

Cllr J Hanna OBE

Chair, Oxfordshire Health
Overview and Scrutiny
Committee

11 November 2025

Dear Secretary of State for Health & Social Care,

Subject: Request for a National Review of Independent Service Providers in NHS Ophthalmology

I am writing to you on behalf of the Oxfordshire Joint Health Overview Scrutiny Committee (JHOSC), in support of the Royal College of Ophthalmologists' recent response to the NHS Payment Scheme consultation for 2025/26. Their submission raises significant concerns regarding the impact of current and proposed payment structures on the sustainability and quality of NHS ophthalmology services.

The College's response highlights the unintended consequences of profit-driven care, particularly the risk of Independent Service Providers (ISPs) prioritising profitable procedures such as cataract surgery, retinal injections, and low-risk glaucoma, at the expense of comprehensive care for complex and sight-threatening conditions. This shift threatens the ability of NHS Trusts to deliver equitable and high-quality ophthalmic care, and may exacerbate inequalities in patient access and outcomes.

In light of these concerns, the JHOSC supports the Royal College of Ophthalmologists' call for a national review into the use and oversight of ISPs in NHS-funded cataract surgery and related services. Specifically, we recommend scrutiny of non-contracted activity, coding practices, and referral pathway payments, to ensure patient safety and system integrity.

We strongly support this request and urge the Department of Health & Social Care to commission a formal, independent review of ISPs within NHS ophthalmology. Such a review should assess the impact of ISPs on service delivery, workforce stability, financial sustainability, and patient outcomes, and make recommendations for future policy and oversight.

We also endorse the College's proposal for a six-month formal review following any implementation of new payment schemes, to ensure that intended outcomes are achieved and corrective action can be taken if necessary.

The Committee was concerned during local scrutiny of Ophthalmology services to learn about the negative local impacts of ISPs and that the plans are to accelerate this programme. Whilst the national Choice framework enables existing providers to extend their offer and for new providers to enter the market if they meet specific criteria to deliver Consultant led services, there is no cap to this activity and spend. Whilst this gives patients of non-complex procedures greater choice and shorter waiting times, this is

having a destabilising impact on wider NHS Trust Ophthalmology services and was distorting clinical priorities.

Whilst simpler high volume cataract procedures can be subject to a longer wait without impacting clinical outcome, this is not the same for more complex patients who are at significant exposure to harm and then to needing other NHS services such as emergency care. There were other concerns about the ability of the local NHS to monitor the quality and safety of the standard contracts of the ISPs and that without direct contracts local oversight was inherently more limited.

Thank you for considering this request. We would welcome the opportunity to contribute further to this important discussion and to support efforts to safeguard the future of NHS ophthalmology services.

Yours sincerely,

A handwritten signature in black ink, reading 'Jane Hanna'. The signature is written in a cursive style with a large, looped 'J' and a trailing flourish.

Cllr Jane Hanna OBE

Chair, Oxfordshire Joint Health Overview Scrutiny Committee