

## COUNCIL

### Education: Approval and Quality Assurance

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**Meeting:** 10 July 2019

**Status:** For decision

**Lead responsibility:** Subo Shanmuganathan, Director of Education

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### Purpose

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1. This paper presents recommendations from Education for three applications of provisional approval and one application of full approval for various education programmes.

### Recommendation

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2. Council is asked to grant:
  - **provisional approval** to the following programmes:
    - a new programme providing two registrable qualifications in optometry and in ophthalmic dispensing at the University of Central Lancashire (UCLan);
    - a new optometry programme at the University of Huddersfield; and
    - a new therapeutic prescribing programme at the University of Hertfordshire; and
  - **full approval** to the University of Hertfordshire's Master of Optometry programme.

### Strategic objective

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3. The paper relates to our targeted approach to regulation – to achieve our strategic objective we must apply our regulatory levers proportionately to ensure protection of the public.
4. Through the process of approving and quality-assuring optical education, training and assessment, we seek to ensure that registrants joining the fully-qualified register have the requisite skills, knowledge and behaviour to be fit to practise.

### Risks

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5. The main risk associated with the approval and quality assurance function is that failure to deliver an effective approval and quality assurance function could negatively impact public safety and it could expose the GOC to legal and reputational risks.

## Background

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6. Section 12(7) of the Opticians Act 1989 (“the Act”) empowers Council to approve establishments and/or qualifications for training as an optometrist or dispensing optician (referred to as providers and programmes respectively). Sections 12(1) and 12(6) require Council to establish minimum competencies and educational content, and to notify these requirements to approved establishments. Section 13 makes provision for ongoing supervision and potential withdrawal of approval.
7. Section 2(1) requires Council to establish an Education committee for the purpose of giving advice and assistance on matters relating to optical training, education and assessment.
8. The GOC appoints Education Visitor Panel (EVP) members to provide advice and recommendations regarding programmes, including whether they would recommend that a programme is granted provisional or full approval status.
9. The GOC's requirements for providers delivering GOC approved programmes are set out in our handbooks. At present, a specific list of approval requirements (that a provider must have in place before it is granted provisional approval) does not exist. Creating a definitive list would reinforce a prescriptive approach which is input focused and would also stifle diversity and flexibility of programme delivery.
10. Programmes are considered by the visitor panel against the requirements and the panel is constructed purposefully using EVP members with differing skills and expertise. This scope of knowledge allows the Panel to consider all aspects of the programme holistically.
11. The Panel will consider how the programme meets, or aims to meet, all of the requirements rather than simply conducting a perfunctory exercise that results in bureaucratic expediency.
12. We utilise the professional judgement of those assessing the programme to determine whether it is ready to be granted provisional or full approval. The EVP will take into consideration all aspects of the programme and its development at the time of the visit, this includes all clinical and academic aspects as well as reviewing the risks of the programme and how the provider intends to mitigate those risks.
13. In the event that the EVP find evidence of unmet requirements, they will consider the plans and progress completed by the provider and the proposed timeline before exercising their professional judgement on the overall assurance of the programme.
14. Council retains authority to make the decision to grant and withdraw GOC approval to/from a provider or programme.

**Applications for provisional approval****University of Central Lancashire (UCLan): BSc (Hons) Ophthalmic Dispensing and MSci Optometry**

15. UCLan is a training provider that is wishing to deliver a MSci Optometry programme, with entry points at level four and level seven. The programme provides a dispensing and an optometry route to registration and will offer two registrable qualifications: a BSc (Hons) in Ophthalmic Dispensing and a MSci in Optometry. In line with the Opticians Act 1989, the GOC has considered granting approval to these two qualifications.
16. The University is proposing to deliver the training element of the route of registration. Students attending the programme will complete the route to registration with the Association of British Dispensing Opticians (ABDO) and the College of Optometrists respectively.
17. UCLan aims to begin delivery of the programme in September 2019 (subject to Provisional Approval being approved by Council) with an initial intake of 40 students for the first Level four (dispensing) cohort and 20 students for the first Level seven (optometry) cohort.
18. The programme obtained internal validation from the University on 21 March 2019. A GOC approval visit was undertaken by an EVP on 25 – 27 March 2019.

**University of Huddersfield: BSc (Hons) Optometry**

19. The University of Huddersfield has applied to be a training provider delivering a BSc (Hons) Optometry programme.
20. The programme is a three-year BSc programme encompassing all GOC Stage One Core Competencies and patient episodes. Students will complete the Scheme for Registration with the College of Optometrists following graduation before entering the GOC register.
21. The University aim to begin delivery of the programme in September 2019 (subject to Provisional Approval being awarded by Council) with an initial intake of 30 students for the first cohort.
22. A GOC approval visit was undertaken by an EVP on 16 – 17 May 2019.

**University of Hertfordshire: Therapeutic Prescribing for Optometrists**

23. The University of Hertfordshire is an established training provider currently delivering Optometry under provisional approval and is now seeking to deliver a Level seven Certificate in Therapeutic Prescribing for Optometrists programme.
24. The University is proposing to deliver all theoretical elements of training for Independent Prescribing. Students will be required to complete a clinical

placement and Common Final Assessment (CFA) with the College of Optometrists before qualifying to join the specialist register.

25. The University aims to begin delivery of the programme in January 2020 (subject to Provisional Approval being awarded by Council) with an initial intake of 15 students for the first cohort.
26. A GOC approval visit was undertaken by an EVP on 21 May 2019.

### Application for full approval

#### University of Hertfordshire: Master of Optometry

27. The University of Hertfordshire is seeking full approval for its Master of Optometry programme currently under provisional approval status.
28. The programme is a masters which integrates the pre-registration Scheme for Registration into its final year. This allows successful graduates of the programme straight onto the GOC register.
29. The University intend to continue delivering the programme with an annual intake of no more than 50 (+/- 10%) students per cohort.
30. The most recent GOC approval visit was undertaken by an EVP on 1-2 April 2019.

### Analysis

31. Below is a summary of the visit outcomes for the aforementioned programmes and the recommendations for Council.

Educational establishment	Programme name	Conditions	Visit report
University of Central Lancashire (UCLan)	BSc (Hons) in Ophthalmic Dispensing	<b>Two</b> conditions relating to: <ul style="list-style-type: none"> <li>• documentation provided to applicants and students; and</li> <li>• pre-clinical and clinical facilities.</li> </ul>	Annex one
	MSci Optometry	<b>Seven</b> conditions relating to: <ul style="list-style-type: none"> <li>• the documentation provided to applicants and students;</li> <li>• pre-clinical and clinical facilities;</li> <li>• clinic staffing;</li> <li>• programme staffing;</li> <li>• recruitment of patients for the Eye Health Clinic;</li> <li>• training of supervisors; and</li> </ul>	

Educational establishment	Programme name	Conditions	Visit report
		<ul style="list-style-type: none"> <li>governance of third parties involved in delivering training and professional experience to students.</li> </ul>	
<b>University of Hertfordshire</b>	Therapeutic prescribing for Optometrists	<b>Four</b> conditions relating to: <ul style="list-style-type: none"> <li>the development of teaching materials;</li> <li>module development;</li> <li>appointment of external examiner; and</li> <li>clarification of entry requirements and process.</li> </ul>	Annex three
<p>32. <b>Recommendation:</b> The EVP, Education Committee and the Executive recommend that <b>Council grants provisional approval</b> for the above three programmes.</p>			

Educational establishment	Programme name	Conditions	Visit report
<b>University of Huddersfield</b>	BSc (Hons) Optometry	<b>Six</b> conditions relating to: <ul style="list-style-type: none"> <li>appropriate and fit-for-purpose facilities and equipment;</li> <li>appropriate staffing;</li> <li>sufficient support staff;</li> <li>sufficient external examiners;</li> <li>placement contracts and governance; and</li> <li>assessment regulations.</li> </ul>	Annex two
<p>33. The EVP and Executive recommend that Council grants provisional approval for the above programme.</p> <p>34. The Education Committee recommend that Council <u>does not</u> grant provisional approval based on concerns around staffing, student quality and student cap.</p> <p>35. It is therefore <b>recommended that Council make the decision on whether provisional approval should be granted to this programme</b> with a start date of September 2019.</p>			

36. The EVPs considered that, based on the evidence reviewed prior to and during the visit, six requirements had not been met and they put in place relevant conditions to address these areas.

37. Unmet requirements included staffing levels (two FTEs at present, supported with staff from other disciplines and four by March 2020) but after considering the evidence provided, the Panel were satisfied that the programme was ready to be granted provisional approval.

38. The visit report and recommendation to grant approval was presented to the Education Committee to consider their recommendation. The Committee expressed the following concerns:
- staffing number
  - student cap number
  - potential student quality due to recruitment by clearing.
39. More detail is included within annex five however the summary is below:
40. The Committee discussed student caps, stating that they would have more confidence if the student cap was lowered. The Executive explained that student caps are formulated through discussion (with the provider and the EVP) and are based on clear rationale. This discussion had already taken place; the maximum for the first cohort had already been reduced from the University's initial application to the EVP's recommended 30.
41. In the Committee, it was explained that the Executive and the EVPs are satisfied with the programme and provided the following commentary:
- staff from other departments would be teaching parts of the programme in the first year, which would enable a staff:student ratio of 1:15;
  - interviews for a further member of staff (0.4 FTE) were being held this month, with an intention of a commencement date before the start of the programme;
  - the University was very confident about the clinic being completed on time, but other space was available if needed. A further visit to review progress with the clinic was scheduled for September; and
  - the programme was led by a highly experienced Optometrist and, given the overall approach, the level of preparation already made and the robust plans in place, there was a high degree of assurance and confidence in the University's ability to meet its requirements within a reasonable timescale.
42. The Chair considered the views of the Committee and, having explored ways to mitigate their concerns, the Chair summarised that the Committee was unable to agree on further mitigation and therefore that provisional approval would not be recommended and that the Executive should encourage the university to delay for a year. The Committee agreed to recommend to Council that provisional approval not be granted at this time.
43. When Council consider this application, the Optometry handbook should be applied. Please note:
- the programme must be considered holistically in the context of all requirements and relevant factors;
  - there are no GOC requirements about student entry levels;

- any judgement should be made against the handbook, not other providers; and
- there are a range of robust processes in place to deal with issues that arise with approved programmes.

44. It is therefore **recommended that Council make the decision on whether provisional approval should be granted to this programme** with a start date of September 2019.

Educational establishment	Programme name	Conditions	Visit report
University of Hertfordshire	Master of Optometry	Number of conditions: <b>none</b>	Annex four
45. Based on the recommendations of the EVP and the Executive, <b>the Education committee recommends to Council that the following be granted full approval:</b>			

### Impact assessment

46. The following implications have been identified:
- GOC's reserves – none;
  - GOC budget – planned visits within Education budget;
  - Legislation – none;
  - Resources – none;
  - Equality, Diversity and Inclusion – none;
  - Human Rights Act – none;
  - Sustainability – none;
  - Devolved nations – the GOC carries out its approval and quality assurance function in relation to education providers throughout the UK.

### Communications

47. The outcomes of all approval and quality assurance reviews are communicated to training providers within a reasonable period and visit reports are published on the GOC website following sign off.

### Attachments

**Annex one** – GOC Visit reports: UCLan, March 2019

**Annex two** – GOC Visit report: University of Huddersfield, May 2019

**Annex three** – GOC Visit report: University of Hertfordshire (Therapeutic Prescribing), May 2019

**Annex four** – GOC Visit report: University of Hertfordshire (Optometry), April 2019

**Annex five** – Education Committee notes on University of Huddersfield application June 2019 – strictly confidential – for information only.

(NOTE: none of the annexes are published. Council can [view them here](#)).