

Optometry Wales

FAQs on primary eye care reforms in Wales

As set out in [our statement of 28 April 2023](#), Optometry Wales (OW) is taking this opportunity to respond to some common frequently asked questions (FAQs).

Context

OW, Welsh Government (WG) and NHS Wales are transforming NHS eye care in Wales to improve access from the patient's perspective across primary, community and hospital eye services in Wales. A key driver for change is the need to alleviate pressure on secondary care through increasing the range of services delivered closer to home by eye care practitioners.

The goal is to help support better self-care, prevention and early intervention. In turn we will hope to see expanded scope of practice for optometrists, dispensing opticians and support staff, and fairer NHS fees. Most importantly if we succeed, we will all be able to prevent avoidable blindness currently being caused by unacceptable delays in the hospital systems. This will be a fantastic achievement.

OW stands fully behind these goals as do providers and practitioners throughout Wales, and OW thanks everyone who has been working behind the scenes on these reforms, the original papers and now the five working groups as part of the implementation process being overseen by the Optometry Contract Implementation Board.

We have all welcomed the opportunity to provide more care closer to home and to pay providers appropriate new fees for clinical work. Nevertheless, many of you still have questions about the detail of what providers will have

to do, about how some fees have been derived, and how and why OW agreed to the proposed voucher values at the time.

While negotiations were confidential, this public consultation has given us an opportunity to hear more about how the proposals will work in your area, in your practice and most importantly for your patients. The OW Board wants to take this opportunity to reassure everybody that we are listening, capturing all feedback and will be discussing it with Welsh Government within the context of very strong support for the overall reform package which we hope very shortly to see across the line for Welsh patients and the sector. Once finalised, this will be a major step forward for Wales and one the professions fully support.

We all recall [Future Approach for Optometry Services](#), the joint OW and WG September 2022 webinar and FAQs of October 2022. Together these set out the vision and detail of plans. At that stage the anticipation was that the full pathways and clinical manuals would be available to the professions in December 2022. As with many complex reforms however, this has taken longer than expected. We do not criticise this as it is important to get the detail right, and we continue to work in partnership with WG and NHS Wales to achieve this. In these FAQs we provide further detail to help answer the questions you have asked.

Many of you have highlighted to us the significant amounts of staff training which is likely to be needed to implement the reforms and that this cannot be done overnight. In the spirit of long-term partnership working with Welsh Government and NHS Wales, therefore OW will seek to agree sensible and sustainable implementation processes and steps so contract reform is a success for everyone.

This will be linked to our role in representing the professions at Wales National Contract Reform Implementation Board and we will disseminate further information as this evolves.

The OW Board has also heard your strong views on proposed changes to the voucher values and domiciliary services that Welsh Government, NHS Wales and OW signed up to on an in principle basis last summer. You have told us that we got this wrong with respect to vouchers and domiciliary care and, after listening to your expertise, we accept that. We have told the Welsh Government we made mistakes here and will do our best to resolve them. Please continue to feed in your views on this or any other aspect of the reforms through your ROC, OW directly, or your membership body. This will help ensure all voices are heard and that we have all done what we can to get things right for the patients we serve, to deliver change together.

The consultation

As you know, Welsh Government is now carrying out a high-level consultation on the reforms and this is therefore the last major opportunity to help us get the detail of this right prior to legislative change and implementation.

This is why it is important that the impact that these changes (which were agreed in principle as a whole package) will have on your practices and patients are also considered in their entirety, and that you flag any issues with OW and Welsh Government in response to the consultation. In this way you will help ensure the reforms deliver, as intended, a world beating eye care service for all the people in all parts of Wales whether they access services in fixed premises or through mobile practices.

To guide you in this process we have prepared, as promised, the following answers to the most frequently asked questions.

1. What are the timescales for this consultation, how can I respond, and will my voice be heard?

The Government consultation runs until 19 June 2023 and responses should be [submitted online or by post](https://www.gov.wales/proposals-reform-ophthalmic-services-delivered-primary-care-wales)<https://www.gov.wales/proposals-reform-ophthalmic-services-delivered-primary-care-wales>. The Government will consider all responses and will normally publish an overview of responses.

The consultation is high-level, and principles based, but you can still highlight any areas that you have a specialist interest in, whether to support or share any concerns. Your ROC, OW or your representative body (ABDO, AOP, FODO; contact details are included at the end of FAQs) will be able to help with this if necessary.

2. Why is information from OW coming out so late?

We apologise for this. There have been some changes in the team and since Welsh Government opened its official consultation, we have been listening to all feedback, both positive and more critical, and working on how to best reflect and address this honestly and fairly.

Throughout the whole reform process, OW has done its best to keep providers and practitioners in Wales up to date through ROCs and FAQs and by responding to direct requests for information. We will continue to do that. The clinical manuals will include full details, and OW continues to work with WG and NHS Wales to finalise these, but these are not yet ready to share.

Please do read these and previous FAQs and continue to work through your ROC, OW or representative body if you have outstanding questions.

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As always, we will continue to work in partnership and good faith with Welsh Government and NHS Wales - in robust dialogue and discussion but

joint enterprise as the Minister said - to get these reforms right for patients, the NHS and the sector. We hope these FAQs are helpful and show we are capturing your feedback.

3. Where can practitioners find out more information?

We hope most issues are covered here and in the information previously provided. We do now have permission to share with you the 23 background papers. There is a lot of material and much of it is more suited to clinicians rather than wider public audience but if you would like to see them, please email: queries@optometrywales.com.

Once the consultation is over, we will also be running seminars with Welsh Government to discuss the agreed way forward as originally planned.

4. Are OW still backing the reforms?

Yes, there is no question about this. The primary eye care reforms have our full backing on the basis we have set out in these FAQs. Optometrists and dispensing opticians have so much more to offer in terms of clinical skills, equipment, facilities and care closer to home. Making greater use of these for the people of Wales has been a long-standing aim since the PEARS scheme was first set up at the turn of the Millennium. Indeed, there is no logical alternative if we are to reduce pressure on ophthalmology and prevent avoidable blindness caused by hospital backlogs both now and in the future.

Our aim is simply to get the details right in response to the consultation so that the reforms deliver as intended for all patients in Wales in all locations. Taking time to get things right now will reduce any possible future problems.

5. I have been told we should not ask questions or challenge anything as this would result in Welsh Government not going ahead with reforms, is this right?

No. Welsh Government are committed to these reforms as is NHS Wales, OW and the professions. In fact, all parties are committed to sensible, safe and properly funded reform. However, the reforms are complex and your feedback is important to ensure we get all aspects right.

The Welsh Government is keen to hear your views. Minister [Eluned Morgan MS](#), has said on the record that the Welsh Government has benefited from “robust dialogue, discussion, and collaborative working” and that it is important to continue this “collaborative approach over the upcoming months in our shared endeavour to further improve services for people with poor eye health and deliver against the objectives of the Future Approach for Optometry Services in Wales.”

It is therefore important to share your views in a constructive way, helping us all achieve the shared vision of improved access to eye care and reduced cases of sight loss due to delays in hospital care as intended. Put simply, we all want to get this right for the patients we serve.

6. To analyse the feasibility of proposals we need more detail about what is expected, when will this detail be published?

The top-level detail is available and the 23 original papers, developed through Wales National Contract Reform Group, (see FAQ3).

In the meantime, much has moved on and the new clinical manuals are being refined in readiness for the final versions to be disseminated to the professions across Wales when they are ready. The detail in these manuals will be consistent with these and past FAQs and the joint OW/WG webinar on reforms last September.

We appreciate the deadline to respond to the consultation is 19 June but you will be able to contact us over the weekend by emailing queries@optometrywales.com. ABDO, AOP and FODO will also be available on the 17th and 18th to help if you have any final questions.

Please answer the consultation questions as best you can to show your support and also to help Welsh Government get the detail right for everyone.

7. What has been agreed so far?

- Welsh Government, Optometry Wales and NHS Wales have been working through these complex reforms for some time.
- 23 papers outlining broad proposals were produced by the Welsh Government Optometry Contract Reform Group between March 2021 and April 2022. This was a multidisciplinary stakeholder group of which OW was a member and led on producing a number of papers. [L L L]
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- The agreed 23 papers formed the mandate for tripartite negotiations between the Welsh Government, Optometry Wales and NHS Wales which took place between April 2022 and July 2022. An agreed position was reached and confirmed in writing by all parties (WG, OW and NHS Wales). This was followed by a Ministerial statement in September 2022. [L L L]
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- The recommendations from each of the 23 papers have since been considered by groups led by Welsh Government which Optometry Wales and other key stakeholders attend. An Optometry Contract Implementation Board has also been set up on which OW is represented. Its role is to ensure that recommendations are not

added or removed and that the reforms are implemented to agreed timelines.

- The plan is for the agreements in principle reached in negotiations last summer and announced in the Ministerial statement in September, subject to this final consultation, to be worked up into new WGOS clinical manuals, as currently for EHEW and LVSW for example, with accompanying standard operating procedures (SOPs). 
- OW has a seat on the clinical implementation groups and are working with NHS Wales and the WG to ensure that the clinical manuals will be available as soon as possible.

To recap the information provided at the September OW/WG webinar and in the October FAQs:

- Level 1 WGOS resembles the current GOS sight test. Prevention and wellbeing (making every contact count) advice and a patient management plan will be new elements. For much of the profession what will be covered with the patient management plan will not be new or different - what will be new is that we will expect some information to be recorded. You can also now review paper 3 from the contract implementation group (email queries@optometrywales.com).
- Level 2 WGOS will be current EHEW 1,2 and 3 services. All contractors will be expected to provide this service and the combination of Levels 1 and 2 will become the new baseline service.
- Level 3 WGOS will be the low vision service. The main change will be opening up the service to more practices who wish to offer it.

- Levels 4 and 5 will be new services. Level 4 for further referral refinement and additional monitoring of patients. Level 5 for IP to take on a more complex caseload, helping further reduce pressure on hospitals.

8. I am concerned about the viability of domiciliary eye care services, what is being done to protect and advance patient access?

OW undertook negotiations with WG with the goal of expanding services available to people who depend on care at home and the agreements in principle deliver this.

All parties support the principle of offering Level 2 WGOS to more patients as a major step forward for patient equality and the profession.

There is also been unqualified support for Wales leading the way on removing notification requirements for patients that depend on care at home. This was always inequitable and this change is a major step forward in addressing this longstanding unfairness. Welsh Government is to be applauded for leading the UK on this issue.

In fairness, however, and perhaps again as a result of misunderstandings about confidentiality, domiciliary providers were not given the chance to support the OW negotiating team as they could have been. We apologise for this and also that subsequent concerns were not given the consideration they should have had when first raised.

The Optometry Wales Board has received a letter in some understandable desperation and frustration from the sector Domiciliary Eyecare Committee (DEC) on behalf of Welsh domiciliary providers setting out the concerns first raised by Welsh domiciliary providers last year and offering suggestions on a way forward.

We want to reassure all domiciliary providers that your feedback on these issues is very important. We will be responding to DEC as soon as possible and encourage all domiciliary providers in Wales to contact DEC via their representative body or OW direct so that all further feedback can be collated and shared:

- ABDO members should email: mhalford@abdo.org.uk
- AOP members should email: policy@aop.org.uk
- FODO members should email: healthpolicy@fodo.com

9. Did the costing exercises include a cost analysis of providing domiciliary eye care or an impact assessment on those services in Wales?

As set out in FAQ 8 we have tried to achieve major leaps forward in equality in access for patients throughout Wales who depend on care at home and we thought we were achieving that. We have now heard serious concerns from providers about feasibility when the principles are applied. We will be raising them as part of the current consultation with Welsh Government. We are sorry domiciliary providers were not involved earlier at the negotiation stages.

OW is made up of clinicians, and as clinicians, we will always accept if we have made a mistake and acknowledge this openly. This is at the heart of a safety culture which we in primary eye care all support. Please do feel confident that, if you share your concerns, we will take these seriously, especially when they impact on patients.

10. We have read most vouchers are increasing and also heard most are reducing. What is actually being proposed here?

The shared vision for eye care developed with stakeholders since 2019 was clear that a whole system change was needed to deliver eye care fit for the 21st century in Wales with more care delivered through primary care and fairer fees. We know that providers and practitioners throughout Wales very much support that vision.

The OW negotiating position aimed to take this vision of whole system change into account with the focus firmly on the delivery of expanded and properly remunerated clinical services.

As part of the negotiated outcome, significant clinical fee increases were agreed and new voucher bands were proposed at the highest prescription ranges to helpfully improve support to those patients.

However the Welsh Government [statement to the BBC](#) in December 2022 that 'most vouchers have actually increased' has resulted in confusion.

As we know, Welsh Government plans to introduce new voucher bands and, as a result, it is factually correct to say that, when measured by voucher band, most voucher bands will increase.

However, as the [impact assessment](#) shows, most voucher entitlements, when measured by the number of eligible patients, will fall in value. The most common bands A, B and E and other vouchers will all reduce in value.

In practical terms this means that 98% of vouchers claimed by patients will reduce in value if current plans go ahead. For example, Welsh Government will be spending £3.5m less on A vouchers and £845,000 less on E vouchers and in addition, other vouchers will reduce. In contrast, voucher values that will increase will result in an additional spending of £281,000. Overall, we estimate that proposed changes to vouchers would see £4.8m less going to support patients in need.

Welsh Government plans to invest an additional £30m annually into primary eye care services to bring optometry into fairer alignment with the other primary care contractors in Wales, and that is very welcome. OW and WG also discussed voucher values at length and, at the time, the OW team felt that the overall proposal from WG was deliverable.

Since then, we have heard from you and understand that some of our working assumptions on vouchers may not have been right and further analysis is needed. We will aim to do this on your behalf with Welsh Government.

11. How have the proposed voucher values been derived?

The negotiations with the Welsh Government and NHS Wales were conducted in good faith under conditions of confidentiality with a view to facilitating a whole system change and securing the best outcomes for patients and the profession across Wales, as well as sustainable services along the whole eye care pathway for the future.

We understand that there are concerns about how the proposed new voucher values were derived and have asked for sight of the cost analysis underpinning this. This was discussed at length during the negotiation process and OW did agree to the deal as set out in the consultation document as part of bringing significant new investment and fairer fees into primary eye care for the first time on this scale.

However we have now heard feedback about how OW analysed vouchers and your challenges about our working assumptions. We acknowledge that we need to do further work here and that we had not fully considered some of the unintended consequences at the time.

We also note concerns about the plans to legally oblige practices to provide spectacles within new voucher values and the impacts this might have on quality and on meeting patients' needs. We apologise for not consulting more widely and for not therefore getting this right at the time.

Please continue to share your views and insights with us so we can analyse them and share feedback in a constructive way with Welsh Government. Through the ROCs, we will always do our best to ensure we communicate your evidence, feedback and vision to Welsh Government in a constructive way.

12. I serve a community with a large proportion of people on benefits, my practice will be worse off compared to a practice serving more affluent populations; why?

When OW agreed the overall deal in summer of 2022 we had based our thinking on information available at the time. That phase of the negotiation was also confidential. Since then, we have learnt a lot from your feedback about unintended consequences of some of the proposals.

These include in more detail how the changes to vouchers might impact on some groups of patients and some types of practices more than others. We also note how the changes to domiciliary care may further impact some patients. We will need to discuss all of this further with Welsh Government.

13. How will the legal obligation to provide a basic pair of spectacles work in practice, and how will an increase in breakages and complaints be dealt with?

This is a specific question that is being asked in the consultation for the first time (see question 18 in the public consultation). As the whole system

package has been negotiated, this has seen clinical fees increase substantially and voucher values change as described earlier.

Previously, optical vouchers have been a contribution towards the cost of an optical appliance without an obligation for providers to make available an appliance within the cost of the optical voucher if that is not possible.

Welsh Government are consulting on a change to the system which would mean that practices providing services will have to provide a basic appliance within the costs of the optical voucher. It was hoped it might be possible to do this so that patients on low income could obtain a pair of spectacles without having to contribute to the cost. We have since captured the complexities around these proposals and will share these with Welsh Government.

OW has in the meantime confirmed with Welsh Government that this does not affect the options for patients to upgrade and pay more for better quality frames and lenses, but that a basic appliance will need to be available for patients to access at no additional cost under these proposals. It is universally accepted that the levels of choice and quality are likely to decrease but this is seen as a known trade off as part of wider reforms by WG.

We have heard from practice owners that it may simply not be possible to provide a quality frame and lenses to key patient groups under the new proposed voucher values for prescriptions falling under A, B, E and F categories.

Many of you have also expressed concerns about increased breakages as a result of downgrading the options available to children and adults on means tested benefits. Welsh Government has confirmed that the current repair and replacement system will remain in place although the repair fees will also be adjusted as per changes to voucher values. The concerns

raised to date centre around cheaper frames not having the same supply chain systems, which will make it difficult to cover the costs of repairs within repair voucher values.

OW also notes your concerns that this proposal might result in increased complaints as more people feel forced to 'top up' to access the quality of optical appliances they have become used to.

We will be feeding all of this back on your behalf.

13. What is the planned level of new investment in primary eye care?

This is very good news for providers and a major step forward in paying fair fees for clinical services and making better use of the skills, equipment and local facilities in primary eye care. We very much welcome these changes which will help NHS Wales meet growing need whilst reducing pressure on the hospital eye service and preventing blindness on hospital waiting lists.

At present £43m is spent on primary eye care services each year. However, Welsh Ministers have agreed additional investment of £30m a year into primary eye care working up through £15m in 2022/23 £25 in 2023/24 to £30m in 2024/25. This will be in addition to the existing budget of £43m per year. This is very welcome investment in primary eye care services and a clear sign of Welsh Government's commitment to the future of the professions we have long sought.

A message from the Board

The Optometry Wales Board would like to thank all of you who have already sent in feedback and questions and made your views known at ROC meetings. A sincere apology to those who feel their views and

knowledge have not been heeded. As noted above, it is important that everybody feels comfortable and confident to speak up and share their views on proposed reforms as part of this consultation. We encourage you to get actively involved through Optometry Wales and sector partners in Wales by emailing:

- OW queries@optometrywales.com
- ABDO mhalford@abdo.org.uk
- AOP policy@aop.org.uk
- FODO healthpolicy@fodo.com

Thank you in advance for your support and forbearance as we work with Welsh Government on your behalf to get this right for everyone in Wales - practices, practitioners and patients alike. Once again and in case of any doubt, the professions in Wales, as represented by OW, stand fully behind these reforms and are very proud of the leadership Welsh Government has shown. We have heard the overwhelming support for the contract and the goal to stop unavoidable blindness by helping to reduce waiting lists. It is just important to resolve a few small but crucial issues before implementation.