

12 June 2026

OFNC submission – Health Bill 2026 Public Bill Committee call for evidence

Primary Eye Care

1. Introduction

This submission to the Committee’s call for evidence focuses on powers in the Health Bill with a view to protecting of the highly valued national sight testing service as well as delivering the Government’s stated aim of shifting care from hospitals into the community (‘left shifts’).

2. About OFNC

The Optometric Fees Negotiating Committee (OFNC) – the body recognised by DHSC as the representative voice of all primary eye care contractors in England.

The OFNC is made up of the Association of British Dispensing Opticians, the Association of Optometrists, the British Medical Association and FODO – The Association for Eye Care Providers.

3. National sight testing service

The national sight testing service has been one of the major successes of the NHS. It is universally available - on a means-tested and risk-based basis - to ensure no-one has to go without eye care and vision correction in their daily lives, and remains one of its most clinically effective and preventative services the NHS provides to the whole population. Although severely underfunded, it has nevertheless managed to deliver high-quality eye care close to home, with more than 13 million NHS sight tests provided in England each year, achieving high levels of patient satisfaction while supporting early intervention and prevention.

Schedule 1, section 28 of the Bill amends the NHS Act 2006 to include duties for Integrated Care Boards (ICBs) to arrange primary ophthalmic services including securing provision of the national sight-testing service.

We have had written reassurances from the Department of Health and the Minister of State for Care in Parliament that, although responsibility will formally rest with ICBs as a result of the abolition of NHS England, NHS sight testing services will continue to operate within a national regulatory and contractual framework, with contract terms

set in regulations and fees set nationally through Directions and that the bill will not affect patient eligibility for NHS sight tests. This should provide great reassurance to the public.

Delivering the ‘Left Shifts’

The government’s 10 Year NHS Health Planⁱ sets out three big shifts the government wants to achieve: to improve care from hospital to community, analogue to digital and sickness to prevention.

Sickness to Prevention

The national sight testing service already delivers highly on the ‘prevention shift’ by ensuring access to effective vision correction for all ages and checking the eye (internally, externally and around the eye) for any early signs of disease. Eye diseases are insidious, and without sight testing, patients can be unaware they have them until they start to lose sight. The sight test ensures these conditions (and many others such as diabetes, high blood pressure, brain tumours) are picked up early and can be treated in time.

Hospital to Community

Optometrists and dispensing opticians are highly trained and regulated community clinicians and, as far as the left shift from hospital to community is concerned, can deliver a high level of eye care beyond sight testing. Providers have also invested heavily in modern facilities and digital equipment to improve care. They could therefore deliver significantly more eye care outside hospitals in line with the hospital to community ‘left shift’ to take pressure off over-stretched hospitals and waiting lists by ensuring that patients are seen and treated by the right clinician at the right time closer to home. The key to success here is for services to be properly planned, commissioned and resourced at local level. At present there is a lack of national leadership in the NHS to make this ‘shift’ happen.

Analogue to Digital

Eye care providers have always readily embraced innovation, technology and digitisation especially in care delivery, for example, in digital retinal screening and the introduction of optical coherence tomography (OCT) retinal scanning, and have been leaders in the development of DICOM standards. The sector would also welcome the introduction of the electronic referral system (ERS) provided it has the funding required to deliver a viable solution that is properly planned and funded, including additional work that practices will be required to take as a result.

The simple truth is that the NHS sight test, historically underfunded in England at £24.13 per patientⁱⁱ, has depended for far too long on the goodwill that providers have given to support their patients and the NHS. With significant funding gaps already

causing challenges in NHS primary eye care, providers are unable to bear any additional unfunded burdens associated with ERS. Recent Department of Health and Social Care announcements of some initial funding over 4 yearsⁱⁱⁱ will not deliver the government's ambitions for the 'left shift' in eye care for a country the size of England. Without properly costed and funded plans, all these ambitious aims for patients, which the primary eye care sector shares, will fail as so many NHS IT plans have in the past.

We hope the Bill Committee will press the government on these issues, especially the funding issues, so that the benefits of the bill can be delivered, rather than simply another ambition.

Endnotes

ⁱ Department of Health and Social Care (2025) *Fit for the future: 10 year health plan for England*. Available at: <https://assets.publishing.service.gov.uk/media/6888a0b1a11f859994409147/fit-for-the-future-10-year-health-plan-for-england.pdf>

ⁱⁱ Welsh Government (2025), *Letter NHS Associated Fees*. Available at: [https://www.optometrywales.org.uk/wp-content/uploads/2025/11/Letter NHS Associated Fees-en.pdf](https://www.optometrywales.org.uk/wp-content/uploads/2025/11/Letter_NHS_Associated_Fees-en.pdf)

Scottish Government (2025), *Primary Care Optometry: General Ophthalmic Services (GOS) remuneration increases*, PCA(0)2025(05). Available at: <https://www.publications.scot.nhs.uk/files/pca2025-o-05.pdf>

ⁱⁱⁱ Department of Health and Social Care (2026) *Millions to get faster eye care on the high street*. Available at: <https://www.gov.uk/government/news/millions-to-get-faster-eye-care-on-the-high-street>