

**GOC response to our consultation on
managing applications for GOC registration
from optical professionals who have qualified
outside the UK**

May 2024

Contents

Executive summary	3
Findings	4
Conclusions	5
Introduction	7
Background to policy	7
Consultation process	8
Approach to producing this response.....	8
Findings.....	9
Proposals 1 and 2.....	9
Proposal 3.....	11
Feedback: Equality Act 2010.....	14
Feedback: implementation date	16
Feedback: alternative proposals.....	17
Feedback: overseas qualifications	19
Conclusions.....	21
General comments.....	21
Next steps: future management of applications	21
Risk/Benefit analysis	23

Executive summary

Introduction

1. One of the GOC's main functions is to approve qualifications in optometry and dispensing optics leading to entry to the register. We also ensure that optical professionals who have qualified outside the UK who wish to join the GOC's register meet the same standards as optical professionals who have qualified in the UK.
2. The process for managing applications for GOC registration from optical professionals who have qualified outside the UK needs to be updated following the approval in February 2021 of new education and training requirements (ETR) for GOC approved qualifications leading to registration as an optometrist or a dispensing optician.
3. At present, optical professionals who have qualified outside the UK applying to join the GOC register are assessed by us against our handbook requirements (Quality Assurance Handbooks for optometry (2015) and ophthalmic dispensing (2011)). If that assessment is successful, applicants then go on to undertake either The College of Optometrists' Scheme for Registration (for optometrists) or the Association of British Dispensing Opticians' (ABDO) examinations (for dispensing opticians). However, implementation of the ETR means that the College's scheme will cease to operate and so our current processes for internationally qualified registrants need to be replaced.
4. Therefore, in July 2023 we launched a consultation on how we might manage future applications to the GOC register for optical professionals who have qualified outside the UK, and how we might assess whether they meet our updated '[outcomes for registration](#)' for optometry and dispensing optics. You can read the [consultation document](#) which explained our proposals.
5. Briefly, we consulted on the following revised approach to managing applications for GOC registration from optical professionals who have qualified outside the UK, as follows:
 - a. Proposal 1: The applicant successfully completes and is awarded a GOC approved qualification in either dispensing optics or optometry. The provider of the approved qualification will be responsible for the decision to admit an applicant or not, including any assessment of prior learning and experience (advance standing) with reference to publicly accessible guidance, such as guidance produced by the optical sector on geographic equivalence;

- b. Proposal 2: The GOC will no longer undertake individual registration assessments prior to an applicant applying to be admitted to a GOC approved qualification; and
 - c. Proposal 3: The GOC may continue to assess applications for registration from optical professionals who have qualified outside the UK who meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration'). We said in the consultation that we expected such applications to be rare (less than ten a year) and that we will continue to charge a fee for this assessment.
6. We undertook a full public consultation for 12 weeks from 12 July 2022 to 4 October 2023. We received 36 written consultation responses from a range of stakeholders including our registrants, members of the public, the education sector, and optical representative organisations.

Findings

7. Key findings from the consultation were:
- 47% of respondents reported that proposals 1 and 2 will have a positive impact;
 - 41% of respondents reported that proposals 1 and 2 will have a negative impact;
 - 11% of respondents reported that proposals 1 and 2 will have a neutral impact;
 - 64% of respondents reported that proposal 3 would have a positive impact;
 - 11% of respondents reported that proposal 3 would have a negative impact;
 - 25% of respondents reported that proposal 3 would have a neutral impact; and
 - 56% of respondents support direct application to the GOC for optical professionals who have qualified outside the UK who meet or exceed the requirements for GOC registration (including the relevant ['outcomes for registration'](#)).
8. There was a noticeable difference between respondent type; 60% of responses from organisations reported that proposals 1 and 2 would have a negative impact, whereas only 35% of individual responses reported that proposals 1 and 2 would have a negative impact. 80% of responses from

organisations reported that proposal 3 would have a positive impact, whereas 58% of individual responses reported that proposal 3 would have a positive impact.

9. Although more people felt that the revised approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010, than have a positive impact, the percentage of respondents who said “don’t know” or “none of the above” was significantly larger than any protected characteristic identified as potentially discriminated against or unintentionally disadvantaged.
10. The feedback we received on implementing the proposals varied from implementing the change earlier than September 2026, to waiting until a complete cycle of four-year UK ETR qualifications had been completed (i.e. after the first ETR cohort graduates) in 2028.
11. A large amount of feedback was received on comparable non-UK qualifications for optometry with countries cited as comparable to UK optometry including Ireland, USA, Canada, Australia, New Zealand, and South Africa. The European Diploma in Optometry (EDO) was highlighted by some for its comparability with UK optometry education.
12. We also received feedback about alternative ways of managing applications for GOC registration from optical professionals who have qualified outside of the UK that were not included within the consultation proposals.

Conclusions

13. Whilst the feedback to this consultation suggests there is support for an education provider-led solution (proposals 1 and 2) it was evident that there is also support for a GOC managed direct assessment of the outcomes for registration.
14. We therefore intend to develop two alternative routes to registration for applicants who have qualified outside the UK:
 - a. successfully completing a GOC approved qualification which meets the ETR (either in the UK or overseas) with admissions handled directly between provider and applicant and no GOC involvement in assessing applications (see paragraph 54); or
 - b. successfully completing a GOC managed direct assessment of the outcomes for registration, leading either to direct entry to the register or access to a GOC approved qualification which meets the ETR (see paragraphs 51 to 53).

15. To support both routes to registration, we will commission an analysis that maps potential equivalent qualifications in certain overseas countries against the ETR. This will aim to identify qualifications and/or qualification systems that potentially might match or exceed the ETR, and where subject to the necessary approvals, recognition of that qualification and/or qualification system could potentially offer direct entry to the GOC register¹.
16. Where this analysis demonstrates a shortfall in expectations between the ETR and overseas qualifications and/or qualification systems, this gap analysis will assist providers of GOC approved qualifications in their decisions whether or not to admit an overseas qualified professional to a GOC approved qualification leading to entry to the register, and in their design of such qualifications.
17. While there will be an implementation period as we develop our processes, please note there is no regulatory barrier other than our quality assurance and enhancement method (QAEM) processes to prevent education providers from running qualifications that would support non-UK professionals gain entry to the GOC register now. Similarly, there are no regulatory restrictions to prevent non-UK optical professionals from pursuing UK optical qualifications now.

¹ On condition of a period of supervised practice once registered with the GOC.

Introduction

18. The GOC is one of 13 organisations in the UK known as health and social care regulators. These organisations oversee the health and social care professions by regulating individual professionals. We are the regulator for the optical professions in the UK. We currently register around 33,000 optometrists, dispensing opticians, student opticians and optical businesses.
19. We have four primary functions:
 - setting standards for optical education and training, performance and conduct;
 - approving qualifications leading to registration;
 - maintaining a register of individuals who are fit to practise or train as optometrists or dispensing opticians, and bodies corporate who are fit to carry on business as optometrists or dispensing opticians; and
 - investigating and acting where registrants' fitness to practise, train or carry on business may be impaired.

Background to policy

20. At present, optical professionals who have qualified outside the UK applying to join the GOC register are assessed by us against our handbook requirements (Quality Assurance Handbooks for optometry (2015) and ophthalmic dispensing (2011)). If that assessment is successful, applicants then go on to undertake either The College of Optometrists' Scheme for Registration (for optometrists) or ABDO's examinations (for dispensing opticians).
21. Now that our two quality assurance handbooks have been replaced by our new ETR, we needed to consult on how we might manage applications to the GOC register for optical professionals who have qualified outside the UK, and how we might assess whether they meet our updated 'outcomes for registration' for optometry and dispensing optics.
22. This is particularly important for optometrists who have qualified outside the UK. At present most optometrists who have qualified outside the UK, following an assessment by us, undertake The College of Optometrists' Scheme for Registration. In future, once GOC approved qualifications in the UK have adapted to meet the updated ETR and students studying on existing GOC approved qualifications have joined the GOC register, The College of Optometrists' Scheme for Registration will cease, and will not be available for international applicants to utilise.

Consultation process

23. We undertook a full public consultation on our revised approach, which was open for 12 weeks from 12 July 2022 to 4 October 2023.
24. We sought stakeholders' views on our revised approach ahead of replacing the current process in September 2026.
25. We received 36 written consultation responses (including one late response) from a range of stakeholders. These were made up of:
 - one dispensing optician;
 - 21 optometrists;
 - one therapeutic prescribing optometrist;
 - one member of the public;
 - six professional bodies;
 - four education and training providers; and
 - two employers.
26. The organisations who were willing to be named were:
 - Aston University;
 - Association of British Dispensing Opticians (ABDO);
 - European Council of Optometry and Optics (ECOO);
 - The College of Optometrists;
 - FODO – the Association for Eye Care Providers; and
 - Association of Optometrists (AOP).
27. We are grateful for all the feedback we received and have taken this into account in deciding how to amend the revised approach.

Approach to producing this response

28. Respondents were encouraged to provide explanations with their responses to our multiple-choice questions. As a result, the consultation provided a mix of quantitative and qualitative data which included feedback about alternative ways of managing applications for GOC registration from optical professionals who have qualified outside of the UK that were not included within the consultation proposals. We reviewed every comment received. We are unable to include individual responses to all the comments within this report.

Findings

Proposals 1 and 2

29. We asked respondents to consider proposals 1 and 2 and whether these will have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who qualified outside of the UK. Although more respondents thought proposals 1 and 2 will have a positive impact (47%), most respondents expressed an alternative view including those who thought proposals 1 and 2 will have a negative impact (41%) and those who thought they would have a neutral impact (11%).

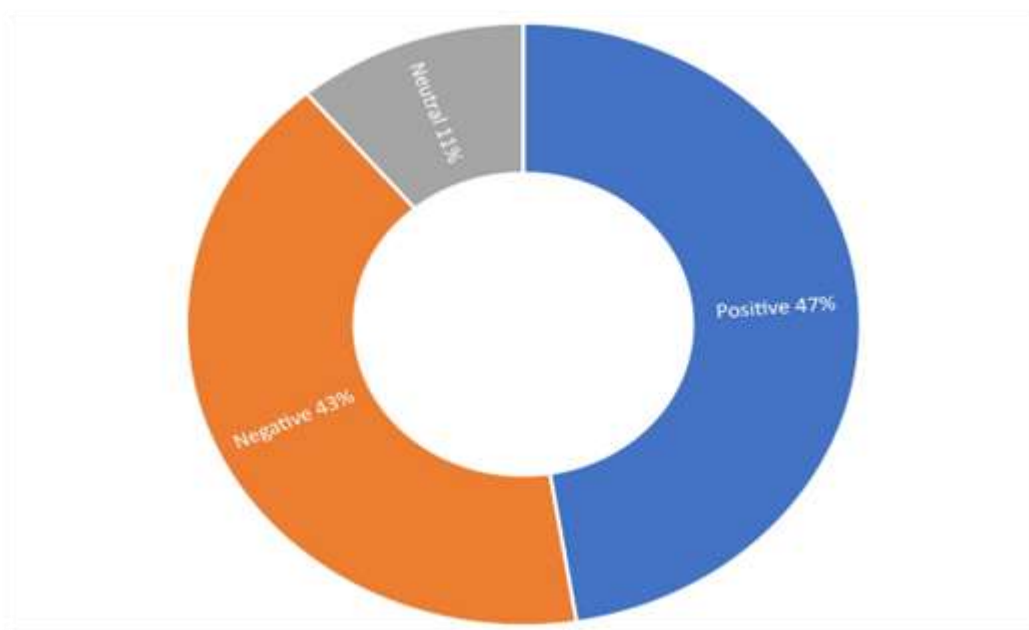


Figure 1: Please consider proposals one and two. Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

30. A range of positive and negative feedback was received from respondents about proposals 1 and 2.
31. The positive feedback included:
- The proposal will allow optometrists with a suitable level of qualification from overseas to rapidly register in the UK;
 - Providers of an approved qualification for optical professionals who qualified outside of the UK may benefit through an additional income stream (charging international fees);

- This will enhance the UK's ability to attract talent and make the optometry career path more attractive to potential students;
- The GOC can monitor the process through normal accreditation activities with qualification providers;
- Long delays currently experienced by candidates applying through the current system can be reduced if a standardised approach using "publicly accessible guidance" is developed and utilised; and
- The impact could be positive because graduates from outside the UK who hold qualifications that do not meet the GOC ETR will take a GOC approved qualification.

32. The negative feedback included:

- Some applicants only really need to complete small elements on the UK syllabi to be deemed an equivalent standard in their training and experience, so expecting them to complete a 'standard' course to enter the register could be far more onerous than it needs to be;
- Potential applicants may see this as taking longer or an overly burdensome way of entering the register and putting off applications, limiting the diversity of skills and experiences in the optical sector;
- The extent to which a bespoke approved course for an individual applicant can be offered is likely to be extremely limited;
- It is not clear how providers will be able to design a top-up course for such a diverse range of prospective entrants. The course that is designed is likely therefore to be a rather blunt instrument, requiring graduates from outside the UK with very different levels of training to undertake a broadly (or very) similar top-up course;
- The additional cost to providers of developing and maintaining the qualifications, and in assessing applications for advanced standing, will be passed on to those individuals and therefore the costs associated with the route to GOC registration will likely be increased;
- The administration required from providers to run such qualifications may discourage providers from entering the market and force those already involved to exit, which questions the viability of the proposals;
- A likely scenario is that applicants would apply to a number of universities with the same information, each of which would spend time assessing their evidence, representing a decrease in efficiency from the current process;

- There may be considerable variation in initial verification checks undertaken for each applicant, some providers will be more rigorous than others; and
 - There may be variation in the level of recognition of prior learning (RPL) that one provider may apply to another.
33. A sample of the comments we received in response to this question are in the box below.

“It has taken many years for the mappings undertaken in dispensing applications to align, with opinions on the level of evidence required, initially being quite different. I have great concern that if the responsibility lies with the providers there will be considerable variation.” (ABDO)

“This new, somewhat less-welcoming approach from the GOC to overseas qualified individuals might act as a discouragement to otherwise enthusiastic applicants at the very time as they are most needed.” (AOP)

“Ultimately the impact could be positive because graduates from outside the UK/Switzerland who hold qualifications that do not meet the GOC-ETR will take a GOC-approved qualification so as to make good the perceived deficiency in their training relative to ETR.” (European Council of Optometry and Optics (ECOO))

“There would need to be a rapid GOC process, with pre-mapping of these overseas course outcomes in place to improve efficiency.” (Aston University)

“Proposal 1 suggests that an overseas qualified optometrist will have to complete the full UK qualification, which for many international applicants is excessive. It would be more appropriate for international applicants to complete part of the full UK qualification, but that would require individual registration assessment to identify the areas in which an applicant is lacking.” (Optometrist)

Proposal 3

34. We asked respondents to consider proposal three and whether this will have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK. A clear majority of respondents thought proposal 3 would have a positive impact (64%) whilst a minority of respondents thought the proposal would have a negative impact (11%).

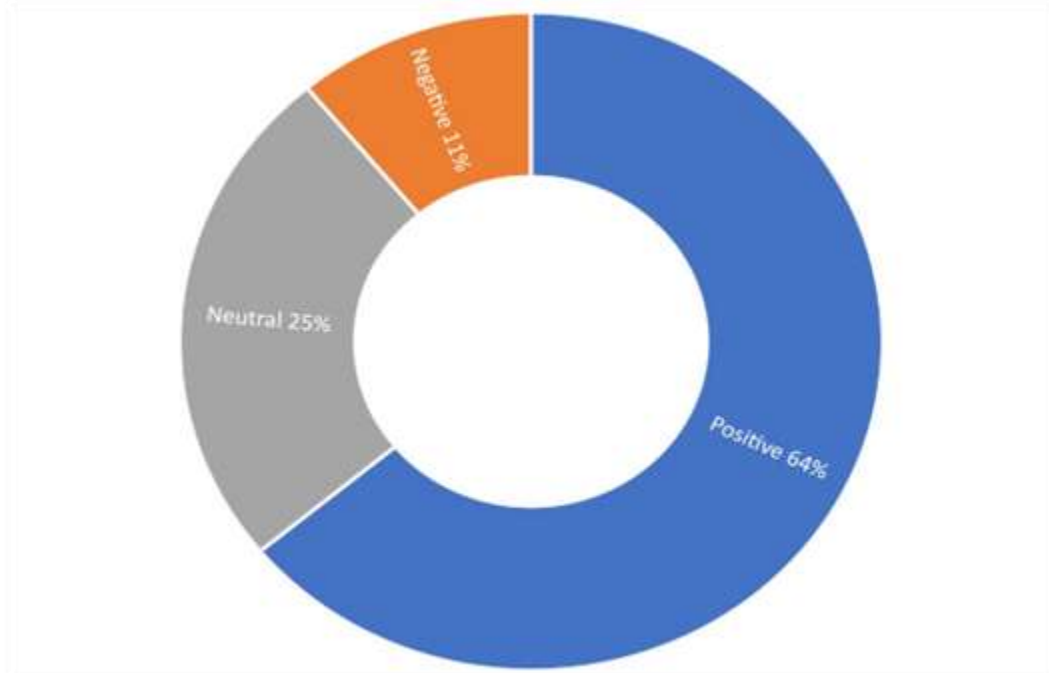


Figure 2: Please consider proposal three. Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

35. A range of positive and negative feedback was received from respondents about proposal 3.
36. The positive feedback included:
- It will benefit those who have graduated from courses that meet or exceed the ETR to register more quickly;
 - It would represent a cheaper and more efficient route to UK registration;
 - The process would safeguard the public ensuring the application process was rigorous, consistent and fair; and
 - If qualifications from certain countries/nations/regions/institutions are deemed to meet or exceed requirements, then it is obvious optometrists with a current qualification from these countries/institutions should be permitted to register without the need to gain an additional UK qualification.
37. The negative feedback included:
- It is not clear how such applicants would be supported to navigate UK and local health and commissioning requirements and legal frameworks, which by their nature, are country specific.

38. A sample of the comments we received in response to this question are in the box below.

"It is likely that some applicants will not need to undertake additional activity to qualify to practise in the UK, and this would represent a cheaper and more efficient route to UK registration. However, it is not clear how such applicants would be supported to navigate UK and local health and commissioning requirements and legal frameworks, which by their nature, are country specific. Example outcomes/indicators that must be evidenced as met include:

1.8 Refers and signposts as necessary to sight loss and other relevant health services.

3.5a(iv)... Appraises the need for and urgency of making a patient referral, using relevant local protocols and national professional guidance, and acts accordingly

3.5a(v) ...Adheres to legal requirements for the use and supply of common ophthalmic drugs.

4.3 Understands and implements relevant safeguarding procedures, local and national guidance in relation to children, persons with disabilities, and other vulnerable people.

"It is also not clear how candidates will be consistently and correctly signposted to the correct application route without incurring unnecessary fees or delays. (Direct to GOC or to qualification provider)." (The College of Optometrists)

"Assuming that meeting the ETR requirements is the only criteria for overseas qualified individuals, then the College/ABDO examinations would be removed – this removes a cost for the applicant (or their employer) as well as a further step in the process to registration.

"We assume the fee for this assessment will be less than currently due to the reduced processing. Therefore, this will be positive for the individual applying.

"Again, there should be very clear, comprehensive GOC guidance which allows an appropriate self-assessment and to understand if there are gaps, including advice around what evidence will be required for this route." (FODO)

"Our understanding is that the GOC currently asks recent graduates from programmes in the USA to conduct the SfR [Scheme for Registration]. However, this seems inappropriate as such individuals may well meet (and probably exceed) the GOC-ETR without the need for any additional training. It is appropriate for some graduates from outside UK and Switzerland to be allowed to join the registers directly and it is a positive development that the GOC is proposing this." (European Council of Optometry and Optics (ECOO))

"A standardised exam should replace the interview. That will eliminate human bias." (Optometrist)

“It seems right that these applicants should not have to undertake undergraduate training again, if there is evidence from the qualification/register abroad about the standard to overseas qualification.” (Anonymous response)

Feedback received on whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 (including positive identified impacts)

39. More people felt that the revised approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 than have a positive impact. However, the percentage of respondents who said “don’t know” or “none of the above” was significantly larger than any protected characteristic seen as potentially discriminated against or unintentionally disadvantaged. Of these, race, age and disability had the largest percentage responses.

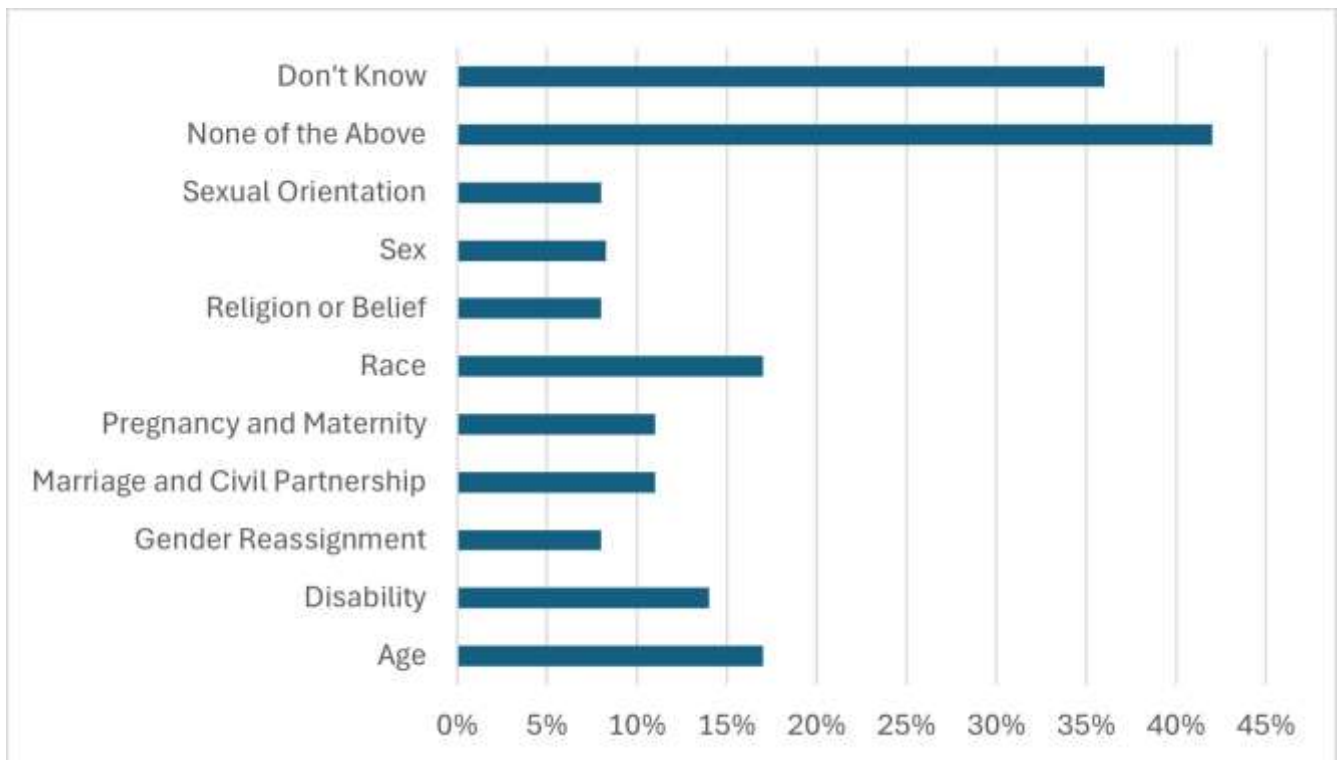


Figure 3: We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below?

40. A sample of the comments we received about the impact on individuals or groups sharing any of the protected characteristics in the Equality Act 2010 are in the box below.

“It is possible that migrants and refugees may be impacted unfairly if support to navigate the new approach lacks clarity, involves long delays, or attracts increased costs.” (The College of Optometrists)

“No obvious impact (+ve or -ve) any group.” (European Council of Optometry and Optics (ECOO))

“Positive impacts:

Age - Younger professionals who are more adaptable to newer technologies and educational formats might find it easier to navigate the requirements for registration, potentially benefiting them.

Disability - If the GOC incorporates digital assessment and learning tools that adhere to best practices for accessibility, individuals with disabilities might find it easier to complete their qualifications.

Race - A standardised and transparent process for international qualifications could benefit racial and ethnic minorities by reducing the scope for unconscious bias in the registration process.

Religion or belief - Providing flexibility in exam schedules to accommodate religious observances would positively impact individuals of specific faiths.

Sex and gender reassignment - Including mandatory training on inclusivity for evaluators would positively impact women and those who have undergone gender reassignment by fostering a more equitable assessment environment.

Sexual orientation - Inclusion training could also benefit LGBTQ+ individuals by ensuring that assessors and other professionals involved in the registration process are sensitive to issues related to sexual orientation.

Negative impacts:

Age - Older professionals might find adapting to new educational and qualification requirements more challenging, mainly if they have been practising for a long time in a different jurisdiction.

Disability - Accessibility can be a concern, particularly in practical examinations or clinical training settings. Reasonable accommodations must be in place for disabled applicants.

Race - The relevance of considering how systems of qualification in the home countries of racially diverse applicants are valued and assessed by

the GOC and educational providers. There may be unintentional biases in the evaluation of qualifications from specific regions.

Religion or belief - Training and examination schedules could conflict with religious observances, disadvantaging specific individuals.

Pregnancy and maternity - The length of programs and timing of examinations could have implications for those who are pregnant or have maternity needs, potentially disadvantaging them in the registration process.

Sex and gender reassignment - Some healthcare settings can be discriminatory or not fully inclusive, affecting people who have undergone gender reassignment or may face gender discrimination.

Sexual orientation - While not directly related to qualifications, a hostile or discriminatory educational or clinical training environment could disadvantage LGBTQ+ individuals.

Marriage and civil partnership - There could be issues of spousal sponsorship for visas or the availability of visas for partners, which might affect these individuals differently.” (Optometrist)

Feedback received about whether a proposed implementation date of September 2026 is realistic

41. The feedback we received on this varied from implementing this process change earlier than September 2026, to waiting until a complete cycle of four-year UK ETR qualifications had been completed (i.e. after the first ETR cohort graduates) in 2028. A selection of comments is featured in the box below.

“September 2026 is likely to be the start of the first year that any education provider is able to deliver the final year of the new ETR programme, and the first year of the new placement (for the majority of programmes) for employers/placement providers. Implementing this process change for overseas qualified individuals from that year is not advisable as the underpinning education programmes will still be in development/implementation.

“We are not sure that education providers in the UK will be able to develop a separate/complementary programme for overseas qualified individuals within this timeframe, or indeed a process for recognition of prior learning when they have not completed the implementation of their new ETR programmes.

“We suggest it would be better to wait until a complete cycle of the core UK programmes have been completed by all providers that are planning to provide a programme/route for overseas graduates. Therefore, we

recommend the implementation of this new process should commence from September 2027 at the earliest.” (FODO)

“This should happen even earlier if possible to reduce the application backlog.” (Aston University)

“Providers are very busy at present dealing with the new ETR landscape and it is difficult to see how they will have time to design and seek approval from GOC for a new course aimed at graduates from outside UK/Switzerland.

“A lead in time period (e.g. 1 year) could be very useful here where each application is assessed under the old and the (proposed) new system. This might help to identify potential early pitfalls with the new system before it becomes operational.” (European Council of Optometry and Optics (ECOO))

Feedback received relating to alternative ways of managing applications for GOC registration from optical professionals who have qualified outside of the UK that were not included within the consultation proposals

42. We received feedback about alternative ways of managing applications for non-UK optical professionals. In summary, this feedback included support for:

- A single (and centralised) pre-assessment process that ensures consistency of decisions made for all non-UK optical professionals;
- Such a pre-assessment process could evaluate the qualifications and experience of non-UK optical professionals, which may determine which candidates may require additional education and training; and
- A standardised examination or assessment to demonstrate competence in a uniform way.

43. The broad range of comments about alternative proposals from those who provided a negative response to proposals 1 and 2 are in the box below.

“The GOC should incorporate assessment of “equivalent” non-UK qualifications into a process for direct application for registration. This would need to include clarity on which qualifications from which countries are accepted, and requirements for currency and CPD that are judged to be equivalent to those in use in the UK. All who do not meet the stated requirements should be directed to approved qualification provider(s).” (The College of Optometrists)

“The existing GOC process maps the applicants’ previous studies to the core competencies, the new outcomes for registration (OfR) are higher level and would not be a good indicator of the depth of knowledge. There is no reason

the syllabus the applicant provides cannot be mapped to a selection of UK courses/syllabi as a more accurate indicator of the level to which an applicant has studied.” (ABDO)

(The current GOC pre-assessment) “provides a single uniform process, that ensures consistency of decisions made – to remove this and place the onus on individuals and HEI [higher education institution] providers will erode this consistency” (FODO)

“For consistency of approach all applications from all overseas qualified practitioners, assessment should ideally be done centrally.” (Anonymous response)

“If courses in optometry/dispensing were encouraged to benchmark themselves against a common standard then it would be simpler for providers to establish where deficiencies lie relative to ETR, and therefore to design a course to meet these deficiencies. Such a standard already exists, the EDO [European Diploma] for Optometry and the EQO [European Qualification in Optics] for dispensing.” (European Council of Optometry and Optics (ECOO))

“A central assessment such as that currently in place offers more consistency and efficiency than the proposals being considered.” (Anonymous response)

“Appoint independent experienced qualified registrant assessors with educational knowledge (maybe 2 per applicant) who can assess evidence, course transcripts and practical experience and determine suitability for: rejection, acceptance or review. Plus an appeals process.” (Optometrist)

“The GOC could consider a pre-assessment phase that evaluates applicants’ foreign qualifications and experiences. This would serve as a filter to determine which candidates may proceed directly to registration and which would need additional training or qualifications.” (Optometrist)

“Create short, specialised “bridging programs” that allow foreign-trained professionals to fill in any gaps in their education or training rather than requiring them to complete an entire GOC-approved qualification” (Optometrist)

“Instead of doing away with individual assessments, consider implementing a standardised exam to assess the equivalency of overseas qualifications to GOC standards. This would allow professionals with differing educational backgrounds to demonstrate their competence uniformly.” (Optometrist)

Feedback received on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR

44. A large amount of feedback was received on comparable non-UK qualifications. These mostly related to optometry although a couple of responses referred to a lack of comparability of non-UK dispensing optics qualifications with further training and assessments required before non-UK dispensing opticians can join the GOC register. Countries cited as comparable to UK optometry included Ireland, USA, Canada, Australia, New Zealand and South Africa. The European Diploma in Optometry (EDO) was highlighted by some for its comparability (accredited qualifications are currently available at five institutions in Germany, the Netherlands, Norway, Sweden and Switzerland).
45. The background to this consultation question relates to the UK Government's commitment to support recognition of professional qualifications (RPQ), or recognition arrangements between regulators or professional bodies in different countries, subject to fulfilling any other regulatory requirements.
46. A selection of the consultation feedback received on comparable non-UK qualifications is provided in the box below.

"I have not found one qualification that is comparable to the UK Level 6 dispensing qualification, in full. Generally, overseas dispensing qualifications generally focus on basic refraction and physics of cameras and photography, therefore the actual professional dispensing elements are not taught to the level required in the UK, and further training and assessments are required for applicants to go on the GOC register." (ABDO)

"We believe that the most likely qualifications to be comparable to ETR compliant GOC approved qualifications are those required for practice in Australia, New Zealand and South Africa, subject to the caveats raised in our response to question four. Doctorates from other countries may also (more than) meet the requirements, but it seems unlikely that such candidates would form a cohort large enough to warrant the full and regular mapping exercises required to assure ongoing equivalence." (The College of Optometrists)

"We do not feel there are any European countries where there is comparable activity or scope of practice. Even in countries such as the Netherlands which permits a greater scope of optometric practice, the lack of regulation and general variability in regulation removes assurance and presents significant risk...Outside of Europe, there are countries where there are comparable qualifications enabling a wide scope of practice such as Australia and the US but, again, there is some variability here. For example, in the US, whilst all

qualifications in Optometry are postgraduate qualifications, there are differences in their range and content depending on the state in which one studies. However, it appears that the scope of practice in all is at least equivalent to the UK.” (Association of Optometrists)

“Graduates from optometry programmes in the US, Australia, New Zealand, Canada and possibly South Africa may meet or exceed the requirements of ETR. Given that in the future, and unlike the present time, such individuals may be allowed to join the GOC register without the need for any additional training, a careful mapping exercise is required.” (European Council of Optometry and Optics (ECOO))

“Those degrees from the USA, Canada, Hong Kong, Australia and New Zealand should be comparable to GOC-approved qualifications in optometry.” (Aston University)

“The most obvious qualification is the European Diploma in Optometry which was always designed to be aligned to the competencies required for GOC registration without a qualifying year as specified by the College of Optometrist scheme for registration.” (Optometrist)

Conclusions

General comments

47. More responses were positive than negative towards proposals 1 and 2, and there was strong support for proposal 3.
48. Based on the qualitative feedback received, we consider there is sector support for an optional pre-assessment process managed by the GOC sitting alongside an education provider-led solution that does not involve any GOC assessment of applications. This could help to reduce the administrative burden for education providers and ultimately widen choice of providers and increase available places for applicants.
49. We do not consider that alternative options proposed by some respondents, in particular a standardised exam, are feasible, since the implementation costs would be excessive given the likely scale of demand.

Next steps: future management of applications for GOC registration from optical professionals who have qualified outside the UK

50. General principles:
 - a. All applications for GOC registration from optical professionals who have qualified outside the UK must meet the outcomes for registration, approved in February 2021. This must be at the equivalent minimum regulated qualification framework level 7 for optometrists and level 6 for dispensing opticians.
 - b. Routes for applicants to demonstrate they meet the outcomes for registration must:
 - be easy to understand for applicants, employers, registrants and the public;
 - be fair, accurate, provide a swift outcome, be administratively simple and cost effective (for applicants, employers and the GOC);
 - make the UK a more attractive place for optical professionals who have qualified outside the UK to work;
 - provide more competition in the marketplace for applicants and employers on price and quality of routes to registration; and
 - utilise the established expertise of providers of GOC approved qualifications in the assessment of the Outcomes.
51. In terms of next steps, we will now develop two alternative routes to registration for applicants who have qualified outside the UK:
 - a. successfully completing a GOC approved qualification which meets the ETR (either in the UK or overseas) with admissions handled directly

between provider and applicant and no GOC involvement in assessing applications (see detail below); or

- b. successfully completing a GOC managed direct assessment of the outcomes for registration leading either to direct entry to the register or access to a GOC approved qualification which meets the ETR (see detail below).
52. The purpose of the GOC managed direct assessment under option b above is to:
- check applicants' prior qualifications in optometry or dispensing optics;
 - check applicants' English language qualifications;
 - check applicants' potential compliance with GOC registration requirements / fitness to practise etc; and
 - assess by interview attainment against the Outcomes.
53. Providers may choose to include, or not to include, the GOC managed assessment as part of their admission requirements for approved qualifications designed specifically for applicants who have qualified outside the UK.
54. The GOC-managed assessment of the outcomes for registration will be a summative assessment of all the outcomes for registration (no RPL). The GOC will examine options for the delivery of this assessment. There will be a fee paid by applicants (or their employer) for this assessment, on a full cost recovery basis. Given the established expertise in the assessment of the Outcomes rests with providers of GOC approved qualifications, one option we will consider will be sub-contracting the applicant's assessment to one or more providers of GOC approved qualifications.
55. A GOC approved qualification which meets the ETR designed for applicants who have qualified outside the UK must be at the relevant RQF level and last no longer than one academic year unless any outstanding training required would reasonably exceed this period. This time period reflects the Professional Qualifications Act 2022, which places an obligation on regulators and others to not place unnecessary barriers in the way of international professionals wishing to work in the UK with the longest period of education and training required lasting no more than a year. Given that the Standards for Approved Qualifications do not specify a minimum credit volume, providers have considerable flexibility to design qualifications that can be adapted to suit the market, as long as all Outcomes are assessed as met (either through RPL², or assessment).

² Applies to eligible qualifications recognised in the publicly accessible guidance which in part meet the ETR. Qualifications that substantially fail to meet the ETR and/or are not recognised in the guidance are excluded from RPL decisions across all GOC qualifications.

56. To support both routes to registration, we will commission an analysis (publicly accessible guidance) that maps potential equivalent qualifications in certain overseas countries against the ETR. This will aim to identify qualifications and/or qualification systems that potentially might match or exceed the ETR and where subject to the necessary approvals, recognition of that qualification and/or qualification system could potentially offer direct entry to the GOC register³.
57. Where this analysis demonstrates a shortfall in expectations between the ETR and overseas qualifications and/or qualification systems, this gap analysis will assist providers of GOC approved qualifications in their decisions whether or not to admit an overseas qualified professional to a GOC approved qualification leading to entry to the register, and in their design of such qualifications.
58. The selection of qualifications in certain overseas countries against the ETR will be based on various factors including: the highest number of applications; those countries which the UK Government have signed a recognition of profession qualification agreement with; and countries whose requirements to become an optical professional are most closely aligned with ours based on the consultation feedback. In addition, the GOC will develop communications to help signpost non-UK optical professionals to the most appropriate route based on the commissioned analysis.
59. While there will be an implementation period as we develop our processes, please note there is no regulatory barrier other than our quality assurance and enhancement method (QAEM) processes to prevent education providers from running qualifications that would support non-UK professionals gain entry to the GOC register now. Similarly, there are no regulatory restrictions to prevent non-UK professionals from pursuing UK optical qualifications now.

Risk/benefit analysis of a GOC approved qualification / GOC managed direct assessment of the outcomes for registration

Potential benefits

60. From a provider's perspective, the approach offers an opportunity to develop responsive and high-quality approved qualifications to meet a growing market need and for existing approved qualifications to meet the needs of international applicants in a flexible and proportionate way. The duration of such qualifications may be significantly shorter than those traditionally offered to students with no prior experience or qualifications in optics, and providers may benefit from the international perspectives and experience applicants will bring to the programme. In addition, providers may benefit financially from the fees they might charge for the approved qualification they offer to international

³ On condition of a period of supervised practice once registered with the GOC.

applicants. Providers may also reduce their costs by opting to use the GOC managed assessment as part of their admission requirements.

61. From an applicant's perspective, optical professionals who have qualified overseas may benefit from the choice of either successfully completing a GOC approved qualification, or successfully completing a GOC managed direct assessment of the outcomes for registration.
62. In respect of a GOC approved qualification, applicants may benefit from a greater choice of approved qualifications and potential competition on price, price certainty, and academic offer. Applicants' transition to practice in the UK may benefit from the periods of professional and clinical experience organised by providers as part of the approved qualification offer, and in relation to optometry, limit delays currently experienced by professional trainees from overseas due to the shortage of training places and adaptation opportunities. Applicants may also benefit from the infrastructure and support provided to international students by UK providers, such as universities with established international student support programmes. In respect of a GOC managed direct assessment of the outcomes for registration, applicants who meet or exceed the ETR requirements may benefit from this direct route.
63. From an employer perspective, this approach may provide a straightforward method for employers to sponsor optical professionals who have already qualified overseas and who wish to undertake a GOC approved qualification in order to register with the GOC and work either as an optometrist or a dispensing optician in the UK. Notwithstanding the availability of visas, over which the GOC has no control, employers may be offered a greater choice of providers through which they may sponsor applicants' study, potentially offering greater time and cost certainty.
64. Applicants and their employers will also benefit from a choice between two alternative routes to registration, either by successfully completing a GOC approved qualification, or by successfully completing a GOC managed direct assessment of the outcomes for registration.
65. From the GOC's perspective this approach will mean that, from September 2026, we will manage an optional pre-assessment process as described above for applicants and providers, who may use the process as part of their admission requirements for approved qualifications designed specifically for applicants who have qualified outside the UK.
66. Patient and public benefit is anticipated to be twofold. First, the assessment of optical professionals who have qualified overseas will now be made against requirements which are up-to-date, have been widely consulted upon, and reflect contemporary expectations for future optical professionals, as opposed to the current, aged, handbook requirements. Second, the more streamlined

throughput of additional UK-registered optical professionals qualified to the same standard as UK trained optometrists and dispensing opticians will help meet anticipated patient demand and address reported workforce shortages.

Potential risks

67. The potential risks of a GOC managed pre-assessment / GOC approved qualification are:

- None or too few providers develop and successfully deliver qualifications to meet this market demand. If no provider chooses to do so there will be no route to registration for overseas qualified applicants;
- The costs (fees) of GOC approved qualifications for non-UK optical professionals and GOC pre-assessment processes are too high and are a disincentive to UK registration; and
- Inconsistency between providers in their admissions decisions, which may be influenced by commercial considerations. However, the GOC's quality assurance processes would be a mitigation against this risk. As a further safeguard, in relation to RPL we propose a requirement for providers to refer to the benchmarking guidance we will commission.