Fair Access to the Professions: response to the Call for Evidence from the General Optical Council

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The General Optical Council (GOC) welcomes the opportunity to contribute to the Panel’s work on Fair Access to the Professions. We believe that it is in patients’ interests to ensure that entry to the health care professions is fair and open to people from all social backgrounds.

Part I: Background details and facts

The GOC is the regulator for optometrists and dispensing opticians (including students) and optical businesses in the UK. All optometrists must register with the GOC in order to practise; for dispensing opticians, registration is voluntary unless they are working with children or the partially sighted, although they must be registered if they are using one of the protected titles.

The Opticians Act established the following criminal offences:

- Testing of sight while unregistered (section 24)
- Fitting of contact lenses while unregistered (section 25)
- Sales of optical appliances (eg spectacles or contact lenses) which do not meet the requirements set out in the Opticians Act and/or the Sale of Optical Appliances Order of Council (section 27)
- Use of a protected title while unregistered (section 28). Protected titles are (registered) optometrist, (registered) dispensing optician, (registered) ophthalmic optician and (registered) optician.

The GOC has four core functions:

- Setting standards for optical education and training, performance and conduct
- Approving qualifications leading to registration
- Maintaining a register of individuals who are qualified and fit to practise, train or carry on business as optometrists and dispensing opticians
- Investigating and acting where registrants’ fitness to practise, train or carry on business is impaired

The GOC’s mission is to protect the public by promoting high standards of education and conduct amongst opticians.

Our work is built on a foundation of six core values. These values are based on the Better Regulation Commission’s criteria for good regulation – that our work will be proportionate, accountable, consistent, transparent and targeted, and that we will provide overall organisation excellence.
The GOC has a leaflet giving information about careers in optics which we distribute to schools, colleges and careers centres on request. This provides young people with the information they need to decide whether to pursue a career in optics.

- How many employees are there in the profession?

11,094 optometrists; 5,309 registered dispensing opticians

- How many are training to enter the profession at any point in time? How many actual new entrants are there to the profession each year?

We currently have 4,283 student registrants.

- How many employers are there in the profession? What is the average size of each organisation? What types of organisation (e.g. public, private, third sector) are these?

There is a ‘big four’ of optical chains; Specsavers, Dollond & Aitchison (D&A), Boots and Vision Express. Specsavers is by far the largest, while D&A and Boots have recently announced that they are to merge. They face growing competition from Tesco and Asda, as well as from the internet. The big four’s outlets are often franchises. There are also many independent outlets which are often a single shop but may also be small chains.

- What are the expected trends in employment in the profession?

Reasonably stable. A recent study suggested that out of a range of high street retailers, opticians were being the least affected by the current recession. Nonetheless they will not be immune; people who need glasses may not be able to avoid buying them in a recession but a trend away from more expensive designer brands is inevitable. The other threat to high street opticians comes from the internet. If buying glasses online becomes more popular, high street retailers may be hit.

- What are the qualification requirements for the profession? What proportion are graduates?

Before joining the registers, all optometrists and dispensing opticians, including students, are required to have completed, or currently be studying for, a GOC-approved training course. All optometrists are graduates having completed a BSc Hons or Masters in Optometry course before entering their pre-registration practice placement. All dispensing opticians must complete an approved course of at least diploma standard.

Further details are provided in Part III.

- Are there non-graduate routes into the profession?
There are no non-graduate routes for optometrists but for dispensing opticians diploma and foundation degree routes are also available. Further details are provided in Part III.

- **Are there routes for people to enter the profession mid-career from other professions?**

  A fast track progression route is available for qualified dispensing opticians to become optometrists but no direct route is available from other professions.

- **How many people receive scholarships each year, how much are these worth, and how are they allocated?**

  We do not hold this information.

- **How many internship and/or work experience opportunities are available?**

  All students must complete a vocational training period during which they practice under supervision before they can enter become fully registered. There may also be opportunities for work experience prior to this depending on the mode of study chosen.

- **Do you know of any relevant academic or other studies of the profession?**

  No
Part II: Evidence on current issues or barriers to access to the profession(s)

Both optometrists and dispensing opticians are subject to regulatory requirements, including minimum requirements for Continuing Education and Training (CET) to ensure that they remain up to date in core competencies. Whilst optometrists are eligible for Department of Health funding towards the costs of CET (costs of provision and protected time), dispensing opticians do not receive any funding.

The inequities of this position mean that some qualified dispensing opticians opt out of regulation and work in non-professional roles.

There is a direct impact on patient services, as unregistered dispensing staff are not able to work with children or patients with low vision, or to fit contact lenses.

This position also creates barriers to entry to both the dispensing optics and optometry professions. Dispensing assistants may not seek to become qualified and registered dispensing opticians due to the financial disincentives of regulation, thereby closing off routes to specialising as a contact lens optician, or career progression routes into optometry.

These problems are likely to intensify in future as a result of the planned introduction of compulsory revalidation for all health professionals. Revalidation is intended to give patients assurance that optometrists and dispensing opticians remain competent throughout their careers, by demonstrating at regular intervals that they are fit to practise. The GOC is committed to the introduction of an effective, proportionate system for revalidation. However, we are conscious that this will create an additional cost burden for all our registrants. Therefore, it is essential that funding is available for both optometrists and dispensing opticians to meet this burden in order to avoid creating further barriers to entry to the optical professions.
Part III: Current initiatives, programmes and policies to ensure fair access to the profession(s)

The GOC operates a number of policies and initiatives to assist access to the professions of optometry and dispensing optics. These are detailed below:

**Optometry**

**Competency-based curriculum**

The curriculum for UK undergraduate training in optometry is competency-based which enables effective and impartial assessment, and promotes access through compatibility with recognised national and international competency frameworks, including allowing easier comparison with European curricula and compatibility with the principles of the Bologna Agreement.

**Standard route to registration**

To qualify as an optometrist in the UK you must:

1. Complete an undergraduate degree in optometry at one of the eight GOC-approved universities.
2. Graduate with at least a 2:2 honours degree.
3. Achieve the Stage 1 competencies required for entry to the pre-registration period. The pre-registration period is carried out under supervision of an optometrist member of the College of Optometrists, or a supervisor approved by the University of Manchester.
   If you have not achieved one or more of these criteria, you must successfully complete the GOC’s optometry progression scheme (see below) before you may enter the pre-registration period.
4. Successfully complete a pre-registration period of training under supervision. This includes work-based assessment and a final assessment on the Stage 2 core competencies for optometry.

Candidates can study for an undergraduate optometry degree from one of eight GOC-approved institutions in the UK: Anglia Ruskin University, Aston University, the University of Bradford, Cardiff University, City University, Glasgow Caledonian University, the University of Manchester and the University of Ulster.

Length of course: usually four years in total (Scotland 5 years). A full-time three-year (in Scotland four-year) degree course followed by one year’s salaried pre-registration training with a practice under the guidance of a GOC registered optometrist. This includes a series of assessments throughout the placement, which are set by the College of Optometrists.

Entry requirements: you will normally need 5 GCSEs (or equivalent) at grade C or above, one of which should be in English. You will normally be required to have 3 A Level passes/ approx.
320 UCAS tariff points from the following subjects: Physics, Biology, Chemistry or Mathematics.

Cost: The cost of the training is set by each training institution in accordance with student tuition fees.

**Optometry progression scheme**

In order to access the vocational training period leading to full registration, students must normally achieve a 2:2 degree classification or certificate of clinical competence. An additional route has been developed for those students who fail to achieve this standard. This is known as the Optometry progression scheme, which came into effect in September 2008.

The scheme is open to any optometry student who graduated from a UK university from 2003 onwards but did not achieve the required standard for automatic progression, or whose certificate of clinical competence has expired. The scheme involves the student re-sitting the third year of an optometry degree programme, including any course work and assessments. Students must achieve the pass mark required for 2:2 classification in order to successfully complete the scheme.

Only one attempt is permitted in the progression scheme and performance in the progression scheme will not alter the classification of the optometry degree initially awarded to the candidate.

The scheme ensures that those who need additional time and/or support to reach the required standard have the opportunity to progress with their professional training.

**Scheme for registration**

Until 2005, students were required to pass a 10-part examination to demonstrate that they had the knowledge and skills to become a registered professional. Following the introduction of the GOC core competencies, significant changes have been made to the vocational or pre-registration training and assessment scheme. The new Scheme for registration, run by the College of Optometrists, provides a structured and supported route from student to trainee to professional. Regular assessments take place throughout the supervised practice placement, enabling problems to be identified and better support for the student. The scheme retains a final assessment under examination conditions, but this is now in the form of an Objective Structured Clinical Examination (OSCE).

**Dispensing optics**

**Routes to registration and modes of learning**

A variety of routes are available to become a dispensing optician in the UK from honours degree level to diplomas. Modes of learning including full time, part time, distance learning and day release. Available programmes include:
a) A two-year full time training course at a GOC-approved training institution followed by one year's salaried work in a practice under the supervision of a qualified and GOC-registered optician.

b) A three-year day release training course with a GOC-approved training institution, combined with suitable employment working as a trainee under the supervision of a qualified and GOC-registered optician.

c) A three-year distance learning course offered by a GOC-approved training institution, combined with suitable employment working as a trainee under the supervision of a qualified and GOC-registered optician.

The courses currently approved include:

- BSc Hons in Ophthalmic Dispensing (available as full time or part time study)
- BSc Hons in Optical Management (available as full time or part time study)
- Foundation Degree in Ophthalmic Dispensing (available as full time, part time, day release or distance/ blended learning courses)
- Diploma in Ophthalmic Dispensing (available as full time, part time, day release or distance learning courses).

In the UK you can study at six GOC-approved training establishments: Association of British Dispensing Opticians (ABDO), Anglia Ruskin University, Bradford College, City and Islington College, City University and Glasgow Caledonian University. All routes are assessed by final ABDO examinations. On successful completion of training candidates must register with the GOC in order to practise in the UK.

Entry requirements: you will normally need to have 5 GCSEs (or equivalent) at grades C or above, including English, Maths and Science. For mature students, and overseas/ alternative/ vocational courses, requirements will vary and may be more flexible.

**Career progression**

**Career progression course for DOs**

For qualified dispensing opticians, the University of Bradford offers a career progression course enabling students to graduate with a degree in optometry in approximately 12 months.

The course combines study with work based learning and provides a career progression opportunity for existing dispensing opticians wanting to develop to become optometrists without studying on a further three year full time degree programme. The programme is designed to enable individuals with the knowledge and experience gained from working in practice to apply it alongside the didactic and clinical elements of the programme.
Optometry – specialty training courses

Registered optometrists who have been practising for more than two years can undertake specialist training to gain qualifications to further develop their career. There are three specialist qualifications for optometrists; Additional Supply, Supplementary Prescribing and Independent Prescribing. These specialties are open to optometrists only.

Registrants with the Additional Supply specialty are qualified to write orders for, and supply in an emergency, a range of drugs in addition to those which can be ordered or supplied by a normal optometrist.

Registrants with the Supplementary Prescribing specialty are qualified to manage a patient’s clinical condition and prescribe medicines according to a clinical management plan set up in conjunction with an Independent Prescriber, such as a GP or ophthalmologist or qualified optometrist.

Qualified Independent Prescribers will take responsibility for the clinical assessment of a patient, establish a diagnosis and determine the clinical management required, including prescribing where necessary.

The competencies for each specialty are delivered in various formats. Trainees must:

- Pass taught theory modules
- Undertake a clinical placement under supervision of a designated ophthalmologist - optometrists must demonstrate necessary clinical skills before beginning this placement
- Maintain a portfolio of practice evidence for submission at the end of the course
- Maintain a portfolio of practice evidence to be assessed by the College of Optometrists.

The following courses are available in therapeutic specialties:

- The Institute of Optometry runs an approved training course in Supplementary Prescribing.
- Glasgow Caledonian University runs an approved training course in Supplementary (additional supply) Prescribing.
- City University runs approved training course in Additional and Supplementary Supply Therapeutics.

The following institutions currently offer courses in Independent Prescribing:

- City University, London
- Glasgow Caledonian University, Scotland
- Distance Learning programme at both Aston University, Birmingham and University of Manchester

After optometrists have completed the additional training and qualified in the specialty area, they can be entered on the relevant therapeutic specialty register.
Dispensing - Specialty training courses

Dispensing opticians are able to further progress their career by specialising as contact lens opticians. The contact lens specialty is open to dispensing opticians only. Optometrists are trained and competent to fit contact lenses on first registration, so do not need to register a contact lens specialty to fit contact lenses.

Dispensing opticians with the Contact Lens specialty are qualified to assess whether contact lenses meet the needs of a patient. They can fit and supply a patient with one or more contact lenses and provide aftercare.

Training for the contact lens specialty is built around nine competencies. These include assessing a patient’s needs and delivering aftercare.

The competencies for the contact lens specialty are delivered in various formats. Trainees must:

- Pass taught theory modules
- Undertake practice-based learning under supervision

The approved training course for the contact lens specialty is currently offered by two training institutions; ABDO College and City and Islington College.

After Dispensing Opticians have completed the additional training and qualified in the specialty area, they can be entered on the contact lens specialty register.
Part IV: Suggested actions to extend fair access to the profession(s)

Please see our response under Part II above. We believe it is critical for Department of Health funding to meet the costs of Continuing Education and Training to be extended to dispensing opticians.

Funding must also be made available to both optometrists and dispensing opticians to meet the costs of revalidation, once this becomes a statutory requirement.

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