



Llywodraeth Cymru  
Welsh Government

## **Welsh Government Integrated Impact Assessment Summary**

**Title of proposal: Reform of primary care ophthalmic services: Integrated Impact Assessment**

**Department: Health and Social Services**

**Minister responsible: Minister for Health and Social Services**

**Start Date: 24 April 2023**

**For further information:**

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**This document is also available in Welsh: [hyperlink](#)**

## What action is the Welsh Government considering and why?

The Welsh Government is committed to reforming the provision of ophthalmic services in Wales and is consulting on proposals to update the current regulations to improve access to eye health services in primary, community, and hospital eye services (HES).

Eye health care systems in Wales already have people at the starting point of decisions and health professionals are centred on what is best for the individual. Delivering on our ambitions for better access and improved quality means listening and valuing the voice of health professionals.

The changes to the legislation that oversees optometry services in Wales will permit the Welsh Government to strengthen the voice across optometry health services nationally, strengthening optometrists' engagement, support and clinical care of individuals' eye health and influence treatment and ongoing care to support the drive for higher quality optometry services.

The proposed changes to the legislation is a key enabler of the [NHS Wales Eye Healthcare: Future Approach for Optometry Services](#) which maps out the Welsh Government's expectations for delivery of eye care services over the next decade.

Demand for ophthalmic services in Wales is predicted to increase significantly over the next 20 years linked to an increasingly elderly patient cohort and increased population. This data source is from the Royal College of Ophthalmologists, the College of Optometrists and Third Sector. The emphasis for all eyecare services must be on achieving earlier detection of eye health problems to help reduce preventable sight loss. Estimates set out in the Welsh Government's *Future Approach for Optometry Services* suggest that in half of cases reported, complete sight loss could have been avoided, emphasising the importance of early intervention and prevention.

Moving the delivery of some eye care services from hospitals to primary care optometry, where there is a skilled workforce with the capacity to meet the predicted substantial increase in demand, represents the most viable and sustainable solution.

The key proposal is to expand the eye health services delivered on the high street by optometrists. Currently, the core service delivered by optometrists is NHS sight tests, with some optometrists delivering additional services under separate arrangements. We propose to expand primary care ophthalmic services so that all optometrists provide a wider range of services under standard arrangements. In addition to sight tests, all primary care optometrists will provide eye examinations to patients with an eye problem needing urgent attention or those at higher risk of eye disease. The NHS sight test will also include prevention and health and well-being advice, patient self-care, and the development of an individual patient management plan.

In recent years the eye care sector in Wales, supported by the Welsh Government, has evolved significantly and practitioners have the capacity and skill set to diagnose, treat, and manage more patients in primary care. A key driver for the changes is the need to alleviate pressure on secondary care HES, through increasing the range of services delivered closer to home in primary care. The new eye care pathways proposed, as detailed in the consultation document, aim to reduce the number of referrals into HES by approximately one third with increased monitoring and management of low and medium risk patients within primary care, whilst maintaining specialist oversight in HES.

In addition, through increased monitoring in primary care, more follow-up appointments can be released, increasing capacity in hospitals with consequent savings in terms of healthcare time and costs at secondary care. There will be some increase in Welsh Government costs due to delivery of improving services and the Welsh Ministers have agreed funding in 2022/23 of £15m, 2023/24 of £25m and £30m in 2024/25. This will be in addition to the existing budget of £43m per year to invest in and deliver the transformed NHS Wales General Ophthalmic Service.

The Welsh Government has worked with stakeholders on the proposed reform to ophthalmic services and in doing so has considered current service provision, access, and quality. An Optometry Implementation Board and associated subgroups has been established to further develop proposals for the detailed requirements. The Board and its related subgroups have met regularly since being established and membership consists of NHS Wales Local Health Boards, Community Health Council, NHS Shared Services Partnership, Primary Care (Optometry) leads, and Welsh Government staff. The Board has made a significant contribution to the development of the Welsh Government's policy on ophthalmic service reform. As part of this process the Welsh Optometric Committee have produced the report [Optometry: delivering 'A Healthier Wales' 2021 to 2031 | GOV.WALES](#) which supports Future Approach for Optometry Services.

The regulations will be made under the Senedd's negative procedure for making subordinate legislation (in accordance with section 203(4) of the 2006 Act) which will involve the following:

- Revoking and remaking with changes the National Health Service (General Ophthalmic Services) Regulations 1986, and the National Health Service (General Ophthalmic Services Supplementary List) and (General Ophthalmic Services) (Amendment and Consequential Amendment) (Wales) Regulations 2006, and;
- Amending the National Health Service (Optical Charges and Payments) Regulations 1997.

It is also proposed to revoke and remake with changes the Eye Health Examination Service Committee (Wales) Directions 2016 and the Low Vision Service Committee (Wales) Directions 2016 and to update their accompanying clinical manuals as part of these reforms.

A Regulatory Impact Assessment (RIA) has been completed alongside this proposed reform. The RIA provides an assessment on the likely costs, benefits and risks associated with the legislative changes. An analysis of the benefits demonstrates that the proposed changes will pave the way for a more modern, agile and patient centred provision of Ophthalmic Services in Wales.

## Conclusion

### 1. How have people most likely to be affected by the proposal been involved in developing it?

The Welsh Government began a series of meetings and workshops in Autumn 2019 with the aim of scoping what the future of eye care services should look like from a patient's perspective across the primary and secondary eye care pathways in Wales. Stakeholders included community health councils, local health boards, representative bodies of optometry and dispensing opticians together with representation from ophthalmology, orthoptists and ophthalmic nursing.

Thereafter, the Welsh Government continued to bring together these key stakeholders in the delivery of eye care from across Wales to work in collaboration to agree a national approach, which resulted in the publication of the *NHS Wales Eye Healthcare: Future Approach for Optometry Services* document. The document set out the Welsh Government's expectations for delivery of eye care services over the next decade.

In addition, these proposals are subject to a public consultation commencing on 24 April 2023 ending on 19 June 2023 which sets out the detail of the Welsh Government's intention to reform the delivery of primary ophthalmic services in Wales. This Integrated Impact Assessment will be informed further by the responses to the consultation exercise. The consultation is actively seeking the views of health boards, persons who provide or may apply to provide NHS ophthalmic services, persons who assist in the provision of ophthalmic services or may apply to assist in the provision of such services, professional bodies with an interest in NHS ophthalmic services, as well as other stakeholders, service users and the wider public.

Specific questions have also been included within the consultation document to assess impact on the Welsh language which will further inform a Welsh Language Impact Assessment being developed in

alignment with this reform and to be finalised following the responses to the consultation exercise. In addition, questions are being asked requesting feedback on our proposed actions intended to empower people with protected characteristics. Please see our *Children's Rights Impact Assessment (CRIA)* and our *Equality Impact Assessment (EIA)* which provide a more in-depth evaluation of the benefits anticipated for people with protected characteristics in addition to the wider public more generally.

The proposals outlined in the consultation document are delivering against the actions outlined in the [NHS Wales Eye Healthcare: Future Approach for Optometry Services](#) which was established in collaboration with key stakeholders responsible for eye care provision.

## **2. What are the most significant impacts, positive and negative?**

From the public's perspective, the impacts identified and brought about by the proposals are:

- Improved timely access and reduced waiting times for individuals requiring specialised services in secondary care HES.
- Improved timely access to 'sight testing', holistic eye health examinations and eye health treatment and management in primary care.
- Patients will access enhanced eye care services within primary care optometry practices close to home.
- Only patients who require specialist eye services will be seen in hospital.
- Improved timely access for patients with eye pathology that could cause irreversible permanent sight loss, due to the reduced demand on HES.
- Improved alignment with the other contractor professions of current and new core terms of service for prevention and well-being support for individuals in primary care i.e. sign posting to other health and social care professionals for ongoing health and well-being support.
- Up-skilled primary care workforce to work at the top of their licence and to also provide shared care across the whole of primary and secondary care and all patient eye care pathways.
- A reduced reliance on the sale of spectacles and contact lenses will improve the experience and outcomes for patients accessing primary eye care services.
- Legislative changes will ensure that an optical appliance is available and provided free of charge to an eligible patient through the optical voucher system.

From an Optometrist's perspective, the impacts identified and brought about by the proposals are:

- Enablement to utilise full professional capability in the delivery of eyecare at primary care level.
- Optometrists are an integral part of the transformation of eye care services, with the skills to deliver 'sight testing' and 'eye health examinations' in primary care.
- Practitioners have the capacity and skill set to diagnose, treat, and manage more patients in primary care, providing care close to home and improving patients' access to specialist eye care services in a timely manner.
- The focus on health and well-being advice and patient self-care aligns Optometry with NHS Wales General Medical Services, Dentistry and Pharmacy providing consistency across primary care professions.
- All of this is underpinned through a programme of high-quality education and skills improvement aligned to continued professional development, reflective practice, and mentoring.
- The new financial package underpinning the reform alleviates the retail cross subsidy that has been in place since the mid 1980's and replaces it with a significant increase in remuneration for the optometry profession to deliver clinical services and to thrive in a clinical environment with appropriate remuneration. In short optometrists will be paid more appropriately for their clinical work, replacing the reliance on retail sales of appliances to subsidise the cost of clinical services.
- This will require a change in the business model for optometry practices which will require a period of readjustment.

- As mentioned previously a RIA has been developed alongside the proposed reform of primary ophthalmic services, including any impact on Opticians / Optometry Practices.

As these proposals are subject to a public consultation commencing on 24 April 2023 ending on 19 June 2023, any impacts identified by the consultation exercise will be given full consideration and incorporated within the Integrated Impact Assessment to further inform both the legislative and decision-making process.

### **3. In light of the impacts identified, how will the proposal:**

- **maximise contribution to our well-being objectives and the seven well-being goals;**
- and/or,**
- **avoid, reduce or mitigate any negative impacts?**

The reform of Primary Ophthalmic services plays an important part in supporting the general principle of the Well-Being of Future Generations (Wales) Act 2015 which is about making positive interventions now in order to benefit people living their lives in Wales in the future.

The policy contributes towards the Act's Well-Being goals, particularly those relating to:

- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities

The reform supports the Wellbeing of Future Generations' five ways of working as follows:

- **Long Term:** The Welsh Government is committed to leading eye care reform clinically from a patient centred perspective, and Wales is the first UK nation to fully embrace clinical services in optometry primary and community care, founded on the key principles of prudent healthcare. The increase in clinical services delivered by optometrists, working together with hospital eye services, will provide NHS Wales with assurance that delivery will be equitable, consistent, and timely for all citizens across Wales. Likewise, the new clinical model will enable patients to receive timely treatment when they need it and helps to support optometry practices to sustain their future business model.
- **Prevention:** A key part of the reform includes increasing timely access to 'sight testing', holistic eye health examinations and eye health treatment and management in primary care which will lead to improved outcomes for the citizens of Wales as more eye health concerns will have been detected earlier. The focus is to improve access to eye health services in the community and in hospitals, enabling patients to access services delivered by the right professional, in the right place across the entire eye care pathway of primary care optometry and specialist hospital eye care. Prevention and well-being will be further embedded across all optometry services, facilitating improved patient outcomes and reduced demand for General Practice (GP) and specialist hospital eye care services.
- **Integration:** The proposals integrate with other policy objectives of the Welsh Government aligned to [A Healthier Wales](#) and [Programme for Government](#) commitments which relate to delivering better access to health professionals. Specifically, our Primary Care Model for Wales is about people accessing the right care, from the right professional for their specific needs, as close to home as possible. Primary care services are integrating, bringing together GPs, nurses,

pharmacists, allied health professionals, dentists, optometrists and other local services, coordinating access and effectively using everyone's expertise and time.

- **Collaboration:** In developing the detailed requirements, the Welsh Government has worked closely with stakeholders such as NHS Wales Local Health Boards, Community Health Council, NHS Shared Services Partnership, Primary Care (Optometry) leads and in doing so has helped shape the proposed reform of services.
- **Involvement:** The Welsh Government from 24 April is undertaking a consultation exercise and is actively seeking responses from sector umbrella bodies, providers, local authorities and other key stakeholders to ensure that they are involved in shaping and delivering the proposals. A summary of the responses will be published.

#### **4. How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?**

We will monitor the implementation of the new service and financial model for 12 months following the date of the regulations coming into force. This new model will be monitored against the targets that have been set within the Future Approach for Optometry Services. Annual interim reports and an official review assessing the impact of the regulations following the first five years, will be provided for publication by the Welsh Government.

Mae'r ddogfen yma hefyd ar gael yn Gymraeg. This document is also available in Welsh.

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