**Education and training requirements for specialist entry to the GOC register (additional supply, supplementary prescribing and independent prescribing)**

**Overview**

This consultation seeks your views on our proposals to update our requirements for specialist entry to the GOC register in the Additional Supply (AS), Supplementary Prescribing (SP) and/or Independent Prescribing (IP) categories.

**What are we seeking your views on?**

We are seeking your views on:

* Our proposed **Outcomes for Approved Qualifications for Specialist Entry to the GOC register (Additional Supply, Supplementary Prescribing and Independent Prescribing)** (‘outcomes for approved qualifications’) which describes the expected knowledge, skills and behaviours an optometrist must have for the award of an approved qualification for specialist entry to the GOC register in AS, SP and/or IP categories.
* Our proposed **Standards for Approved Qualifications for Specialist Entry to the GOC Register (Additional Supply, Supplementary Prescribing and Independent Prescribing)** (‘standards for approved qualifications’) which describes the expected context for the delivery and assessment of the outcomes leading to an award of an approved qualification for specialist entry to the GOC register in the AS, SP and/or IP categories.
* Our proposed **Quality Assurance and Enhancement Method for Specialist Entry to the GOC Register (Additional Supply, Supplementary Prescribing and Independent Prescribing)** (‘quality assurance and enhancement method’) which describe how we will gather evidence to decide in accordance with the Opticians Act 1989 whether a qualification for specialist entry to the GOC register in the AS, SP and/or IP categories meets our outcomes for approved qualifications and standards for approved qualifications.
* Our **outline impact assessment**, which describes our assessment of the impact of our proposals to update our requirements for approved qualifications for specialist entry to the GOC register.

These documents are available to download at the bottom of the Consultation Overview page.

**What will our proposals replace?**

Together, these documents will replace ‘A Handbook for Optometry Specialist Registration in Therapeutic Prescribing’ (published in July 2008) and the ‘Competency Framework for Independent Prescribing’ (published in 2011), including the list of required core competences, the numerical requirements for trainees’ practical experiences, education policies and guidance contained within the handbooks, and our policies on supervision and recognition of prior learning, which are published separately. You can read the documents we are proposing to replace here: [handbook](https://www.optical.org/download.cfm?docid=FEF31248-5503-482A-B462D47013D384C2) and [competencies](https://www.optical.org/download.cfm?docid=C455E50A-657E-4291-8BD5BA26ECE5B549).

**Why are we consulting?**

We would like to hear your views and receive evidence of the impact of our proposals to update our education and training requirements for GOC approved qualifications for specialist entry to the GOC register to ensure that the qualifications we approve in the future are responsive to the changing landscape in the delivery of eye-care services and fit for purpose in each of the UK nations.

Our proposals mitigate the risk that our current requirements (contained within our handbooks) become out of date.

The proposed outcomes and standards for approved qualifications and quality assurance and enhancement method together will ensure the qualifications we approve are responsive to the changing needs of patients and service-users and changes in higher education, not least as a result of the COVID-19 emergency, as well as increased expectations of the trainees, commissioners and employers.

**What have we consulted on previously?**

These proposals are based on our analysis of our responses to our Call for Evidence, Concepts and Principles Consultation 2017-2018, feedback from our 2018-2019 consultation on proposals stemming from the Education Strategic Review (ESR) and associated research, and our public consultation held in July-September 2020 on proposals to update our requirements for GOC approved qualifications leading to registration as an optometrist or a dispensing optician. For more information, please see the GOC’s consultation hub. For further information about the ESR, please visit the [ESR policy development and research page](https://www.optical.org/en/Education/education-strategic-review-esr/esr-policy-development-and-research.cfm).

**How have we developed our proposals?**

Our proposals have been guided by evidence-based policy making and draw upon best practice from other regulators, professional and chartered bodies. You can read our research, background and briefing papers [here](https://www.optical.org/en/Education/education-strategic-review-esr/esr-policy-development-and-research.cfm).

In preparing this document we were advised by an Expert Advisory Group (EAG) with input from the Quality Assurance Agency and feedback from a range of stakeholder groups including our Education Visitors, our Advisory Panel (including the Education Committee), the optical sector and sight-loss charities.

We would like to thank everyone who took the time to help us develop our proposals to ensure our proposed outcomes for approved qualifications, standards for approved qualifications and quality assurance and enhancement method protects and benefits the public, safeguards patients, and helps to secure the health of service-users.

You can read the EAGs’ terms of reference and membership [here](https://www.optical.org/en/Education/education-strategic-review-esr/expert-advisory-groups.cfm).

**What are our key proposals?**

|  |
| --- |
| **Key proposals** |
| a. Candidates will acquire a single qualification approved by the GOC leading to specialist entry to the GOC register in AS, SP and/or IP categories, instead of two GOC approved qualifications (gained either sequentially or simultaneously) currently required for entry to a specialty registration category (AS, SP or IP). |
| b. The approved qualification will be either an academic award or a regulated qualification at a minimum of Regulated Qualification Framework (RQF) (or equivalent) level 7. |
| c. There will be no proposed minimum/maximum or recommended time or credit volume for an approved qualification or specified location or duration of clinical experience, other than the requirement that an approved qualification leading to specialist entry to the GOC register in AS, SP and/or IP categories must integrate approximately 90 hours of learning and experience in practice. |
| d. Trainees upon application must have identified a suitably experienced and qualified designated prescribing practitioner (DPP) who has agreed to supervise their learning in practice. A trainee’s DPP must be a registered healthcare professional in Great Britain or Northern Ireland with independent prescribing rights and be an active prescriber competent in the clinical area(s) they will be supervising the trainee in, have the relevant core competencies, and be trained and supported to carry out their role effectively. If more than one registered healthcare professional with IP rights is involved in supervising a trainee, one independent prescriber must assume primary responsibility for coordinating the trainee’s supervision. That person will be the trainee’s DPP. In addition, we propose that there must be agreements in place between the trainee, their DPP and the qualification provider that describe their respective roles and responsibilities during periods of learning and experience in practice. These must be regularly reviewed and supported by management plans, systems and policies which prioritise patient safety. |
| e. The provider of the approved qualification must, in the design, delivery and assessment of an approved qualification, involve and be informed by feedback from a range of stakeholders including patients, employers, trainees, supervisors, members of the eye-care team and other healthcare professionals. |
| f. An outcomes-based approach is used to specify knowledge, skills and behaviours using an established competence and assessment hierarchy known as ‘Miller’s Pyramid of Clinical Competence’ (knows; knows how; shows how; and does), mapped to relevant external prescribing frameworks, including the draft Royal Pharmaceutical Society’s (RPS) Competency Framework for all Prescribers (2021). |
| g. Providers of approved qualifications are responsible for the measurement (assessment) of students’ achievement of the outcomes at the required level (on Miller’s Pyramid) leading to an award of an approved qualification. |
| h. Providers of approved qualifications will be responsible for recruiting and selecting trainees onto a programme leading to an award of an approved qualification. Recognition of prior learning can be deployed to assist the progression of trainees whose progress to specialist registration has stalled, and the requirement for optometrist IP trainees to have been registered for at least two years prior to commencing clinical experience / hospital placements has been removed. |
| j. At the point of retention, registrants in the AS, SP and/or IP categories will no longer need to supply details of prescribing decisions undertaken in the previous 12 months. |

**What do I need to do?**

If you are a member of the public, a patient or service-user, you may only be interested in reading our proposed outcomes for approved qualifications and answering questions 1, 2 and 3 in section 1 (which should take about five minutes to complete in addition to reading the document) along with questions in section 2 (which we are asking everyone to answer) about the impact of our proposals. However, you may well be interested in reading our proposals in full and answering all the questions we’ve asked in section 1.

If you are a GOC registrant, or an employer of GOC registrants, or you are responding on behalf of a provider of a GOC-approved qualification, a professional membership or third sector body, or another organisation or regulator, you may be interested in reading our proposals in full and answering some or all of the questions in section 1 (which should take about 15-20 minutes to complete in addition to reading the documents).

Towards the end there are some questions for everyone to answer about the impact of our proposals (section 2, which will take about five minutes to complete).

We recognise our proposals are detailed, with a range of impacts on different stakeholder groups, so if you wish to answer all the questions in both sections of the questionnaire, please do so.

Consultation data will be securely shared with our research partner for this work, Enventure Research, for independent analysis and reporting. We will be receiving data on a regular basis and will adjust our approach to engagement with the sector as guided by Enventure Research.

**Privacy statement**

The information you provide to us, the GOC (as data controller), will be processed and used in line with our statutory purpose under the Opticians Act as a public task in order to set standards for optical education and training, performance and conduct. For more information regarding how we process your data please see the full privacy statement on our website.

**Right to erasure**

Article 17 of the General Data Protection Regulations provides data with the right to erasure; this is known as the right to be forgotten. Right to erasure requests should be sent to the Data Protection Officer (FOI@optical.org) and will be responded to within one calendar month of receipt.

**Data controller**

We are registered as a data controller with the Information Commissioner's Office, registration number Z5718812. We are committed to maintaining robust information governance policies and processes to ensure compliance with relevant legislation. Any information you supply will be stored and processed by us or on our behalf, by approved and verified third parties, in accordance with the General Data Protection Regulations and the Data Protection Act 2018.

**Introduction**

It is helpful for us to know a little bit about you. If you do not wish to provide your name and email address you can leave Q1 and Q2 blank.

**1** What is your name?

Name [ ]

**2** What is your email address?

If you would like to receive further updates about our proposals please provide your email address.

Email [ ]

**About you**

In order to ensure we ask you the right questions, we would like to know a little more about you.

**1** Are you responding on behalf of an organisation?

(Required)

*Please select only one item*

[ ] Yes [ ] No

About your organisation

**1** On behalf of which organisation are you responding?

Please answer (Required)

[ ]

**2** Which of the following best describes your organisation?

(Required)

*Please select only one item*

[ ] Provider of GOC approved qualification(s) [ ] Optical professional body [ ] Optical business registrant [ ] Other optical employer [ ] Current CET or CPD provider [ ] Optical defence/representative body [ ] Optical insurer [ ] Commissioner of optical care [ ] Healthcare regulator [ ] Other (please specify)

If you selected ‘other’, please specify

[ ]

About you (continued)

**1** Knowing who you are helps us to ask you the right questions. Which category best describes you?

(Required)

*Please select only one item*

[ ] Member of the public [ ] Recent optical patient/service-user (or their carer) [ ] Optometrist [ ] Independent prescribing optometrist [ ] Trainee independent prescriber [ ] Dispensing optician [ ] Contact lens optician [ ] Optometry student [ ] Dispensing optician student [ ] Other (please specify)

If you selected ‘other’, please specify

[ ]

**Section 1: Consultation questions**

**1** Have you read the ‘Outcomes for Approved Qualifications for Specialist Entry to the GOC Register (AP, SP and IP)’ before answering the next two questions?

(Required)

*Please select only one item*

[ ] Yes [ ] No

**2** What impact, if any, will introducing the proposed ‘Outcomes for Approved Qualifications for Specialist Entry to the GOC Register (AP, SP and IP)’ have on the expected knowledge, skill and behaviour of future independent prescribing optometrists?

(Required)

*Please select only one item*

[ ] Very positive impact [ ] Positive impact [ ] No impact [ ] Negative impact [ ] Very negative impact [ ] Don’t know

**3** Is there anything in the criteria in the ‘Outcomes for Approved Qualifications for Specialist Entry to the GOC Register (AP, SP and IP)’ that is missing or should be changed?

(Required)

*Please select only one item*

[ ] Yes [ ] No [ ] Don’t Know

If you ticked ‘yes’ please provide details [ ]

**4** Have you read the ‘Standards for Approved Qualifications for Specialist Entry to the GOC Register (AP, SP and IP)’ before answering these questions?

*Please select only one item*

[ ] Yes [ ] No

**5** What impact, if any, will introducing the proposed ‘Standards for Approved Qualifications for Specialist Entry to the GOC Register (AP, SP and IP)’ have on the expected knowledge, skill and behaviour of future independent prescribing optometrists?

*Please select only one item*

[ ] Very positive impact [ ] Positive impact [ ] No impact [ ] Negative impact [ ] Very negative impact [ ] Don’t know

**6** Is there anything in the ‘Standards for Approved Qualifications for Specialist Entry to the GOC Register (AP, SP and IP)’ that is missing or should be changed?

*Please select only one item*

[ ] Yes [ ] No [ ] Don’t know

If you ticked ‘yes’ please provide details [ ]

**7** Have you read the ‘Quality Assurance and Enhancement Method for Specialist Entry to the GOC Register (AP, SP and IP)’ before answering these questions?

*Please select only one item*

[ ] Yes [ ] No

**8** Is there anything in the ‘Quality Assurance and Enhancement Method for Specialist Entry to the GOC Register (AP, SP and IP)’ that is missing or should be changed?

*Please select only one item*

[ ] Yes [ ] No [ ] Don’t know

If you ticked ‘yes’ please provide details [ ]

**9** To what extent do you agree with our proposal to replace our handbook for independent prescribing optometrists and related policies with the proposed ‘Outcomes for Approved Qualifications for Specialist Entry to the GOC Register (AP, SP and IP),’ ‘Standards for Approved Qualifications for Specialist Entry to the GOC Register (AP, SP and IP)’ and ‘Quality Assurance and Enhancement Method forSpecialist Entry to the GOC Register (AP, SP and IP)’?

*Please select only one item*

[ ] Strongly agree [ ] Agree [ ] Neither agree nor disagree [ ] Disagree [ ] Strongly disagree [ ] Don’t know

Please explain your response [ ]

**10** To what extent do you agree with our proposal that at the point of retention, registrants in the additional supply, supplementary prescribing and/or independent prescribing categories will no longer need to supply details of prescribing decisions undertaken in the previous 12 months?

Please select only one item

[ ] Strongly agree [ ] Agree [ ] Neither agree nor disagree [ ] Disagree [ ] Strongly disagree [ ] Don’t know

Please explain your response [ ]

**11** Is there anything else you would like to tell us about the education and training of future independent prescribing optometrists?

Please answer [ ]

**Section 2: Impact of our proposals**

We would like to ask everyone the following questions on impact of our proposals.

**1** We want to understand whether our proposals may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010. Do you think our proposals will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

(Required)

*Please select all that apply*

[ ] Age [ ] Disability [ ] Gender reassignment [ ] Marriage and civil partnership [ ] Pregnancy and maternity [ ] Race [ ] Religion or belief [ ] Sex [ ] Sexual orientation [ ] None of the above [ ] Don’t know

Please provide details [ ]

**2** We also want to understand whether our proposals may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010. Do you think our proposals will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please tick all that apply)

(Required)

*Please select all that apply*

[ ] Age [ ] Disability [ ] Gender reassignment [ ] Marriage and civil partnership [ ] Pregnancy and maternity [ ] Race [ ] Religion or belief [ ] Sex [ ] Sexual orientation [ ] None of the above [ ] Don’t know

Please provide details [ ]

**3** Do you think any of the proposed changes will impact – positively or negatively – on any other individuals or groups (for example, trainees, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

(Required)

*Please select only one item*

[ ] Very positive impact [ ] Positive impact [ ] No impact [ ] Negative impact [ ] Very negative impact [ ] Don’t know

**4** Please describe the impact and the individuals or groups concerned. We are particularly keen to understand further any financial or other impacts we haven’t considered in our accompanying impact assessment.

Please answer [ ]

**Further information**

**1** Can we publish your response?

(Required)

*Please select only one item*

[ ] Yes [ ] Yes, but please keep my name / my organisation’s name private [ ] No

**Equality, diversity and inclusion**

We welcome consultation responses from everyone, regardless of age, disability, gender reassignment, race, religion or belief, ethnicity, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity.

We don't want anybody to miss out or be disadvantaged because of the way we work and we try hard to make sure this doesn't happen. The following questions help us to understand who we are reaching with our surveys, so that we can make sure that everybody has the opportunity to get involved.

You do not have to answer these questions (just click ‘Prefer not to say’), but we would be grateful if you did. Your answers to these questions will be treated as confidential and held securely in line with data protection requirements. They will not be considered or published alongside your name or anything else that might identify you.

For more information about how we use information like this across the General Optical Council, please visit the Equality, Diversity and Inclusion section of our website.

**If you are responding on behalf of an organisation, please do not respond to these questions.**

1. Age

[ ] Under 25 [ ] 25-34 [ ] 35-44 [ ] 45-54 [ ] 55-64 [ ] 65+ [ ] Prefer not to say

2. Gender

[ ] Female [ ] Male [ ] Intersex [ ] Non-binary [ ] Prefer not to say

3. Gender identity

Is your gender identity different from the gender you were assigned at birth?

[ ] Yes [ ] No [ ] Prefer not to say

4. Sexual orientation

[ ] Bisexual [ ]Heterosexual/straight [ ] Gay/lesbian [ ] Other [ ] Prefer not to say

5. Marital status

[ ] Civil partnership [ ] Divorced or civil partnership dissolved [ ] Married [ ] Separated [ ] Single [ ] Widowed [ ] Prefer not to say

6. Ethnicity

[ ] White - English/Welsh/Scottish/Northern Irish/British [ ] White – Irish [ ] White - Gypsy or Irish Traveller [ ] Other White background (please specify) [ ] Black or Black British – Caribbean [ ] Black or Black British – African [ ] Other Black background [ ] Asian or Asian British – Indian [ ] Asian or Asian British – Pakistani [ ] Asian or Asian British – Bangladeshi [ ] Asian or Asian British – Chinese [ ] Other Asian background [ ] Mixed - White and Black Caribbean [ ] Mixed - White and Black African [ ] Mixed - White and Asian [ ] Other mixed background [ ] Other – Arab [ ] Other ethnic group [ ] Prefer not to say

If you have selected ‘other’, please specify [ ]

7. Religion/belief

[ ] No religion or belief [ ] Buddhist [ ] Christian (including Church of England, Catholic, Protestant and all other Christian denominations) [ ] Hindu [ ] Jewish [ ] Muslim [ ] Sikh [ ] Other (please specify) [ ] Prefer not to say

If you have selected ‘other’, please specify [ ]

8. Disability

The Equality Act 2010 defines disability as a physical or mental impairment which has a substantial long-term effect on a person's ability to carry out normal day to day activities. Do you consider yourself to have a disability?

[ ] Yes [ ] No [ ] Prefer not to say

9. Pregnancy/maternity

Are you pregnant, on maternity leave, or returning from maternity leave?

[ ] Yes [ ] No [ ] Prefer not to say

10. Carer responsibilities

Do you perform the role of a carer?

[ ] Yes [ ] No [ ] Prefer not to say