

Outline Impact Assessment

The GOC's consultation policy requires us to carry out impact assessments alongside our consultations. Assessing impact is an iterative process. As such this is a live document, which will continue to be developed during and after our consultation to update our education and training requirements for GOC approved qualifications.

Purpose of the impact assessment: This impact assessment considers proposals stemming from the Education Strategic Review, specifically proposals to update our requirements for GOC approved qualifications (our Quality Assurance Handbooks for optometry (2015) and dispensing opticians (2011)) with the following:

- Outcomes for Registration
- Standards for Approved Qualifications
- Quality Assurance and Enhancement Method

We seek the views of stakeholders on our current assessment, which we will continue to review and update as we receive sector feedback during and after consultation.

Name of the project deliverables being assessed:	<ul style="list-style-type: none"> • Standards for Approved Qualifications • Outcomes for Registration • Quality Assurance and Enhancement Method
Assessor:	
Version number	0.5
Date IA started:	10 October 2018
Date IA completed:	In progress
Date of next IA review:	Before key project milestones/ Oct 2020
Approver:	Director of Education
Date approved:	Current draft approved – 16 th July 2020

Q1. About the policy or project

Aim: The aim of the ESR is to ensure that the standards of optical education are fit for purpose as the sector continues to evolve and to provide a robust approach to approval and quality assurance of new qualifications.

Purpose and Outcome:

The proposed '**Outcomes for Registration,**' '**Standards for Approved Qualifications**' and '**Quality Assurance and Enhancement Method**' together will ensure the qualifications we approve are responsive to a rapidly changing landscape in the commissioning of eye-care services in each of the devolved nations. They respond 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 student community and their future employers. The drafting of the three documents has been responsive to both feedback from

the previous consultation on ESR concepts and principles and subsequent stakeholder feedback and led by two Expert Advisory Groups (EAGs).

Together, these documents will replace our Quality Assurance Handbooks for optometry (2015) and dispensing opticians (2011) and mitigate the risk that our current requirements (contained within our Quality Assurance Handbooks) become out of date.

The key themes which emerged from the ESR Concepts and Principles consultation published in 2017-2018 were that:

1. student practitioners need earlier, more varied and regular experience with patients;
2. we should put more focus on evaluating the outcomes of the education providers than detailed numerical inputs, such as how programmes should be delivered;
3. newly qualified professionals need to be able to make clinical decisions confidently and safely in the context of changing service needs;
4. newly qualified professionals need to be equipped to deliver new, different and innovative services,
5. we need to have a consistent, fair and proportionate approach to our regulatory processes for approving and quality assuring education that leads to registration with us.

The aim of the proposed 'Standards for Approved Qualifications' is to give education providers more flexibility and greater a responsiveness to stakeholder context when designing qualifications to meet the proposed 'Outcomes for Registration.' In particular, in designing qualifications that integrate periods of clinical and professional experience, provide increased multi-and inter-disciplinary learning and a requirement for broad engagement with a range of stakeholders, including patients and service-users, in the qualification's design and delivery.

The Standards for Approved Qualifications are divided into five categories:

1. Public and Patient Safety
2. Admission of Students
3. Assessment of Outcomes and Curriculum Design
4. Management, Monitoring and Review of Approved Qualifications
5. Leadership, Resources and Capacity

Each category is supported by criteria which must be met for a qualification to be approved.

The proposed 'Outcomes for Registration' contain the following categories:

1. Person Centred Care
2. Communication
3. Lifelong Learning
4. Ethics and Standards
5. Risk
6. Clinical Practice
7. Leadership and Management

Each category also references the GOC's Standards for Practice, which students will be expected to meet once they join the register.

Who will benefit? Patients, their carers, students, prospective students, employers, current and new providers.

Q2. Gathering the evidence, stakeholder involvement and consultation

Available evidence used to scope and identify impact of the policy or project:

Research and consultation:

- Call for evidence (report June 2017)
- Research to learn from other professions/overseas (Nov 2017)
- System leaders' roundtable (Nov 2017)
- Consultation on concepts/principles (report April 2018)
- Research with newly qualified/employers (June 2018)
- Development of standards/learning outcomes with Committees, Expert Advisory Group other external stakeholder groups (summer 2018)
- Education Provider Forum (October 2018)
- Consultation on draft Education Standards and Learning Outcomes (November 2018-February 2019).
- Education Visitor Panel and Advisory Panel feedback (Jan-June 2020)
- Expert review and input from the Quality Assurance Agency (April-June 2020)
- Roundtable on funding (March 2020)
- Expert Advisory Groups developmental activity and feedback (November 2019 – July 2020).

Q3. Activities or areas of risk or impact of the policy or project

Standards for Approved Qualifications

Standard	Identification of potential impacts; evidence gaps; and mitigating actions
<p>1. Public and Patient Safety</p> <p>Approved qualifications must be delivered in a context which assures public and patient safety.</p>	<p>There is no change in the requirement that providers must have policies and systems in place to ensure students understand and adhere to the GOC's Standards, and the requirements around GOC registration for students. This will have no/minimal resource impact for education providers.</p> <p>Education providers already have processes in place to investigate and manage student fitness to train matters. The new draft criteria signposts the reader to additional guidance (the GOC acceptable criteria) to support providers to make the decision as to whether to report the matter to the GOC, which should have a positive impact on public safety and reduce regulatory burden, by ensuring that the right matters are referred and that low-level issues dealt with more appropriately at a local level are not.</p> <p>There is no change in the concept of academic staff, preceptors, supervisors etc. ensuring that students do not put others at risk. The new draft criteria includes those who employ the students as well, which will have a positive impact on public safety and will require the single point of accountability (SPA) to have appropriate controls and mechanisms in place for any practice-based learning.</p>
<p>2. Admission of Students</p> <p>Recruitment, selection and admission of students must be transparent, fair and appropriate for admission to a programme leading to registration as an optometrist or dispensing optician.</p>	<p>By setting a requirement for English language for overseas applicants to approved qualifications, there is a potential negative impact on overseas students whose first language is not English. However, this impact is outweighed by the public interest in that the proposed English- language requirement for overseas students will improve overseas students' confidence and ability to progress, with communication skills necessary to meet the outcomes. IELTS Level 7 (with no individual score lower than 6.5) is consistent with other regulators' requirements. Equivalent alternatives to IELTS are permitted, which should minimise any additional financial implication for overseas students who are required to demonstrate their English language skills.</p> <p>There should be a positive impact on equality with the addition of criteria around fair and transparent recruitment, selection and admissions, and information provided to applicants, which are more robust than our current Handbooks.</p>

Standard	Identification of potential impacts; evidence gaps; and mitigating actions
	<p>There should be no adverse impact arising from the Recognition of Prior Learning criteria, which replaces the GOC RPL policy. This criterion can have a positive impact on equality, particularly for students who have taken a career break (for example maternity, carer responsibilities, personal health needs) and have undertaken other forms of education.</p>
<p>3. Assessment of Outcomes and Curriculum Design</p> <p>The approved qualification must be supported by an integrated curriculum and assessment strategy that ensures students who are awarded the approved qualification meet all the outcomes at the required level (Miller's triangle; knows, knows how, show how & does).</p>	<p>This standard will have a positive impact for education providers – allowing for greater innovation in qualification design and assessment approach, whilst ensuring that the critical elements for maintaining quality remain. This standard incorporates what was previously described as the Common Assessment Framework –describing expectations for a robust assessment strategy, approach to assessment design, standard setting and progression arrangements to ensure standards are maintained (or raised).</p> <p>The requirement to use feedback from a broad range of stakeholders, including patients, is more explicit than previously and should have a positive impact on quality as well as patient care.</p> <p>The new requirement that approved qualifications must be listed on one of the national qualification frameworks (as listed in the criteria) will have a positive impact on quality of education and regulation, as well as public confidence. This new criteria will have no impact on current providers, except for the College of Optometrists whose approved qualification is not currently listed on a qualifications framework.</p> <p>The criteria ensuring variety of learning experience, environments, methods etc. remain broadly the same although it is more flexible than set out in the current Handbooks. This should have a positive impact on the students' learning and increase education providers' opportunity to innovate.</p> <p>One of the few numerical requirements remaining in new criteria specifies that at least 1600 hours/ 48 weeks of patient-facing professional and clinical experience must be integrated within the approved qualification in one or more periods of time. The requirement for at least 1600 hours/ 48 weeks of patient-facing professional and clinical experience is included to safeguard against potentially significant variations in the</p>

Standard	Identification of potential impacts; evidence gaps; and mitigating actions
	<p>volume of clinical and professional experience across providers, given the detailed numerical requirements for safe patient episodes within the current handbooks are not being retained.</p> <p>This will be tested in the consultation and we particularly welcome feedback from education providers, students and employers regarding whether a numerical requirement for patient-facing professional and clinical experience within the qualification is required and if so, whether the figures specified are reasonable and would be effective in adequately preparing the student to meet the outcomes at the required level (Miller's pyramid).</p> <p>Financial impact of integrated periods of professional and clinical experience</p> <p>The financial impact of the integration of patient-facing professional and clinical experience within the approved qualification was considered at our funding Roundtable held on 13th March 2020 and discussed further in our subsequent report 'Further and Higher Education Funding for Optometrists and Dispensing Opticians' published in May 2020.</p> <p>That report described the funding landscape for undergraduate optometry and dispensing optician programmes and GOC approved qualifications and began to map potential sources of additional, increased or reallocated funding to support SPA's implementation of the new, integrated qualifications. Drawing on examples from other healthcare disciplines including pharmacy, the paper illustrates the volume and sources of current Higher Education Funding available to providers of approved qualifications in their design of integrated qualifications in each of the devolved nations.</p> <p>For most optometry students entering the College's Scheme for Registration, the Scheme's fees are paid upfront and in full, although for some students, employers will pay this fee on their behalf. If, as a consequence of our proposals, integrated periods of professional and clinical experience sit within an academic award the upfront financial impact to students and employers will be positive, as students may be eligible for student tuition fee support/loans (and student support/ loans for living costs) in each of the devolved nations. However, if as a result of integrating periods of professional and clinical experience within the approved qualification courses are longer, students'</p>

Standard	Identification of potential impacts; evidence gaps; and mitigating actions
	<p>accrued debt will be larger, a negative financial impact. This impact may be mitigated if salaries received by student during periods of professional and clinical experience are broadly commensurate with current pre-registration salaries. In England, this impact may be further mitigated by price competition between providers, if providers choose to set fees below the current fee- cap.</p> <p>The financial impact of assuming responsibility for the quality assurance of placements for providers and employers may be positive if integrated periods of professional and clinical experience within the approved qualification retains eligibility for GOS funding (or equivalent), apart from in hospital settings, which do not benefit from GOS funding (or equivalent.)</p> <p>There may be additional benefits from improvements in the quality of integrated periods of professional and clinical experience for students and employers because of the SPA's enhanced quality controls to support teaching and assessment within the professional and clinical experience. There may be a positive impact if the optical sector can marshal additional support for experiential learning from national bodies responsible for healthcare workforce education (HEIW, HEE, NES & Dept of the Economy, NI), as illustrated in our paper, 'Further and Higher Education Funding for Optometrists and Dispensing Opticians.'</p> <p>Current providers of GOC-approved qualifications within the UK will each have a different cost base, net inflow and resource allocation model, teaching, research and assessment load, and are therefore better-placed than the GOC to assess whether the proposal to integrate professional and clinical experience within the approved qualification will have a positive or negative financial impact. We would therefore welcome provider's views on the financial impact of this aspect of our proposals.</p> <p>Equality & Diversity Impacts</p> <p>The inclusion of a new criterion regarding use of equality, diversity and inclusion data to inform curriculum design, delivery and assessment of the approved qualification and to enhance student's experience of studying is likely to have a positive impact on students. Data collection is likely to result in no additional financial cost to the university, although resulting action from the data may have a financial impact.</p>

Standard	Identification of potential impacts; evidence gaps; and mitigating actions
<p>4. Management, Monitoring and Review of Approved Qualifications</p> <p>Approved qualifications must be managed, monitored, reviewed and evaluated in a systematic and developmental way, through transparent processes which show who is responsible for what at each stage.</p>	<p>The concept of a Single Point of Accountability (SPA) is introduced within this standard. The positive impacts include:</p> <ul style="list-style-type: none"> • Regulation – having one single point of accountability simplifies and strengthens our regulatory processes and function which, ultimately, improves public protection. A named person(s) would ensure clarity and consistency with GOC communication and we believe that this would have no adverse impact. • Legal – a new requirement is for providers of approved qualifications (the SPA) to be legally incorporated and to have appropriate contracts between constituent bodies (if any). Contracts will need to clearly set out responsibilities between organisations, a new requirement which will improve public safety, and provide clarity for students and those providing experiential and multi-and inter-disciplinary learning opportunities. There may be a financial cost to SPAs in drawing up any contracts required, although education institutions could consider collaborating on the design of standard templates to share/reduce costs. Such contracts are also likely to exist in other disciplines. Becoming legally incorporated would have no financial impact on current education institutions, who all are already legally incorporated, unless they decide to combine in a joint venture. • Students – there would be a positive impact for students and prospective students. One organisation (the SPA) will be responsible for admittance of students to the approved qualification, for student’s progression, the measurement (assessment) of student’s achievement of the outcomes; enhancing opportunity for progression and the accountability of the provider of the approved qualification. • Education providers may choose to organise themselves in different ways to meet the criteria for a Single Point of Accountability (SPA), which may or may not require additional financial investment. We would welcome feedback from current or prospective education providers regarding the potential impact they foresee. • Training and support of supervisors is not a new criterion and is unlikely to result in additional cost. Supervision provides an opportunity for SPAs to promote cultural change in the sector, enhancing lifelong learning and reflective practice, and to develop the role of supervision in practice – and the probability that

Standard	Identification of potential impacts; evidence gaps; and mitigating actions
	<p>excellent supervision will positively impact on optical education and cultural change.</p> <ul style="list-style-type: none"> The notification of reportable events/changes process has been strengthened to include any relevant regulatory body reviews, which will have a positive impact on regulation and no adverse impact for SPAs.
<p>5. Leadership, Resources and Capacity</p> <p>Leadership, resources and capacity must be sufficient to ensure the outcomes are delivered and assessed to meet these standards in an academic, professional and clinical context.</p>	<p>The criteria will have a positive impact on SPAs. SPAs will have increased flexibility in deciding what resources they require to teach and assess their qualifications, which will support quality of provision and minimise financial impacts. Our evidence-based approach supports our regulatory aims by considering leadership, capacity and resources in context. It is a significant improvement upon our current prescriptive approach and the barriers to innovation that this presents for our current providers.</p> <p>We are aware of challenges in finding and retaining suitably experienced academic staff to lead the development of approved qualifications, expertise that is critical to a qualification's success. We consider that our proposals provide a valuable opportunity for the sector to develop and invest in succession and development plans.</p>

Outcomes for Registration

Outcome	Identification of potential impacts; evidence gaps; and mitigating actions
Structure	<p>For dispensing opticians, the proposal is to replace the list of competencies specified in the current handbook with the 'Outcomes for Registration,' which describe the expected knowledge, skills and behaviours a dispensing optician must have at the point they qualify and register with the GOC.</p> <p>For optometry, the proposal is to replace the list of stage one and stage two competencies specified in the current handbook with the 'Outcomes for Registration,' which describe the expected knowledge, skills and behaviours an optometrist must have at the point they qualify and register with the GOC.</p> <p>Although the 'Outcomes for Registration,' are the same for both professions, reference to the GOCs Standards for Practice at the start of each category contextualises each outcome within the differing responsibilities and scope of practice for each profession. This will be further supported by the co-production of an indicative guidance document,</p>

Outcome	Identification of potential impacts; evidence gaps; and mitigating actions
	<p>which will provide a greater level of detail to support providers as they develop new qualifications or adapt existing approved qualifications to meet the outcomes for each profession. This increased flexibility could mitigate the impact of any changes in technology or changing scopes of practice, enabling providers to adapt their provision accordingly.</p> <p>The outcomes are now linked to a well-established competence framework called ‘Miller’s Pyramid of Clinical Competence’, which our education providers are familiar with. Allocating Miller’s Pyramid level to each outcome (knows, knows how, shows how and does) will maintain consistency in student’s achievement of the outcomes and inform the choice and design of assessment items, thereby mitigating any impact of changing from the handbooks’ current lists of core competencies to the outcomes.</p>
Content	<p>The drafting of outcomes has been informed by feedback from a range of sources and led by the two Expert Advisory Groups. We consider the outcomes will promote public protection and equality, diversity and inclusion. We also consider the new focus on professionalism, lifelong learning, patient care, management of risk and enhanced communication skills may bring a positive impact on future service-user and patient care.</p> <p>Financial Impact of the proposed ‘Outcomes for Registration’</p> <p>Current providers and future SPAs may organise themselves differently, with regard to resource allocation and cost base, which makes comparisons between providers and between current providers and future SPAs difficult. In addition, the funding of higher and further education in each of the devolved nations is different, as described in our report ‘Further and Higher Education Funding for Optometrists and Dispensing Opticians.’</p> <p>We consider there will be additional investment required by providers/ future SPAs to design their new integrated qualifications (informed by broad stakeholder engagement), re-write their curriculum and develop new contractual agreements with placement providers. This impact may be mitigated by new integrated qualifications which may offer a greater variety of career options and thereby be more attractive to prospective</p>

Outcome	Identification of potential impacts; evidence gaps; and mitigating actions
	<p>students, offer greater economies of scale and possibly cost-effective to run in the medium term than existing approved qualifications.</p> <p>The impact of Covid-19 will continue to exacerbate the financial impact on providers, with reduced income at institutional level and volatility in student recruitment, alongside managing enhanced blended learning and campus-based social distancing. By allowing for a phased transition, providers will be able to choose whether to go early and look for economies of scale in reviewing their provision in light of Covid-19 at the same time, or to transition at a later stage.</p> <p>We ask that relevant stakeholders provide feedback to enable us to understand the financial implications the introduction of the proposed 'Outcomes for Registration' and their implementation will have on future SPAs.</p>

Quality Assurance and Enhancement Method

Quality Assurance and Enhancement Method	Identification of potential impacts; evidence gaps; and mitigating actions
Content	<p>The focus on quality assurance and enhancement provides an opportunity to foster innovation, enhance the quality and responsiveness of provision to meet the needs of patients, members of the public and service users, as well as share good practice. We believe that this approach will enable the sector to develop innovative teaching and assessment methods whilst surpassing our minimum expectations as set out in the 'Outcomes for Registration' and 'Standards for Approved qualifications.' This could have a positive impact on widening participation, meeting the same standards but doing so in different ways.</p>
Implementation	<p>Financial Impact</p> <p>For providers of current GOC-approved qualifications/ SPAs based overseas, we are proposing to charge on a full cost-recovery basis. This will have a negative impact on current GOC-approved qualifications based overseas. For providers of current GOC-approved qualifications/ SPAs based in the UK there will be no charge for applying for</p>

Quality Assurance and Enhancement Method	Identification of potential impacts; evidence gaps; and mitigating actions
	<p>qualification approval. This will have a positive impact on current GOC-approved qualifications based in the UK.</p> <p>Current providers of GOC-approved qualifications within the UK will be better-placed than the GOC to assess if their costs in engaging with our proposed 'Quality Assurance and Enhancement Method' will be greater than the current cost of engaging with our existing Approval and Quality Assurance (A&QA) method. The proposed 'Quality Assurance and Enhancement Method' will take a risk-based approach to assessing whether a qualification meets the proposed outcomes and standards, relying on evidence provided by the SPA in annual, thematic and sample-based reviews to inform the frequency and nature of a SPA's periodic review.</p> <p>This risk-based approach may have a positive impact by ensuring that qualifications which are well-designed and therefore have a low risk profile are subject to review no more than necessary, whereas higher risk provision has a greater degree of oversight mitigating the potential for and costs of course failure.</p> <p>The proposed method also proposes a risk-based staged approach to the consideration of applications for new qualification approval which will help limit the financial exposure of SPAs in the early stages of qualification design, before they begin to recruit students. Central to the first three stages is the SPA's development of the business case, identifying and securing the investment necessary to ensure the qualification's success.</p> <p>Capacity</p> <p>There will be a transition period during which SPAs will develop and seek approval for new or adapted qualifications whilst they migrate or 'teach out' legacy qualifications. This will have a negative impact on provider's capacity (exacerbated due to the current pandemic) due to the additional management time and investment of resource required to design and seek approval for (or adapt) qualifications to meet the proposed outcomes and standards. If one or more existing providers decide to exit the market, a potential negative impact will be a reduction in the number of qualifications we approve,</p>

Quality Assurance and Enhancement Method	Identification of potential impacts; evidence gaps; and mitigating actions
	<p>consequential, serious impact on future workforce supply and geographical distribution of courses.</p> <p>A possible positive impact is the potential attractiveness of new, innovative integrated qualifications to a larger, more diverse pool of new prospective students to both professions.</p> <p>We have proposed the creation a knowledge hub/ information exchange to help providers/ future SPAs to work together and support the development of new, integrated qualifications. We are also proposing a phased introduction to allow providers to migrate at a point that is most appropriate for them.</p>

Step 3: Monitoring and review

Q5. What monitoring mechanisms are or will be in place to assess the actual impact of the policy?

Longitudinal Research

We believe that it is extremely important to measure the impact of our changes on the competence, confidence and capacity of future registrants. We are planning to commission a longitudinal research project to provide the empirical data required to adjust our outcomes and standards and measure the effectiveness of the new qualifications we approve.

Impact Measurement

We will also measure the impact of our proposed changes through:

- Implementation timescales and data;
- Repeat consultations and surveys: newly qualified and employers; providers; representative and membership bodies;
- Risk reviews as part of our Annual Monitoring process.

Financial Impact

Our funding Roundtable held on 13th March 2020 explored some of these impacts and the resulting sector-led action proposed at the Roundtable is described in our subsequent report 'Further and Higher Education Funding for Optometrists and Dispensing Opticians' published in May 2020. That report described the funding landscape for undergraduate optometry and dispensing optician programmes and GOC approved qualifications and began to map potential sources of additional, increased or reallocated funding to support SPA's implementation of the new, integrated qualifications. Drawing on examples from other healthcare disciplines including pharmacy, the paper illustrates the volume and sources of current Higher Education Funding available to providers of approved qualifications in their design of integrated qualification in each of the devolved nations.

We would welcome providers' views on the financial impact of our proposals, particularly the financial impact of the integration of patient-facing professional and clinical experience within the approved qualification.

Next review date: October 2020

For consultation