of Service and a Clinical Advisor for review. Where a potential 'red flag' safeguarding concern is identified by the OCCS team, the complaint is reviewed by the Head of the OCCS and a Clinical Advisor immediately, and where appropriate a referral made to the GOC within 24 hours. 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'.

b. Illegal Practice

The OCCS has provided information and details to the illegal practice team at the GOC during 2019-20. 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 the public.

c. Working together - the GOC and OCCS

The current Working Together Policy has been reviewed to ensure it is accurate and fit for purpose.

Further examples of OCCS contribution to GOC strategic objectives:



-
- Consultation in the development and implementation of Business Standards for Body Corporate registrants;
 - Eventure risk in optics research project;
 - 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.

d. Learning from Complaint Insight

During 2019-20, 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 the OCCS' work in the CET arena in recent years.

The OCCS has therefore worked to support the sector in a clearer understanding of complaint and regulatory risk. Complaint insights lend themselves perfectly to peer group discussion and are proving an effective vehicle to also carry the message that the regulator is evolving.

In 2019-20, the OCCS has delivered almost 50 CET sessions to thousands of registrants this year at no cost to the GOC / OCCS - all sessions were funded by the event hosts and average feedback scores continue to be in high 90 per cents.

In the last five years, the OCCS has undertaken an extensive and largely self funded programme of insight-led CET:



On completion of a recent CET session, I was approached by a delegate who thanked me for the session and said that the session should be compulsory for every registrant. He thanked me for the work we are doing to reform FtP and then shared that he had, in the past, been subject to a vexatious complaint from a family member of an elderly patient, a complaint that resulted in him being under FtP investigation for three years before being told there was no case to answer. He told me he had considered suicide a number of times in that three-year period out of sheer frustration and that the work we are doing is really important.

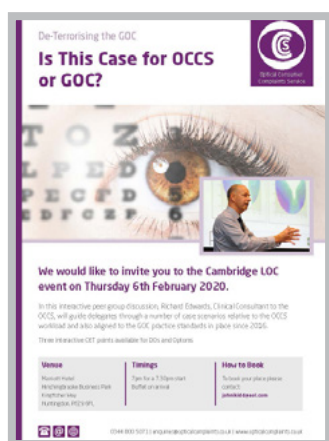
- Richard Edwards, Clinical Advisor to OCCS

To reinforce the highly collaborative work between Nockolds and the GOC, sessions on insight sharing and lessons from complaint resolution were delivered jointly by GOC officers and OCCS:

Over
5,000 registrants

in three years

Feedback of
+ 95%



- In September 2019, Dionne Spence, Director of Casework and Resolution, and Jennie Jones, Head of OCCS, delivered an awareness and insight sharing workshop to key influencers and leaders of optical academic institutions at the Essilor symposium. This event showcased the significant work undertaken to improve FtP case progression and the developments towards a more proportionate approach to complaint resolution in the optical sector;
- In October 2019 an OCCS Clinical Advisor, Richard Edwards, and Head of Case Progression at the GOC, Keith Watts, delivered a CET session together to over 500 registrants at the annual Specsavers PAC Conference in Birmingham. This session titled '*Be Safe Not Sorry*' used three redacted GOC cases to highlight key insights that drove the escalation of a complaint to an FtP matter. All attendees were asked to complete an individual action plan to capture and commit to the learning from this session

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 at professional trade fairs, large employer conferences and at the local LOC meetings. We estimate we have reached some 3,000 registrants at these events this year.



e. 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 the 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 is planned in conjunction with the Macular Society and Birmingham Optical throughout 2020, and subject to COVID-19 restrictions, planned for the rescheduled Optrafair 2020, and 100% Optics in 2021.

8 Engagement



a. Stakeholder - Optics



Stakeholder engagement remains strong. The OCCS has continued the ongoing investment in these critical relationships. Nockolds was humbly proud to receive the support and endorsement from the sector during the recent procurement process. 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 including OC Domicillary Eye Care Committee.

These sessions facilitate proactive 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.

b. Regulation

In section of 7 of this report, the OCCS has set out in detail it's work with the GOC and in particular with

the FtP team. In addition, the OCCS and Nockolds Resolution has been engaging with the wider regulation sector.

In July 2019, the government published a white paper: '*Promoting Professionalism, Reforming Regulation*'. Within the proposed reforms, the government referred to the increased use of mediation within FtP and regulation overall. Over the past five years, the GOC and the OCCS, delivered by Nockolds Resolution have led the field in developing the OCCS ADR model which meets the particular needs of regulated sectors.

In delivering the OCCS and working collaboratively with the GOC on Acceptance Criteria and the remodelling the approach to FtP, 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.

c. Consumer

The OCCS team offers the agility and flexibility 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:

Website Statistics (Apr 2014 - Jan 2020)

Sessions	Users	Page Views	Avg. Duration	New Visitors
107,046	87,687	196,046	01:19	88.6%

Five Most Visited Pages (Apr 2014 - Jan 2020)

- FAQs for Consumers (57,564 page views);

-
- Home (55,196 page views);
 - Complaints (22,601 page views);
 - Consumers (16,445 page views);
 - What We Offer (7,710 page views).

9

Customer Service Strategy

a. 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 team 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 in 2020-21 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 EDI characteristics which may mean a service user may require additional support or an adaptation to our process to ensure they are able to have their complaint heard, understood and resolved. 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 support 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.

The OCCS will use complaint and mediation insight to also support practices and the optical professions to manage difficult situations effectively and in a way that recognises consumer vulnerability and protects the team's wellbeing and safety.

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

- Implement a planned response to the website accessibility review conducted in 2019-20;
- Review and update the 'Equality, Diversity and Inclusion Support Guide';
- Conduct a training evaluation on the need and benefit of unconscious bias training for the team;
- Review EDI data categories for completeness;
- Work with the GOC, stakeholders and industry to obtain more sector relevant demographic data for comparison analysis;

-
- Develop insight led CET focused on further developing the skills and confidence to manage difficult situations and conflict.

b. 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 the review the language and content of practice and consumer correspondence.

c. 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.

The detailed objectives set out in section 2 outline the focus of the OCCS over the next three years.

d. 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 groundbreaking work in complaint mediation in regulated healthcare to lead the regulatory field.

e. 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 eyecare, 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.

f. Business Regulation

The OCCS will continue to capture data and insight to:

- Support the implementation of a reformed approach to business regulations 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.

10 Conclusion

The activity over the past year has once again shown the positive impact of the OCCS. The OCCS is made up of a committed team who are passionate about the individual mediations, and the strategic impact of the service. Having delivered more successful mediations than ever before, coupled with the fantastic work in advising consumers who are still in the local resolution phase, this report showcases the effectiveness of mediation in private healthcare complaints. Towards the end of 2019-20, the optical sector had to navigate the challenges of the COVID-19 pandemic, and the OCCS will continue to provide consumer complaint support in this area into 2020-21.

That is only part of the role of any alternative dispute resolution service. We must continue to share the insights from complaints and mediation to support the sector in understanding their consumers, aiding communication and providing optical professionals with the insight they need to meet the evolving needs of their patients. 2019-20 has been an important year of insight sharing. The OCCS focuses on complaints and escalation, helping registrants to understand how to resolve complaints and not escalate them into fitness to practise scenarios, and developing plans to invest OCCS insight in the communication and patient aspects of managing clinical conditions in primary practice. Alongside the role of the OCCS in supporting the changes in FtP at the GOC, the service is excited to continue and expand these roles during 2020 and beyond.

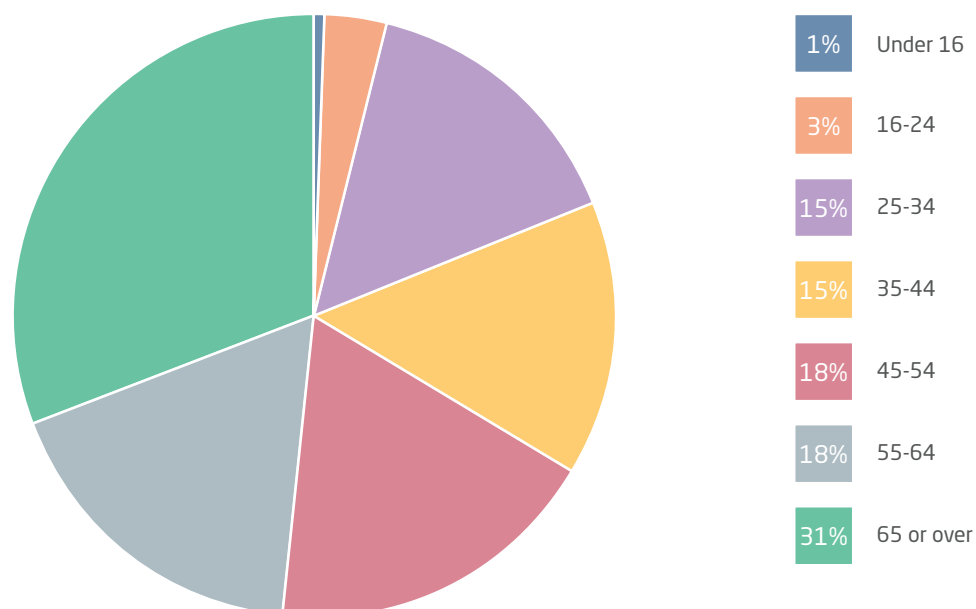
Appendix 1: Sub-Nature of Complaints

Nature of Complaint	2019-20
Goods and Service	712
Concerns with the examination	81
Dispense of varifocal	67
Dispensing	68
Error with prescription	231
Missed diagnosis	53
Outcome of laser eye surgery	102
Paediatric	2
Prescription prescribed in one practice and dispensed in another	76
Reglaze - issue with consumer's own frame	30
Unknown	2
Customer Care	438
After care	10
Alleged inappropriate selling	42
Attitude	73
Complaint handling	71
Consumer change of mind	22
Delay in supply	73
Dispensing optician customer care	1
Excluded from store	11
Failure to deal with concerns/complaint	34
Laser surgery - complaint handling	4
NHS voucher query	34
No prescription provided	26
Non-qualified staff issues	3
Optom customer care	28
Pupillary distance - entitlement	4
Unknown	2
Charges	94
Charges and offer	93

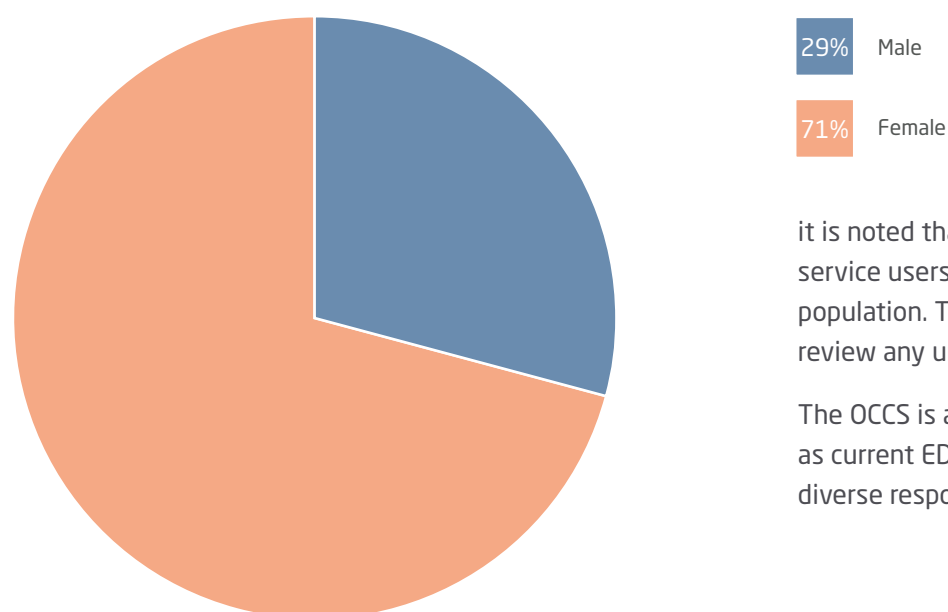
Unknown	1
Product	139
Contact lenses	4
Product - frames	90
Product - lens coating	28
Product - lenses	17
Other	125
Miscellaneous	110
Practitioner query	14
Prescription - content	1
Practice Advice	98
Unknown	98
Unknown	5
Unknown	5
Grand Total	1611

Appendix 2: EDI Data

Consumer - Age of Consumers Contacting OCCS



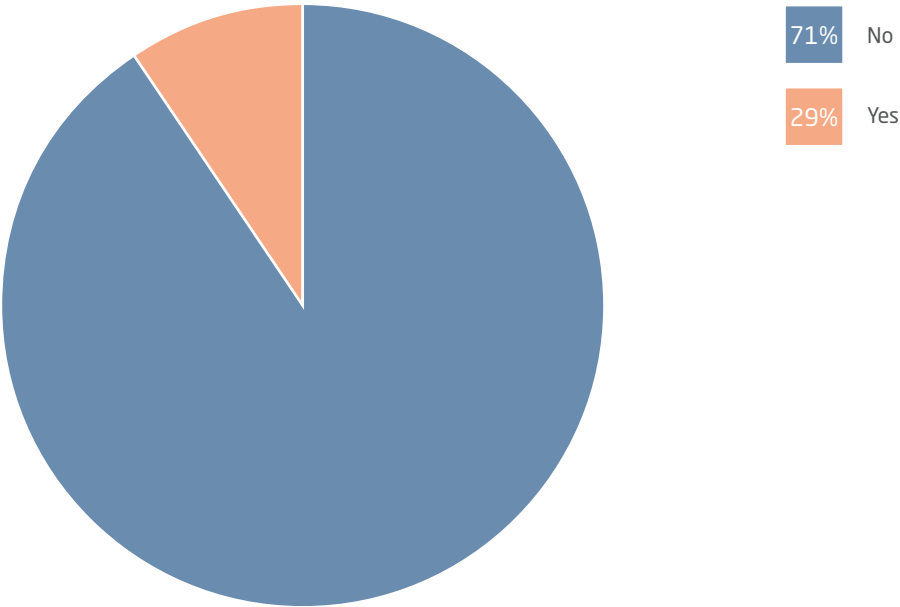
Gender (%)



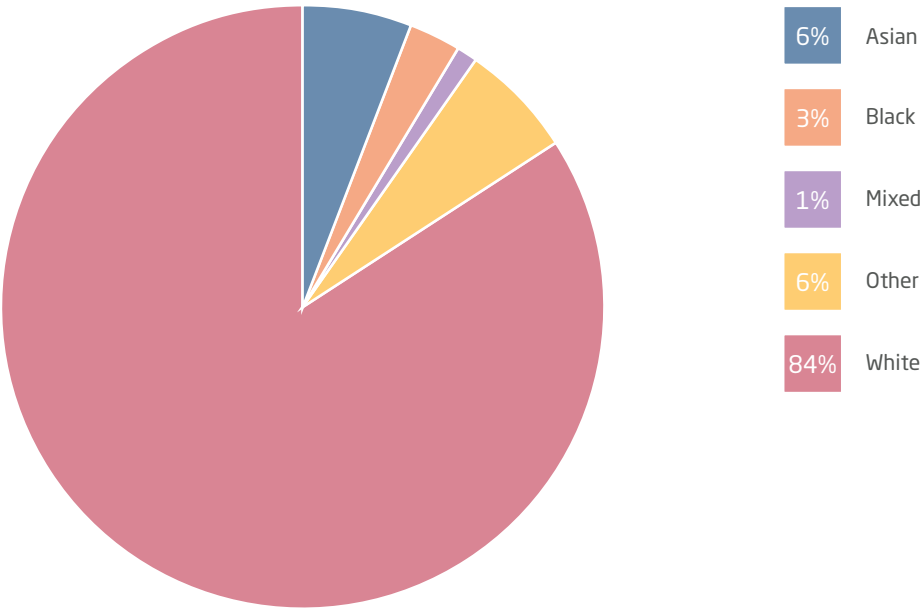
it is noted that the gender balance in OCCS service users does not reflect the general population. The OCCS will monitor and further review any underlying reason.

The OCCS is also revising the categorisations as current EDI capture needs to recognise more diverse responses and identification.

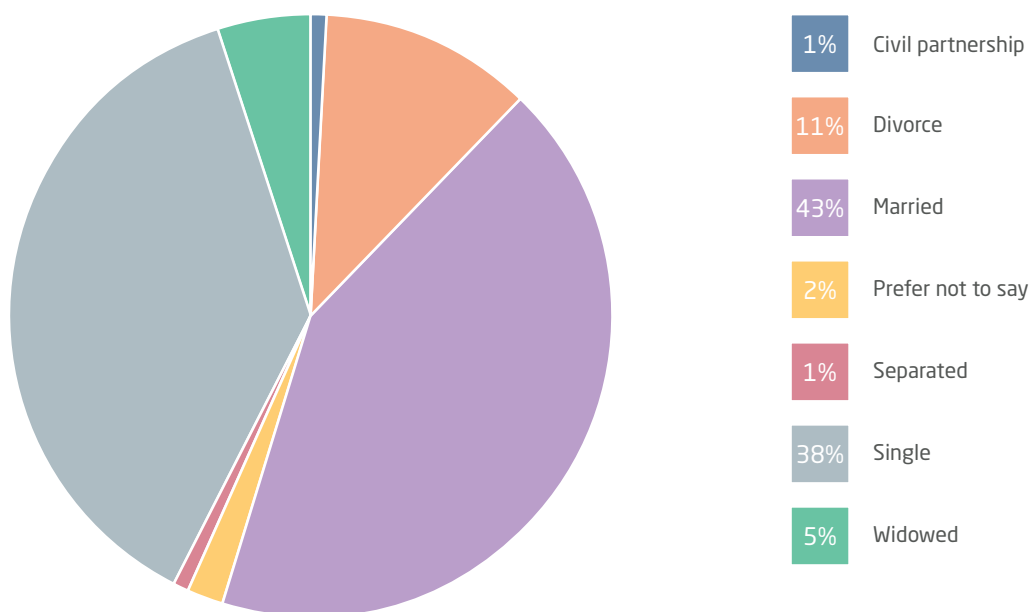
Consider Themselves to Have a Disability



Ethnicity (Consumer)



Marital Status (Consumer)



Religion (Consumer)

