



## **OPTOMETRY WALES ADVICE NOTE COMMUNITY PROVISION OF SERVICES AND THE WELSH LANGUAGE**

Optometry Wales is the professional, umbrella organisation for all optometrists, dispensing opticians and optometric practices across Wales. We welcome the opportunity to provide written evidence to the National Assembly for Wales' Culture, Welsh Language and Communications Committee - National Health Service Regulations 2019

### **Background**

Optometrists in Wales currently work to the 1948 General Ophthalmic Services (GOS) Terms of Service. Eye Health Examination Wales (EHEW) Accredited Optometrists also help deliver a national suite of services under the auspices of the Wales Eye Care Service. This includes community based delivery of national Low Vision Services, Acute and Extended Eye Health Examinations, Post Cataract and Monitoring of Suspect Glaucoma and Ocular Hypertensive (OHT) Patients. Each of the 7 health boards across Wales also have locally commissioned enhanced services.

As contractors to the health board, practices are expected to comply with the Primary Care Services and Counter Fraud Post Payment Verification (PPV) visits conducted at various intervals with the aim of enabling the NHS in Wales to ensure that prescriptions and ocular aids prescribed were legitimately provided and appropriately recorded. Contractors wishing to provide GOS services must be listed on the Ophthalmic and Supplementary Lists, kept and maintained by individual Health Boards.

There is no requirement for practices to list when they are open, what languages are offered although there is no legislation in place that prohibits a practice from advertising their services in terms of what they offer in a community setting. Currently the GOC do not list if a practitioner is EHEW or LVSW accredited or what language they speak.

Health Boards do list the name and location of practices and the Companies Act governs the practice within individual companies and the NHS Wales Choose Well app and the [www.eyecarewales.nhs.uk](http://www.eyecarewales.nhs.uk) website does list EHEW accredited practices.

As all optometric practices are governed by the Companies Act they can advertise via their own websites/yellow pages etc. when they are open and what services they provide.

### **LANGUAGE PROVISION**

At present and following the recommendations as set out in the Welsh Language Act we would advise practitioners not to conduct sight tests or clinical examinations in any other language other than the language in which

they studied. We have concerns about the medico-legal implications of delivering clinical examinations and advice in any language other than English. Optometry Wales also acknowledge that the sector is highly competitive and language services are another area where this competition will undoubtedly stimulate change.

It is our view that a Clinician must adhere to GOC standards of practice (<https://www.optical.org/en/Standards/index.cfm>) where it states that they must:

- give patients information in a way that they can understand. Use personal judgement to adapt your language and communication approach as appropriate (2.1.1)

but also:

- recognise, and work within their limits of competence (6)

The key thing is that the clinician is allowed to use their personal judgement. If they feel uncomfortable conducting an Eye Examination through the medium of Welsh they shouldn't be 'forced' to.

What restricts fluent Welsh Speaking Clinicians from conducting eye examinations in Welsh is:

- they may feel uneasy to discuss clinical findings in Welsh as they have not been taught through the medium of Welsh.
- Clinical words in Welsh are not 'every day' language and as a result, patients/clinicians even though their first language may be Welsh, do not always 'know' these words. Using unfamiliar terminology poses a risk to both patient and clinician and increases the chance of key messages being miss-interpreted

We're aware that many customer concerns and fitness to practice cases stem from poor communication. So as a clinician, prior to conducting an examination through the medium of Welsh, the clinician must assess whether doing so poses any risk to patient safety or their own professional registration

With regards to referrals and other collaborative work, the clinician must ensure that their communication is clear and effective (10.1.1). Records must be 'clear' and 'accessible for all those involved in the patient's care' (8.1). Therefore, the language used in referrals and records can only be English.

We note that Health Boards have a responsibility to provide translation services for patients who require their eyecare through the medium of another language (other than English) but we know that these services can often be difficult to access especially when dealing with a patient who presents with an acute eye condition that might require urgent attention.

We continue to debate this matter with Welsh Government via the EHEW Advisory Group and during separate negotiation with Welsh Government.

We would draw practitioner's attention to the recently published Accessible Information Standards from the Optical Confederation and note that these

standards only apply to England at present but this standard does reflect the position in Wales at present.

<http://www.opticalconfederation.org.uk/downloads/accessibleinfoguidanceopticalconfedjuly16.pdf>

However, we would urge practitioners to contact their local ROC or Health Board and find out if there are voluntary organisations that can help provide these services such as the WEDS service – information available via your local health board. Optometry Wales will continue to liaise with Welsh Government and the EHEW and LVSU Committee's to ensure that practices are both able to support accessible standards for their patients in Wales and to be supported themselves in implementation.