

Should the proposed measure be adopted and enforced to include primary health care contractors, it would potentially undermine the current provision of professional indemnity insurance. Optometry Wales has been advised by the profession's insurers that they would have to reconsider providing appropriate cover. Since the existing insurance policies for practising members of the optometric profession cover both private and NHS practice, there is a danger that any transfer of liability to the NHS by means of the proposed redress measure could negate the insurance cover of private practice. It is unlikely that NHS Wales would wish to shoulder such an additional responsibility.

It is not clear from the proposed measure how the matter of fitness to practice within the current regime of regulation of the profession would continue to function, if the proposed measure were adopted and the principle of no-fault introduced. Optometry Wales wonders if the Welsh Assembly Government has consulted the regulatory bodies on this important matter.

Yours sincerely,



Helen Tilley
Chairman
Optometry Wales

Dictated by Ms Tilley and signed in her absence