

COUNCIL

Non-EEA route to registration for optometrists

Meeting: 9 May 2018

Status: for decision

Project Sponsor: Alistair Bridge (Director of Strategy)

Project Director: David Rowland (Head of Policy and Research)

Project Manager: Marie Bunby (Policy Manager)

Project Board: SMT

Project team members: Michelle Norman (Head of Registration)

Purpose

1. The purpose of this paper is to update Council and outline our recommendation for a new route to registration for optometrists who have qualified outside of the European Economic Area (EEA) (hereinafter referred to as 'non-EEA').

Recommendations

2. Council is asked to **approve** the recommendations to:
 - 2.1 introduce a new non-EEA route to registration for optometrists as of 4 June 2018, which will involve the mapping of applicants against the GOC's stage 1 and stage 2 competencies, an interview, further academic training if required, then the full Scheme for Registration operated by the College of Optometrists (described in this paper as option four), conditional on a suitable agreement with the College being in place; and
 - 2.2 introduce a further fee of £200 for applicants who are approved to progress to the interview stage of the new route to registration.

Strategic objective

3. This project is part of our wider review of non-UK registration processes. The specific purpose of this work is to ensure that our approach to registering non-UK applicants (EEA and non-EEA) is fit for purpose in complying with existing legislation and ensuring that non-UK applicants are safe to practise before joining the register.
4. This project contributes to our purpose of protecting and promoting public health and safety by helping to achieve our strategic objectives in the 2017-20 strategic plan regarding learning and development of optical professionals, so that patients can be assured that non-UK qualified registrants meet the UK requirements for registration and are safe to practise.

Risks

5. In order to protect the public we need to have a route to registration for non-EEA optometry applicants that allows onto the register only applicants who have been able to demonstrate that they meet the UK standards of competence. The route to registration needs to be supported by policies and procedures that are robust and defensible.
6. There are also risks specific to our proposed approach to assessing optometry applicants from outside the EEA that are outlined in paragraphs 16-17 of this paper.

Background

7. The College of Optometrists previously provided the non-EEA route to registration on our behalf, holding a non-EEA examination twice a year. The College held the last examination in June 2017. The College decided not to continue providing the examination, having recognised that it required updating to bring it into line with its approach to assessing UK applicants. It was necessary, therefore, for us to develop a new route to registration and the College has provided helpful input during the course of the project.
8. We initially planned to introduce a new theoretical and practical assessment to test the GOC's stage 1 competencies¹ (referred to as option two in paragraph 12). Applicants would have had to successfully complete this assessment prior to entering on to the College of Optometrists' Scheme for Registration.
9. Throughout May to December 2017 we worked to appoint an external provider to undertake the assessment of stage 1 competencies. We advertised a tender and received bids from two university optometry providers which would have involved a two day theoretical assessment and a three day practical assessment. We interviewed both and started contractual negotiations with one of them, but unfortunately were unable to decide on terms and conditions that were agreeable to both parties.
10. We considered offering the contract to the other bidder, but we did not feel that this was a viable financial option as the bid from the other university would have meant significantly higher costs for both the GOC and individual applicants than the bid from the university we had been negotiating with.
11. We also considered re-tendering for a full assessment of stage 1 competencies, but decided this was not a viable option given what we already knew about the small amount of interest from universities and that we needed to have a route to registration in place as soon as possible. We had also learnt through the tender

¹ The GOC's stage 1 and 2 competencies are set out in the GOC's *Accreditation and Quality Assurance Handbook: Routes to Registration in Optometry*, which describes the knowledge and skills that an optometry registrant must possess in order to register with us and practise in the UK.

process that running the assessment would be unlikely to be profitable without significant subsidy from the GOC given the small number of non-EEA applications received each year and that this process would be burdensome and costly for the applicant, with a five day assessment period (prior to the full Scheme for Registration).

Analysis

Options available to us

12. In January 2018 SMT gave approval to cease contract negotiations and we reviewed our options for a revised route to registration as follows:
 - 12.1 option one: do nothing – this is not an option given that our legislation obliges us to have a process in place to consider applications within three months of receipt;
 - 12.2 option two: full theoretical and practical assessment of stage 1 competencies, followed by the Scheme for Registration – this was the option that we tendered for and so was discounted for reasons of cost and feasibility as outlined in paragraphs 10-11 above;
 - 12.3 option three: mapping of applicant against stage 1 and stage 2 competencies, applicant interview, partial practical assessment of stage 1 competencies and full Scheme for Registration;
 - 12.4 option four: mapping of applicant against stage 1 and stage 2 competencies, applicant interview, further academic training if required then full Scheme for Registration; and
 - 12.5 option five: bespoke route including mapping of applicant against stage 1 and stage 2 competencies, further academic training if required, completion of the full Scheme for Registration if required or progress straight to entry to the register.

Comparison of options

13. The table below sets out a comparison of each of the remaining feasible options (three-five), looking at the following criteria: burden and cost to applicants, cost to the GOC, proportionality, risk to patient safety and feasibility, with double weighting for patient safety given that our overriding objective is to protect the public. The lower the score against each criterion, the better the option is considered to be.

Area	Options		
	THREE (partial assessment and full Scheme)	FOUR (full Scheme)	FIVE (bespoke route)
Burden and cost to applicant	4	3	1
Cost to the GOC	3	1	1
Proportionate	4	3	1
Risk to patient safety	1 x 2 = 2	2 x 2 = 4	4 x 2 = 8
Feasibility	4	1	1
Total	17	12	12

Preferred options and feasibility

14. Our preferred option to implement as our route to registration is **option four**. This is set out in the flowchart in **annex one** and the main stages of the route are outlined in **annex two**. The College has confirmed that this route is feasible to implement without delay, subject to putting in place a memorandum of understanding to clarify our respective roles and responsibilities.
15. Having compared option four to the other options in the table above, we consider that this option is the most appropriate for the following reasons:
- 15.1 burden and cost to applicant: while not the least burdensome or costly option for applicants, it is less burdensome and costly than option one, which would have involved a practical assessment of our stage 1 competencies. While applicants will be required to complete the full Scheme for Registration, many employers will fund the cost of the Scheme, meaning that applicants will not necessarily have to bear this themselves;
- 15.2 cost to the GOC: it is a low cost option for the GOC (scoring the same as option five) – the development costs are low (less than £2,000) as it only involves development of an applicant interview;
- 15.3 proportionality: while this option might be considered to be disproportionate for applicants who are already at or above the UK standard, this option allows us to assess all applicants against the same standard and gain assurance that they can demonstrate the required competencies. Also, the Scheme for Registration is designed to be flexible enough to allow for the assessments to be held at times appropriate for the individual trainee depending on their progression through the Scheme, with the final OSCE taking place four times a year. This has meant that some trainees have been known to finish the Scheme in as little as nine months, whereas others can take up to 18 months; and

- 15.4 risks to patient safety:
 - 15.4.1 this option provides assurance in relation to patient safety as our assessors (who also deal with applications from optometrists applying from within the EEA) have significant experience of mapping individuals' qualifications and experience against the UK standards of competence and then making recommendations about further training where gaps are identified and will be following the same process that they follow when considering EEA applications;
 - 15.4.2 further assurance is provided by the fact that all applicants, even those who are considered to be at or above the UK standards of competence, will be required to complete a practical assessment in a UK work-based environment through the Scheme for Registration, thereby giving us sufficient assurance of their practical skills as well as of their training and experience; and
 - 15.4.3 it safeguards patient safety as we will require applicants to have practised for at least one of the last ten years or have current registration with a regulatory body in their own country and, through the Scheme for Registration, applicants will gain experience of practising in the UK under supervision prior to entry to the register.

- 16. As with any option there are always risks involved. The key risk with this route to registration being that applicants will not undergo a practical assessment prior to entering the Scheme for Registration. The points below will help to mitigate this risk:
 - 16.1 our non-UK assessors are trained to carry out a detailed mapping process against the UK standards and will ensure that only those who are competent in the stage 1 competencies will progress to the full Scheme for Registration (at which point the applicant will work under supervision as part of the Scheme). They will also have the opportunity to undertake an online interview with the applicant to discuss their application form. We have developed detailed guidance for our non-UK assessors in mapping an applicant's qualifications and experience against the UK standards of competence and an interview guide;
 - 16.2 our non-UK assessors are already experienced in mapping qualifications and experience with EEA applicants under the relevant European directive and it is reassuring that of the 293 registrants currently under investigation, only one per cent (three cases) are EEA applicants. Currently 1.14 per cent of EEA applicants on the register are under investigation compared with 0.97 per cent of UK applicants; and
 - 16.3 applicants entering the Scheme for Registration will be registered as a student with the GOC and will be under supervision by a College-appointed supervisor who would be able to identify and deal with any issues quickly, as is the case with UK graduates on the Scheme.

17. There is also a risk that if an applicant is required to undertake further academic training which they then undertake outside of the UK, we would not be able to quality assure that training in the same way that we would if the applicant had undertaken the training within the UK. This risk will be mitigated by the fact that any applicant that undertakes further academic training outside the UK is required to go back through the assessment process so that their qualifications and experience can be mapped against the UK standards by an assessor. We would then further ensure patient safety by requiring that applicant to complete the Scheme for Registration before being allowed entry to the register.
18. We have also developed an information sheet for potential applicants, so that as well as understanding the GOC's requirements, they can consider the requirements for working in the UK and understand the contractual arrangements for providing NHS sight tests across the different nations.
19. We will review how the process is working after it has been in operation for a year, as well as regularly reviewing progress through quarterly updates with the College of Optometrists and seeking feedback from employers. This will enable us to deal with any issues as they arise.

Recommendation

20. We are recommending that we should implement option four as of 4 June 2018.

Applicant fees

21. Non-EEA applicants will already be required to pay £110 as an initial scrutiny fee and £405 for our assessors to fully map the application. The new route introduces an applicant interview into the process. We have costed the applicant interview at £200 per applicant and are asking for Council's approval to introduce this fee as of June 2018 for applicants who are identified as appropriate to progress to the interview. The College of Optometrists is responsible for setting the fees for the Scheme for Registration and charging individual applicants, and these fees will have to be paid in addition.

Impacts

22. The following implications have been identified:
 - 22.1 Reserves – we do not think that we will require any reserves to fund this process but if any are required these will come out of the Registration budget.
 - 22.2 Budget – we have not identified any issues in relation to the budget.
 - 22.3 Legislation – this project does not require any changes to our legislation.
 - 22.4 Resources – we consider that this project is appropriately resourced.

- 22.5 Equality, diversity and inclusion (EDI) – we have carried out an impact assessment and the proposals are considered to be EDI neutral i.e. they do not impact on any groups with protected characteristics.
- 22.6 Human Rights Act – we have not identified any issues relating to an individual's human rights.
- 22.7 Sustainability – we have not identified any issues relating to sustainability.

Devolved nations

- 23. We do not believe that our proposals for the project have any specific implications for the devolved nations, given that this is about assessing applicants from outside the EEA. We are producing an information sheet for applicants which details the different requirements for carrying out sight tests across the nations of the UK.

Communications

- 24. We intend to update potential applicants about the new non-EEA process, with a view to a new process being in place by 4 June 2018. We will ensure that our website updates any interested stakeholders in the proposals for the route to registration for non-EEA optometrists. We will also notify employers so that they are aware of the new process.
- 25. We will continue to work with the College of Optometrists to ensure that they are involved in implementation of our proposals.
- 26. We will continue to keep Education Committee, Registration Committee, Companies Committee and Standards Committee informed and seek their advice as appropriate following implementation.

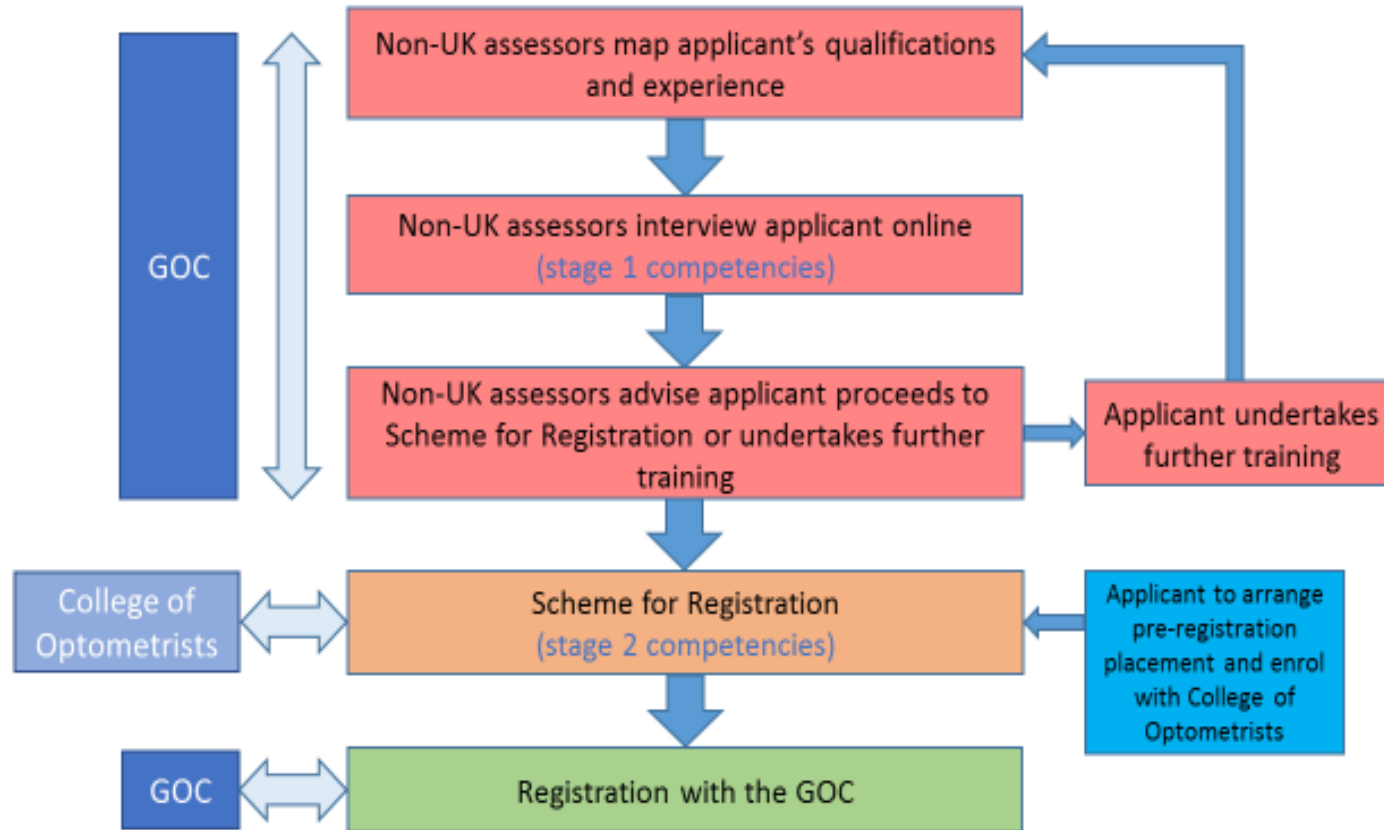
Timeline for future work

- 27. We intend to finalise the documentation for the non-EEA process in May 2018 and introduce the route to registration by 4 June 2018.
- 28. We will need to keep this route to registration under review (together with the route to registration for EEA optometrist applicants and the routes to registration for EEA/non-EEA dispensing optician applicants) in the light of the outcome of our Education Strategic Review and the progress of BREXIT.

Attachments

- Annex 1 – Flowchart: route to registration for non-EEA optometrists
- Annex 2 – Overview of stages of route to registration

Flowchart: overview of route to registration for non-EEA optometrists



Overview of stages of route to registration

- Stage one: Initial scrutiny of the application by the Registration team to ensure that it is complete and contains all relevant supporting documents.
- Stage two: Our non-UK assessors map the applicant's qualifications and experience against the GOC's stage 1 and stage 2 competencies and patient contact requirements², advising whether the applicant can proceed to an online interview where their application will be discussed further to clarify any points of uncertainty (NB this will not be a pass/fail interview).
- Stage three: If an applicant does not meet all of the stage 1 competencies they will be required to undertake further academic training prior to completion of the Scheme for Registration.
- Stage four: Where an applicant has met the stage 1 competencies, they will be required to successfully complete the full Scheme for Registration.
- Stage five: Upon successful completion the Scheme for Registration, the applicant meets the GOC's requirements for registration and enters the register.

² As set out in the GOC's *Accreditation and Quality Assurance Handbook: Routes to Registration in Optometry*