

COUNCIL

Education Strategic Review (ESR): outcome of the ESR consultation on education standards and learning outcomes

Meeting: 15 May 2019

Status: for noting and discussion

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Purpose

1. To consider the outcomes of the ESR consultation on the Education Standards and Learning Outcomes and to provide steers on a number of key questions, to inform further work with a view to a final decision being taken in July. The executive summary of the report is attached (**annex one**) and the full report is available [here](#).

Recommendations

2. Council is asked to:
 - **note** the outcomes of the most recent ESR consultation, considering key areas as outlined in paragraph 20;
 - **discuss** the findings;
 - provide **steers** on the following issues:
 - Council's wish to continue with the principle of a single, integrated route to registration (i.e. integrated clinical practice with academic study);
 - the need for a final national examination or a standardised assessment framework and definition of a 'safe beginner';
 - the need for a further round of consultation on revised learning outcomes;
 - the need to increase content on professionalism and clinical leadership and management;
 - the need to increase the clinical content of optical education and training;
 - timeframes for delivery, including a phased approach to implementation.

Strategic objective

3. This project supports our strategic objective to “Deliver a strategic review of optical education and training and implement changes to ensure that optical professionals are equipped for future roles.”

Risks

4. Risks related to optical education and training are that:

R1	There is a risk that the current system of optical education and training ceases to be fit for purpose due to the changing needs of patients, changing roles of optical professionals and wider changes in the delivery of healthcare across the four UK nations.	The purpose of ESR is to review and make recommendations on how the system of optical education and training should evolve so that registrants are equipped to carry out the roles they will be expected to perform in the future.
R2	There is a risk that the sector moves too slowly to react to the changing demands or too fast to enable education providers to implement changes safely and appropriately.	We must consider timeliness in our project plan and decisions, including considering the possibility of phasing.
R3	There is a risk of dependency on key contextual and sector-wide developments that are outside of the GOC’s regulatory remit and therefore outside of the scope of ESR.	We have a clear project scope and we must always consider the role of a regulator, noting the context in which we regulate. We should encourage the sector to lead on areas outside of our remit.
R4	There is a risk that key stakeholders’ views or perceptions contradict the evidence related to optical education and training.	We are committed to ensuring that any recommendations for change are based on sound evidence, and that we make decisions in the interests of the public.

Background

5. The purpose of the ESR is to review and make recommendations on how the system of optical education and training should evolve so that registrants are equipped to carry out the roles they will be expected to perform in the future.
6. We started the review with a call for evidence and published a summary report (June 2017). We then commissioned research into patterns and trends in health professional education in the UK and internationally (November 2017) and carried out research exploring the perceptions of newly qualified practitioners and employers in relation to current education and training requirements (June

2018). We then consulted on the concepts and principles that should inform the education and training model and published an independent summary report (April 2018)¹. We proceeded to develop draft Education standards for providers and Learning Outcomes for students.

7. Throughout the ESR and during the development of the education standards and learning outcomes, we have carried out extensive engagement with stakeholders, including education providers and employers, commissioners, professional bodies, government health and social care Boards, our ESR Expert Advisory Group, CET reference group and GOC advisory committees.

The case for change

8. We identified key drivers for changes in the education and training of optical professionals. Drivers included ensuring that registrants respond to changes in the:
 - needs of patients (for example, the impact of an ageing population and the increasing prevalence of certain long-term conditions and co-morbidities);
 - roles of optical professionals (which are changing due to numerous factors – for example, changes in technology, and clinical leadership expectations, end to end case management); and
 - delivery of healthcare across the four UK nations (due to service delivery pressures, contracts, tariffs and outcome measures).
9. The case for change has been made by numerous and varied stakeholders, including concern that:
 - newly qualified registrants are not sufficiently prepared to practice (employers' and trainees' perspective);
 - supervision and pre-registration support are inadequate (students' perspective);
 - regulator is restricting innovation through being too prescriptive (education providers' perspective);
 - individual progress throughout the routes to registration is not clear and significantly different pass rates between academic and qualifying exam(s) suggest that education, training and practice are not aligned (GOC's perspective); and
 - current 'national exams' are not agile and prevent education from developing to match current practice (education providers and employers' perspective).

¹ We have published all the documents referred to in this paragraph on our website: <https://www.optical.org/en/Education/education-strategic-review-esr/>

Concepts and principles consultation

10. The key findings from this extensive consultation suggested strong support for the concepts that we were exploring. This included:
- outcomes-focused education standards for providers – to be less prescriptive and thereby enable greater agility and innovation for education providers;
 - standards of practice informing our education requirements – so students learn what behaviours will be expected from them in practice from an early stage in their education;
 - changing from competencies to broader learning outcomes, to address deficiencies in the current framework and to afford education providers more flexibility over how they deliver their programmes. On the proviso that the risks of greater variability in, or a lowering of, standards is managed through effective quality assurance;
 - earlier and more varied, high-quality clinical experience within education programmes;
 - more multi-disciplinary learning to prepare students for multidisciplinary health delivery; and
 - GOC to develop a risk-based, evidence-led and proportionate approach to approval and quality assurance in order to ensure that providers comply with the education standards.
11. There was also support for a national registration exam as part of the route to registration which many respondents viewed as a continuation of the current assessments provided by the College of Optometry and ABDO Exams.

Development of draft education standards and learning outcomes

12. We developed draft education standards for providers and learning outcomes for students, taking into account the findings of the previous consultation and the significant input we received subsequently from our Expert Advisory Group, CET Reference Group, Education committee, Standards committee and Companies committee, and external stakeholders.
13. We sought to explore how to incorporate the key concepts and principles in practice, acknowledging that whilst many agreed with the principles we expected there to be significant areas of disagreement in the sector around key topics.
14. Key objectives of the draft education standards and learning outcomes were to:
- be less prescriptive and more outcomes-focused in setting our education standards for providers;
 - ensure flexibility to accommodate future changes in scopes of practice and therefore be less prescriptive and more outcomes-focused in setting learning outcomes for students;

- improve the student journey through the whole route to registration and ensure clear accountability of those responsible for delivering it; and
 - promote a culture of reflective practice and clinical leadership within the sector.
15. Council approved a public consultation on the draft education standards and learning outcomes. This was launched on 12 November 2018 – 25 February 2019.
16. Alongside the consultation questions, we also published an impact assessment framework to help respondents to understand what we are seeking to achieve, draw out some of the key questions still to be answered and seek specific views on issues, risks and impacts which need to be considered now, in order to identify the next steps for the ESR.

Analysis

17. The consultation documentation is attached for Council's consideration and advice.
18. The following key themes emerged:
- the need to balance prescriptive vs principled regulation (to allow for changing scopes of practice but ensure consistency in outcomes)
 - some respondents did not understand or did not agree with the case for change or the evidence base. Some felt that tweaking our current standards would be enough to meet the demands of the future;
 - some respondents believed that the funding implications of the changes would need to be better understood and addressed to progress some of the changes
 - there were concerns regarding the challenges involved with increasing external placements in terms of cost, scale and management;
 - there were concerns over the quality and quantity of supervision and supervisor availability;
 - there were mixed views regarding student registration and whether it is in the public interest or not;
 - there was a strong view that the draft learning outcomes were not fit for purpose, most respondents wanting to see more detail; and
 - there was additional concern regarding implementation timescales.
19. We presented the report to Education Committee, who gave the following advice:
- there is strong disagreement in the sector that the learning outcomes are fit for purpose and further work will need to be done to define what a safe beginner looks like;

- there are gaps in accountability across the routes to registration, which need to be addressed, particularly between the academic and clinical experience elements in which the quality and quantity of supervision and placements remain a problem. There should be a more robust feedback loop to improve standards of education and training and ensure accountability is clear;
 - clinical content needs to be considered alongside specialist qualifications with the view to considering which areas should be included in undergraduate study and are required for a safe beginner, and which should remain as specialist qualifications;
 - there will be more divergence of practice across the UK, and this should be taken into consideration when deciding whether the GOC regulates via prescription or via principles;
 - student registration seems to be only in the public interest once students start clinical placements; and
 - funding remains a concern and without clinical degree status, it is unlikely that any further funding will be available for undergraduate courses.
20. In order for the Executive to prepare our detailed response to the consultation and to present options for Council to consider in July 2019, we ask Council to provide feedback on the following areas:
- Council's wish to continue with the principle of a single, integrated route to registration (i.e. integrated clinical practice with academic study);
 - the need for a final national examination or a standardised assessment framework and definition of a 'safe beginner';
 - the need for a further round of consultation on revised learning outcomes;
 - the need to increase content on professionalism and clinical leadership and management;
 - the need to increase the clinical content of optical education and training;
 - timeframes for delivery, including a phased approach to implementation.

Impacts

21. The following implications have been identified:
- legislation – the Opticians Act stipulates restricted functions of each type of registrant. This restricts some aspects of scope of practice within the sector. Student registration is also a requirement of the Opticians Act;
 - There is no impact on reserves;
 - resources and budget - the resources and budget for this project are as included in the business plan and budget;
 - equality, diversity and inclusion and Human Rights Act – the ESR seeks to respond to growing needs in the sector including an ageing population, the need for improved communication skills, to deal with vulnerable patients and to attract and support students of all backgrounds to complete the

route to registration. These topics are being explored within our impact assessment;

- devolved nations: any education standards and learning outcomes will apply across all nations and differences in requirements will be explored within the ESR.

Communications and timeline for future work

22. We are designing a one-page ESR summary to clarify its scope and outputs more clearly for all stakeholders to be published by June 2019.
23. We will write a response paper to the consultation and we will seek Council's agreement to next steps in July's Council meeting.
24. It is important to note that the case for change remains – this includes the urgency for ensuring optical education is fit for the future, and that change in the sector will take a number of years to implement fully.
25. We are committed to ensuring that, when making any decisions, there is a sufficient period of notification and implementation, particularly for education providers but also for CET providers who will need to respond to any changes in undergraduate education and training and continue to support clinical skills development for the current workforce.

Attachments

Annex one: ESR consultation report – Executive summary

Annex two: ESR consultation report – Full report – [published here](#)

Analysis of responses to the public consultation on Education Standards and Learning Outcomes

Executive Summary

General Optical Council
March 2019



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Executive Summary



I. Executive Summary

I.1 Introduction

As the regulator for optometrists and dispensing opticians, the General Optical Council (GOC) is responsible for setting the standards for optical education. The GOC is currently conducting an Education Strategic Review (ESR) and as part of this has developed new draft Education Standards and Learning Outcomes. A public consultation on these draft standards and outcomes was opened on 12 November 2018 and closed on 25 February 2019. A total of 498 responses to the online survey were received along with 41 emails/letters.

This report provides independent analysis of the consultation responses.

I.2 Key findings

Opportunities and impacts

Respondents were asked for their views on opportunities and impacts (including equality, diversity and inclusion) arising from the content of the draft Education Standards and Learning Outcomes, and how they could be mitigated.

- Respondents identified more impacts than opportunities
- The key opportunities identified included the flexibility of an outcomes based approach and the likelihood of this leading to more innovation/updating of course content
- The emphasis on more practical experience for students was also welcome
- Many respondents questioned the evidence base/benefits of the integrated approach
- Key impacts included a risk of lower standards due to the outcomes being interpreted differently across different providers and the responsibility for assessment also being in the hands of providers
- Many respondents wanted to retain an independent final examination/assessment
- Implementing more/varied student placements has implications in terms of funding, would be difficult to manage for education/training bodies and placement providers, and would negatively impact students due to the increased requirement to travel.

Responding to the key themes of the Concepts and Principles of ESR

Respondents were asked to what extent they believed the draft Education Standards and Learning Outcomes addressed the key themes of the Concepts and Principles of ESR.

- 43% of respondents believed that the standards and learning outcomes either fully (or partially) addressed the key themes of the concepts and principles of ESR
- Separate outcomes for optometrists, independent prescribing optometrists, dispensing opticians and contact lens opticians were welcome.
- 31% of respondents believed that the standards and learning outcomes did not address the key themes of the concepts and principles of ESR

- Respondents who disagreed were concerned about the ‘vagueness’ of the outcomes and standards and questioned how they would be applied and assessed consistently
- Respondents reiterated concerns around the proposed transition to a single set of outcomes

Comments on the draft Education Standards and Learning Outcomes

Respondents were asked for their comments on the draft Education Standards and Learning Outcomes, including their views on completeness, the language used, structure or flow.

- Some respondents were positive about the completeness and flow of the document, whereas others found the language overcomplicated
- Areas where respondents would have liked to have seen more detail included CPD, implementation, quality assurance processes, support provided to students and educators, and the role of extended primary eye care services
- A number of professional bodies and education/training providers have provided detailed feedback for the GOC to consider on the wording and technical scope of specific outcomes
- Examples of best practice that the GOC could refer to included similar publications by the General Dental Council and General Pharmaceutical Council.

Views on whether the draft Education Standards and Learning Outcomes are fit for purpose

Respondents were asked whether, overall, they thought that the draft Education Standards and Learning Outcomes were fit for purpose.

- 71% of respondents disagreed that the draft Standards and Learning Outcomes are fit for purpose
- Fundamental concerns about the proposed shift to the integrated model and lack of independent assessment led many to state that they could not support the draft Education Standards and Learning Outcomes in their current form and further engagement with stakeholders was required.
- Those who were in agreement welcomed the opportunity the draft Education Standards and Learning Outcomes offered to update the profession and the emphasis on ‘soft skills’ and increased placement experience for students

Views on the timescale for implementation

Respondents were asked whether they thought the proposed timescale for implementation was realistic and to identify any risks or concerns in meeting this.

- 19% of respondents stated the timescale was realistic, 39% said it was unrealistic, and 36% were unsure
- The issue for many respondents was that they felt that it was not possible to have a view on the timescales until the draft Education Standards and Learning Outcomes were finalised

- Some respondents felt that there was a risk of the timescale being too long and the profession could become ‘out of date’.
- Education and training providers felt that the transition period would be very challenging and a staged approach with clear support and guidance from the GOC would be essential.

Views on linking the Learning Outcomes to CET

Respondents were asked whether or not they supported the GOCs proposal to link the Learning Outcomes to CET, and for their views on the benefits and the barriers to this approach.

- 45% of respondents supported this approach, 28% did not and the remainder were unsure/did not respond
- The main benefits of this approach included increased flexibility for registrants to tailor learning to their interests
- The main areas of concern were that core competencies could become neglected or that registrants would stick to topics in their comfort zone
- Dispensing opticians took the opportunity to express their dissatisfaction with regards to lack of funding
- Other issues noted included the availability/accessibility of relevant CET courses/materials and the need to ensure that learning formats are flexible to accommodate professionals with different needs or those in rural areas.

Views on continuing GOC student registration

Respondents were asked to identify the implications for GOC student registration of introducing the new Education Standards and in particular the opportunities and risks of no longer requiring students to register.

- Many respondents (including students) believed that there was a strong argument for retaining student registration
- Key reasons for this included the fact that registration encouraged students to have a clear understanding of their responsibilities and that this promoted professionalism/protected the public – particularly if students were to have more placements
- Reasons for not supporting student registration included reducing the financial burden on students, and the view that the profession was out of step with other health professions who did not require this
- Others felt that students are already closely supervised and that it was sufficient for universities and placement supervisors to carry out this role.