

**Department for Business, Energy and Industrial Strategy Consultation on
Building Our Industrial Strategy: Optical Confederation response**

The Optical Confederation represents the 13,000 optometrists, 6,000 dispensing opticians and 7,000 optical businesses in the UK who provide high quality and accessible eye care services to the whole population. The Confederation is a coalition of the five optical representative bodies: the Association of British Dispensing Opticians (ABDO); the Association of Contact Lens Manufacturers (ACLM); the Association of Optometrists (AOP); the Federation of Manufacturing Opticians (FMO) and the Federation of Opticians (FODO).

Answer to Questions 1 and 2: focus of strategy and the pillars

Yes. As well as sustaining the nation's eye health – the national eye testing service is arguably the most effective and cost-effective public health programme in the national health service and developed world, and a nationally procured service of which, as a country, we can justly be proud - we are significant contributors to health, wealth, value, tax and employment in the UK.

As a £3.2 billion services and product sector (not counting UK research) we also have more staff and premises in community locations via optical practices than most other health and retail sectors. We welcome the establishment of a clear industrial strategy for the UK, particularly relevant post-Brexit, and fully support the ten pillars set out in this Green Paper: we feel they cover the right areas. The industrial strategy needs to reflect and support our needs and we would be keen to engage closely with the Department as this is worked up.

Answer to Questions 12-14: training and skills

Training and education are key to any industrial strategy.

We fully support the government's approach to apprenticeships and look forward to playing our full role in helping to develop a more highly- skilled workforce through this means for the future.

In the meantime one area where the sector is changing and upskilling is required is the community eye health sector, where optometrists and dispensing opticians need to be supported to move up the skills ladder to meet future needs and changing health care models. The current review of education and training for these two

groups by the General Optical Council will be key to this and should not be allowed to slip. Universities and Higher Education Institutions also need to be freed up to develop new educational models to meet modern needs. As a sector we would be keen to support local partnerships to achieve these aims and to deliver training and education for optometrists, dispensing opticians, ophthalmologists and related health care professionals in new ways to meet future demand and care delivery models.

Answer to Questions 23 and 24: supporting innovation through using public procurement

The UK Optical Sector operates in a genuinely open, competitive market system where patients have wide choice, value and genuinely shape services. We are concerned therefore by recent developments in NHS England which appear to threaten to weaken commissioning, and therefore public procurement, further in this key health sector.

Reversing the 1992 health reforms, and returning to post-1948 consensus management, just to achieve the semblance of financial balance, would be a retrograde step enabling a multitude of sins and inefficiencies to be hidden away in closed systems and never challenged.

The NHS is one of our major industries and, to enable it to survive and meet the needs of a growing and ageing population, the NHS needs to move beyond the monoliths of the 20th century Hospital Plan and make a transformational shift of care to community services, historically provided most efficiently through an NHS-compliant independent sector (general medical practice, eye health, oral health, pharmacy and hearing).

In terms of health policy, therefore, we would argue for more joined-up policy across government and a move towards a far more pluralistic model of health care with the most efficient high-quality providers, close to patients, being better supported to flourish and develop services to meet growing patient need.

We would be very happy to engage with Department of Health on these issues.

Answer to Question 33: new technologies and new business models

Health research and commercialisation of health technology development are areas in which, as the Green Paper recognises, UK health care excels. However across

the EU we spend 20 times more on tobacco and alcohol than health research and within the UK only 0.7% of health research funding goes to eye health despite the ageing population and the devastating impact of sight loss on independence and well-being. Many of these are areas which could be better supported and commercialised as part of a wider industrial strategy and public good.

The companies in the UK that create and manufacture spectacle and contact lenses, implantable lenses, stylish eye wear, high-tech clinical equipment, clinical use of artificial intelligence and break through technical advances, already invest significantly in research and development in the UK. We would welcome an opportunity to meet with government officials to discuss how research, development, commercialisation and productivity in these leading sectors could be further developed as part of this industrial strategy.

Yet surprisingly in the UK, as opposed to across Europe as a whole, the proportion of investment going to health care across the UK public investment is dwarfed by investment in other areas. We would be keen to explore with the government further how research into health matters, and particularly optical and ophthalmic matters to meet the growing needs of an ageing population, could be strengthened to deliver greater value productivity and wealth within the UK outside the European Union.

We very much welcome the fact that successive governments have tried to reduce red tape and burdens on business. In the health care industries, however, progress has not been all it might be. The NHS in particular is a bureaucratic organisation that prefers process over outcomes despite its professed aims. We would be keen to support further initiatives to reduce unnecessary bureaucracy and waste in these areas.