

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Optometrist

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

Bachelor in Optometry and Vision Science, [REDACTED] India.

4 years Bachelor in Optometry course.

3 years in college+ 1 year internship in hospital.

Optometrist are qualified to work in Hospitals, Optical retail chains, Private Clinical practice & Corporate industries like [REDACTED]

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Positive

Please explain why.:

It will provide Optometrist exposure & future development opportunities. Also jobs for all eligible candidates who desire to move forward with self development. GOC registration process will be much more smoother, and will allow registrations from all European and Asian countries...expected.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

No

Please provide further detail.:

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

It will provide good exposure and scopes for Optometrist around the world and also fulfill optometrist requirements of GOC.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

The applicant may choose between either of the two routes above

Please explain why.:

It will provide open scope of selections and self assessment will be a good scope. Ex. A fresher Optometrist might select to proceed through pre assessment by a provider and an experienced optometrist might apply directly to GOC

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

Education and right to derired job should be for all irrespective of any differences.

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Positive

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Positive

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

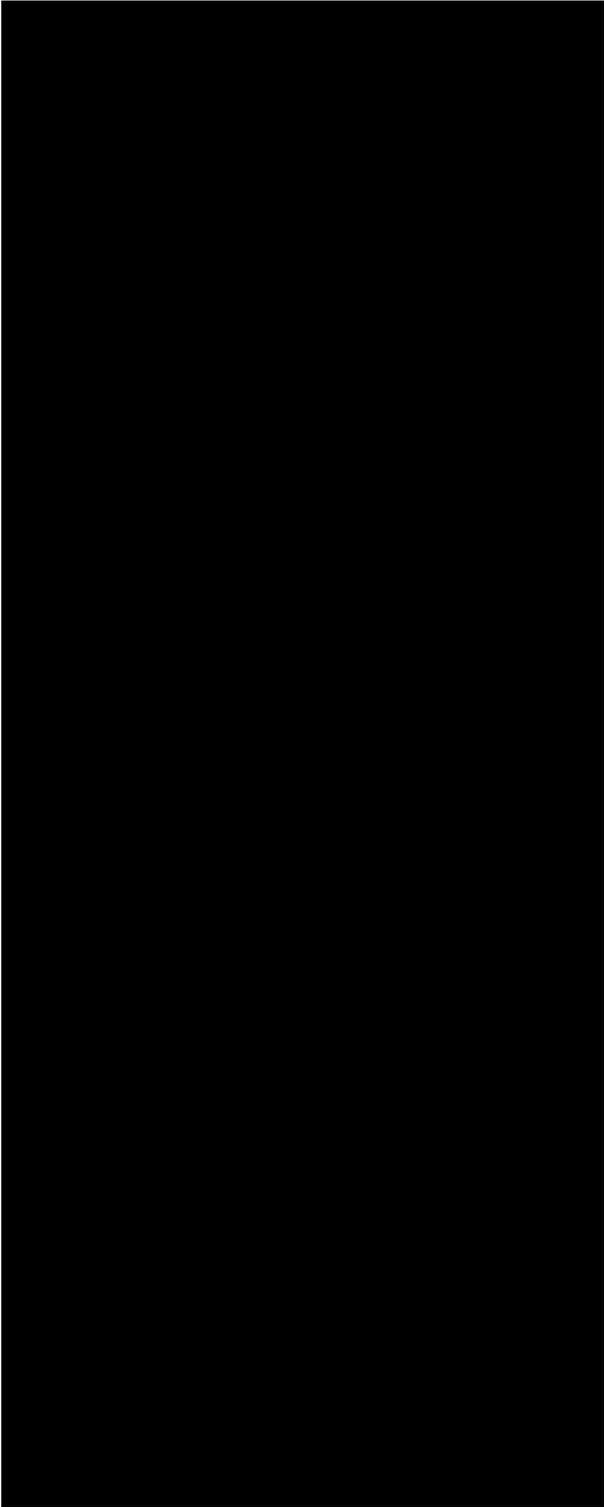
No

Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

Yes

Please provide further detail.:



[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

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4 Which category best describes you or the organisation you are responding on behalf of?

Education provider

If other, please specify:

## Consultation questions

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Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

Those degrees from the USA, Canada, Hong Kong, Australia and New Zealand should be comparable to GOC-approved qualifications in optometry. Those from Spain may also be similar, except for access to some diagnostic drugs, which can easily be remedied by a compulsory CPD course

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Positive

Please explain why.:

This will allow optometrists with a suitable level of qualification from overseas to rapidly register in the UK. This will enhance our ability to attract talent and make the optometry career path more attractive to potential students. There would need to be a rapid GOC process, with pre-mapping of these overseas course outcomes in place to improve efficiency.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Not Answered

Please provide further detail.:

NA

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the

UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

As stated above

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

A dual process will slow the system, so if the select overseas outcomes are already mapped, registration should be a simple process of checking certificates and perhaps a reference in clinical experience post qualification

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

Unlikely if the costs are kept low and there are no additional barriers or delays that can affect income, impacting on those with low income or dependents the most

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

See above

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Positive

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Positive

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

No

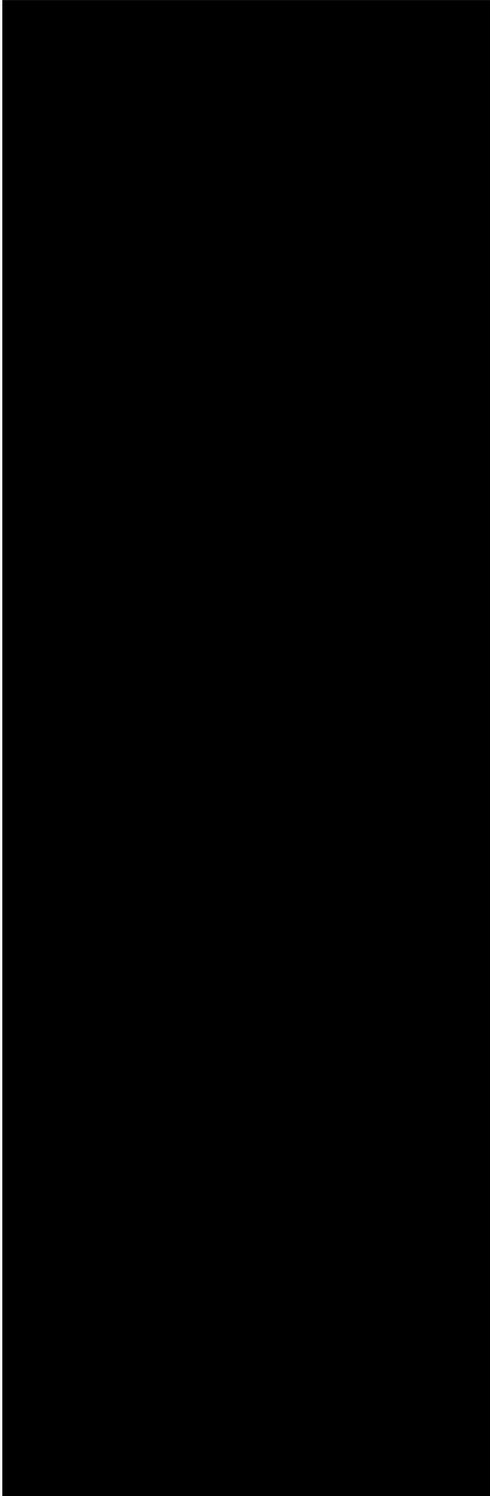
Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

Yes

Please provide further detail.:

This should happen even earlier if possible to reduce the application backlog



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## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

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2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

[REDACTED]

[REDACTED] All N. American optometric education and most state/province laws and practice would be comparable.

[REDACTED]

[REDACTED]

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Neutral

Please explain why.:

I fail to see why any significant number of educational institutions would jump through the hoops to become GOC approved so that their graduates could leave their country/region to practice in the UK. But perhaps I am wrong as most optometric schools have a need to prove that they uphold some international standard which so far is lacking. (I am not sure the GOC wants to or can provide such an international standard.)

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

No

Please provide further detail.:

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Neutral

Please explain why.:

Proposals 1 & 2 can only be implemented if a sufficient number of outside educational institutions are motivated to become GOC approved. Proposal 3 must always be available and may be needed more than is proposed.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

The applicant may choose between either of the two routes above

Please explain why.:

Review of such applications should be done by a limited number of providers be it the GOC or a small number of the UK optometry schools for efficiency.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Age

Please describe the impact on the individuals or groups that you have ticked.:

Allowing only Proposals 1 & 2 might discriminate by age. Allowing Proposal 3 should minimize such discrimination although some (increased) fee would exist.

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Q9 - Patients and the public:

Q9 - Current and prospective providers of approved qualifications:  
Positive

Q9 - Placement providers:

Q9 - Employers:  
Positive

Q9 - Devolved Nations:

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

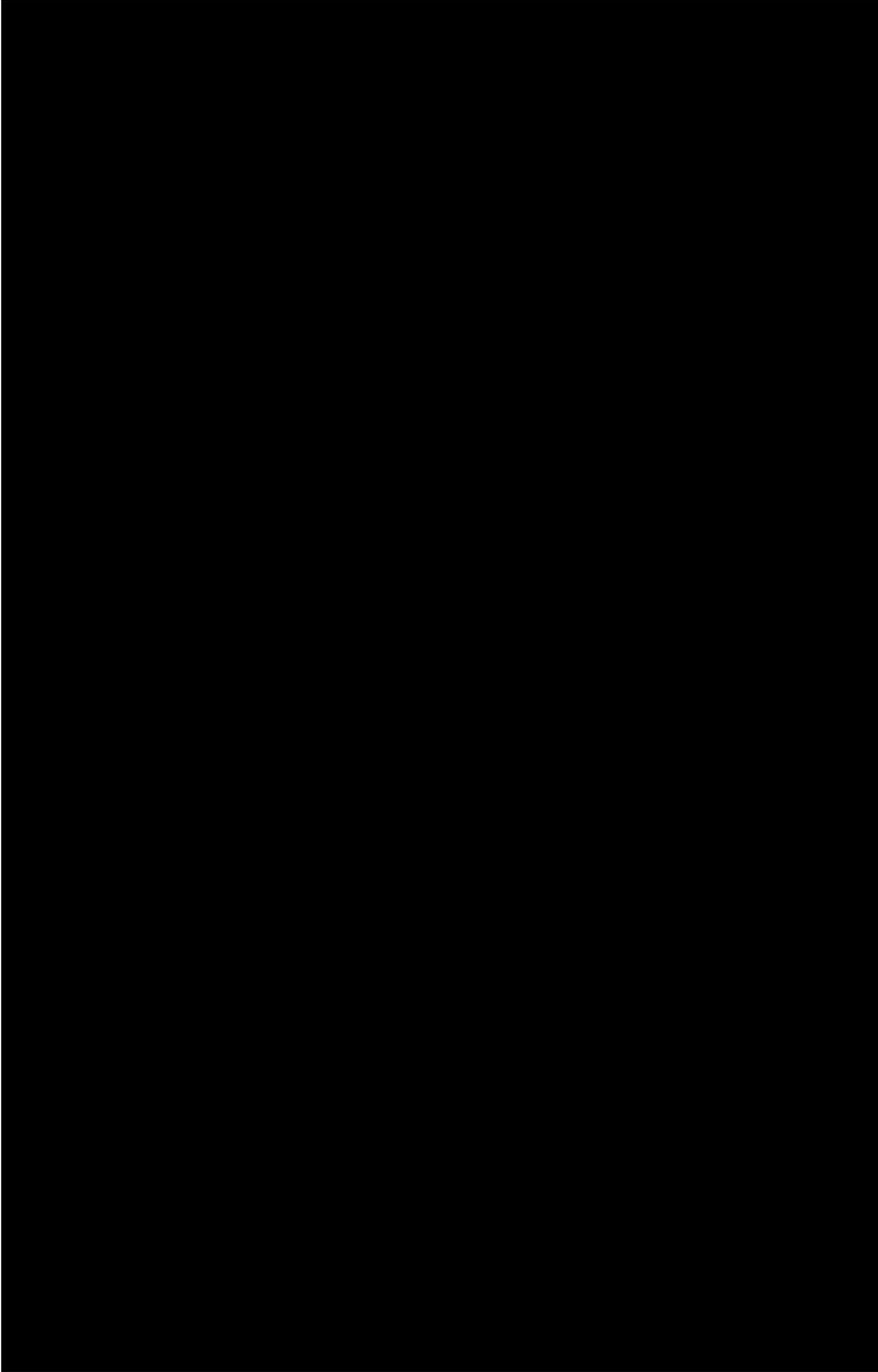
No

Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

Neutral

Please provide further detail.:



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[REDACTED]

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1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

Any Irish, US, Spanish, Singaporean and Norwegian university optometry qualification. I am familiar with the curricula. I have worked with optometrists with qualifications from these countries and they are of a high quality.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Positive

Please explain why.:

Speeds up process with out compromising public safety.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

No

Please provide further detail.:

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

Allows good applicants to join the process when they don't fall into the category related to Proposal 1.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

Maintains quality assurance.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Positive

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Positive

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

Yes

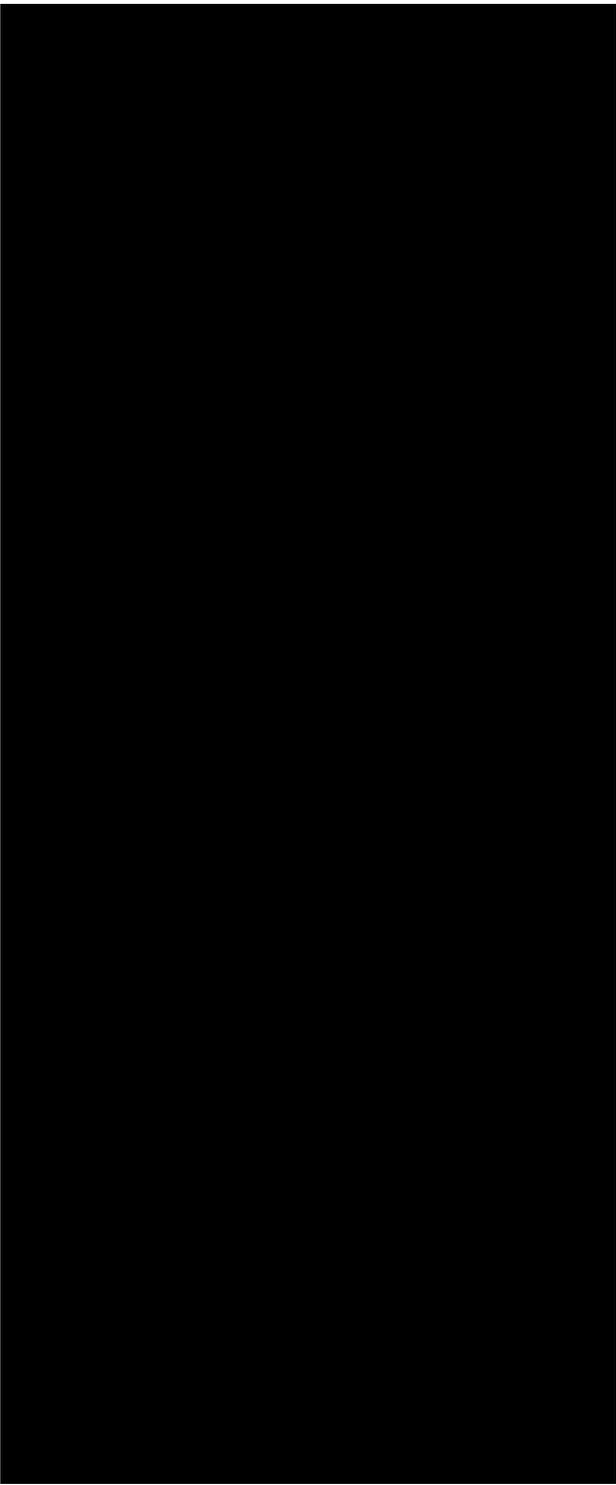
Please provide further detail.:

Impacts on the non-UK GOC Assessors.

12 Is the proposed implementation date realistic (September 2026)?

Yes

Please provide further detail.:



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Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

There should be no "comparable qualification" from outside of the UK, when it comes to assessing a practitioners knowledge and skill if they are to be able to practice in the UK and on the general public.

I think this is a very lazy approach, and I'm appalled that this is being considered when quality and standards should be higher now than ever. There are an abundance of optometry schools and yearly graduates have never been higher. So why this is even being considered is beyond me.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Negative

Please explain why.:

Again assessments should be completed by the GOC, abiding by correct UK standards so that applicants aren't a danger to the public.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Yes

Please provide further detail.:

Process of application should still be in the best interests of the public and shouldn't be made easier.

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the

UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Age, Disability, Marriage and civil partnership

Please describe the impact on the individuals or groups that you have ticked.:

Any one older, or on maternity leave or which may require employers to change working arrangements. Will be replaced or not considered against cheap overseas labour.

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Negative

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Negative

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Negative

Q9 - Other (please specify below):

Negative

Please specify 'other':

Just an excuse for cheap labour, benefiting corporates

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

No

11 Are there other impacts (positive or negative) we should consider?

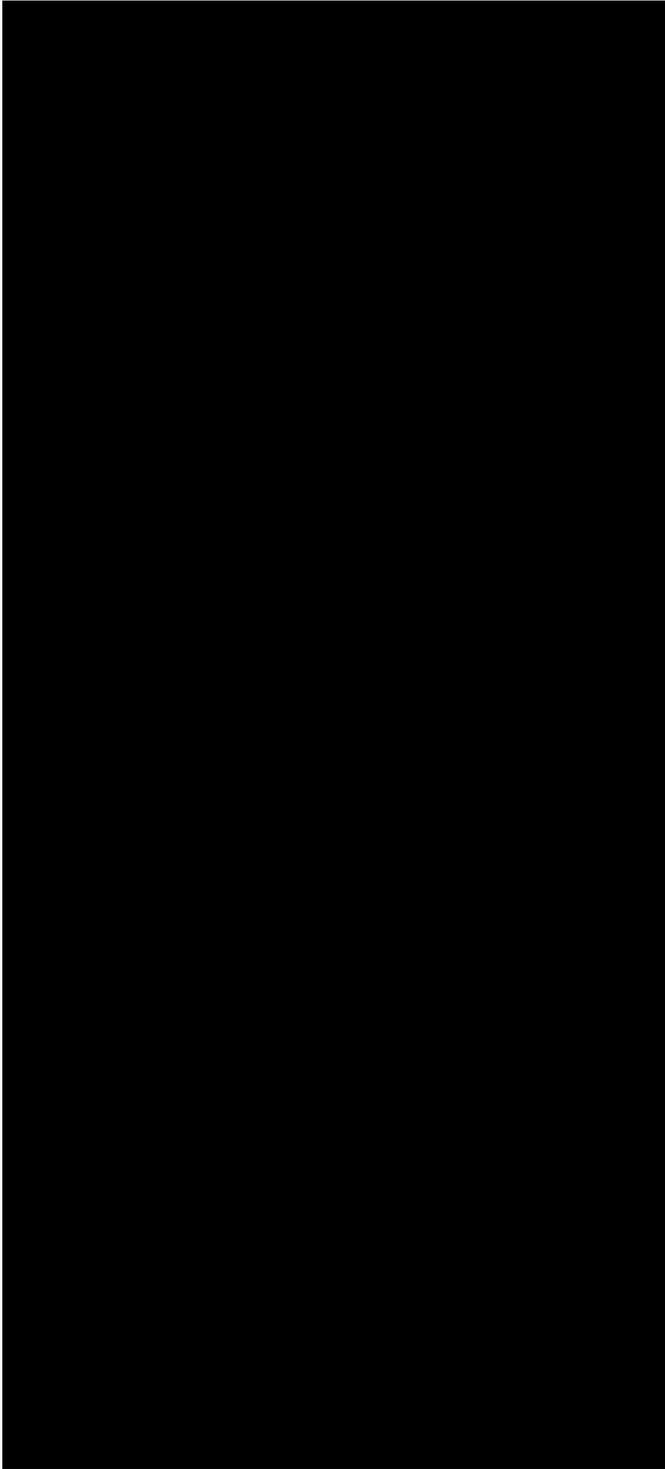
No

Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

No

Please provide further detail.:



[REDACTED]

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[REDACTED]

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If yes, specify name of organisation:

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Education provider

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

No

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

I have had the pleasure of assessing many overseas student optometrists in the completion of their pre reg year which they under the current guidelines they have to do before applying to join the GOC register and I can state truthfully there is no one size fits all. The students vary considerably in ability even with what you would consider similar qualifications and experience so yes there certainly does need to be a further "hoop" to jump through before they are allowed to join the register. It seems onerous however to make them complete a full degree course so I would suggest they are allowed to complete the in practice based assessment as part of their requirements to join the register and that this is overseen by the bodies responsible for the practice based assessment of the ETR.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Positive

Please explain why.:

See above answer .

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Not Answered

Please provide further detail.:

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Neutral

Please explain why.:

It depends what the GOC consider relevant outcomes for registration as each applicant will show different abilities and bring different skill sets with them

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

This would make it equivalent to other schemes in other parts of the world .I would beg to differ in the numbers of students this may apply to -if you think there are only going to be 10 students /year I think you are vastly underestimating the numbers involved.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Positive

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Positive

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

No

11 Are there other impacts (positive or negative) we should consider?

Yes

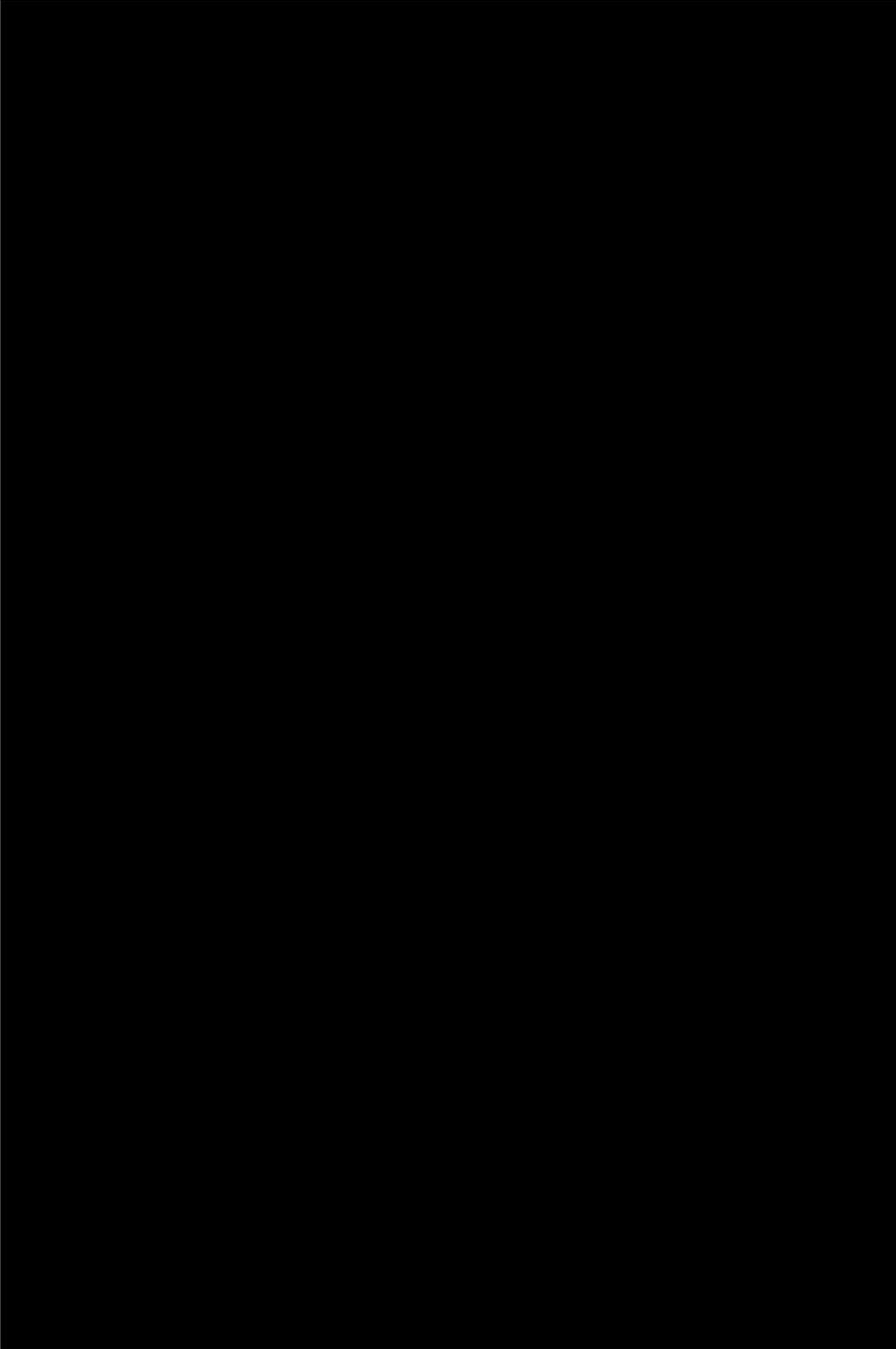
Please provide further detail.:

workforce planning ,assumption of all trainees basic abilities ,safety of the general public ,

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Neutral

Please provide further detail.:



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Optometrist

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No

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

Doctor of Optometry Degree Nigeria.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Positive

Please explain why.:

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

No

Please provide further detail.:

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Neutral

Please explain why.:

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

The applicant may choose between either of the two routes above

Please explain why.:

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Age, Disability, Pregnancy and maternity, Race

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:  
Positive

Q9 - Patients and the public:  
Positive

Q9 - Current and prospective providers of approved qualifications:  
Positive

Q9 - Placement providers:  
Positive

Q9 - Employers:  
Positive

Q9 - Devolved Nations:  
Negative

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

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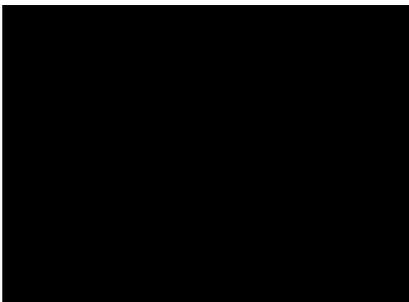
No

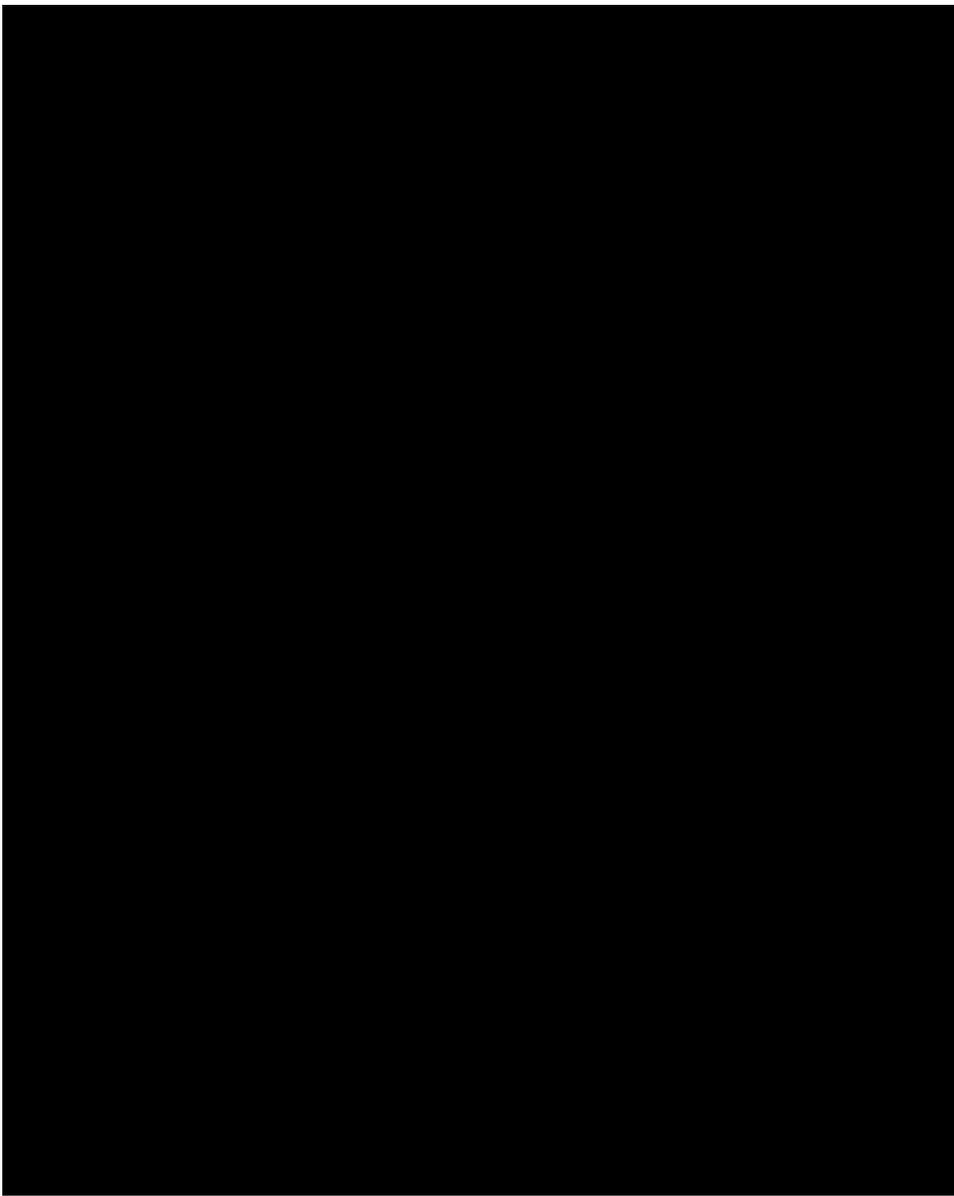
Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

Neutral

Please provide further detail.:





[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Optometrist

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

[REDACTED]

New Zealand optometrists are well qualified and practice full scope Optometry including therapeutic prescribing. NZ optometrists are fully qualified. Guven the special ties the two countries enjoy In my opinion registration should be reciprocal.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Positive

Please explain why.:

Country and university dependent

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Not Answered

Please provide further detail.:

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Positive

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Positive

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

No

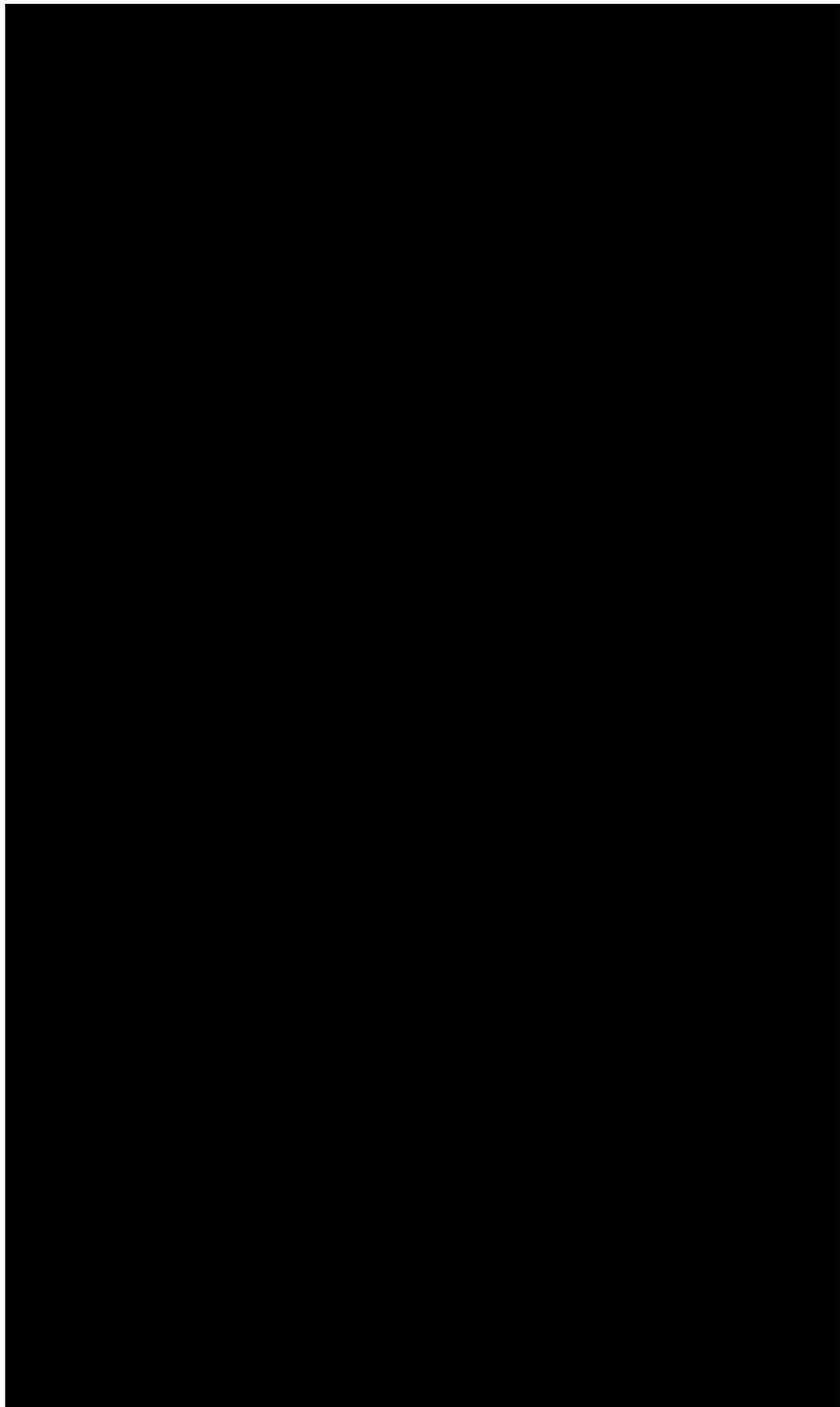
Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

Yes

Please provide further detail.:





Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Dispensing optician

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

Very difficult to answer as the qualifications in other countries are so different

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Negative

Please explain why.:

Linguistics and variation in roles

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Yes

Please provide further detail.:

Qualify for UK Qualifications as we would be expected in other countries

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Negative

Please explain why.:

Doubt they will "Exceed" current GOC Requirements

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Pre-assessed by a provider of the approved qualification only

Please explain why.:

GOC has a tendency to downgrade

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:  
Negative

Q9 - Patients and the public:  
Negative

Q9 - Current and prospective providers of approved qualifications:  
Negative

Q9 - Placement providers:  
Negative

Q9 - Employers:  
Negative

Q9 - Devolved Nations:  
Negative

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

No

11 Are there other impacts (positive or negative) we should consider?

Yes

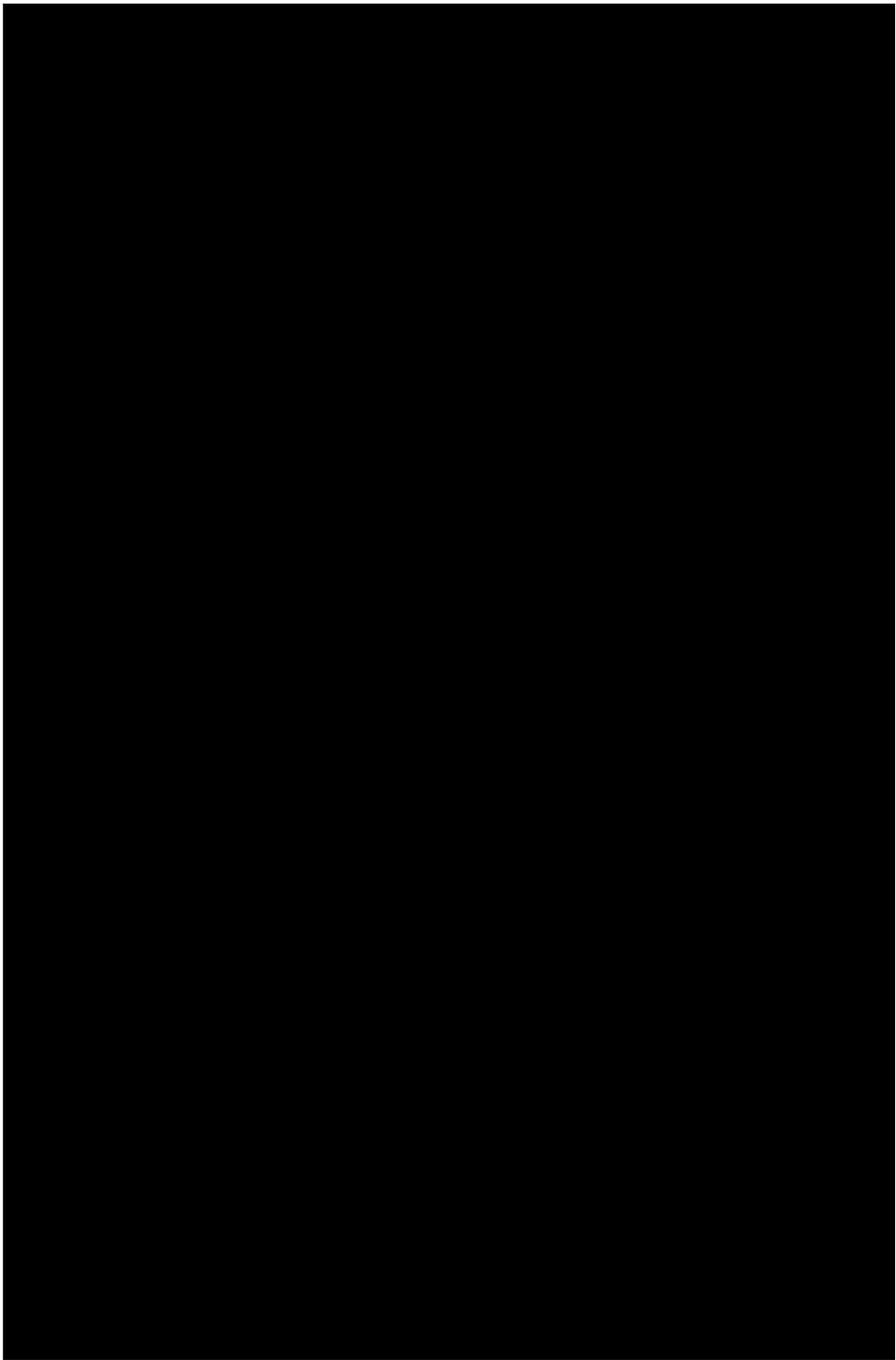
Please provide further detail.:

Impact of those who have qualified under UK Regs. and whose qualification is more stringent than others

12 Is the proposed implementation date realistic (September 2026)?

Neutral

Please provide further detail.:



[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Optometrist

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

The Doctor of Optometry programme: where Optometrists would have done a practice based training within their training year (externship, solo practice) and at the end of their University degree (internship).

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Negative

Please explain why.:

This shuts the door to International qualified Optometrists, As more practices open up in remote areas of the United Kingdom, there could be a shortage of Opticians and Optometrists.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

No

Please provide further detail.:

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Marriage and civil partnership, Sexual Orientation

Please describe the impact on the individuals or groups that you have ticked.:

For someone who has a partner in the UK, it provides the opportunity for the Optometrist/Optician to practice their profession while residing in the UK.

Sexual orientation: Some professionals may not be able to express their orientation in their home country and even face retribution. Seeking refuge abroad and still being able to contribute to the profession is a win for equality.

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Positive

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Positive

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

No

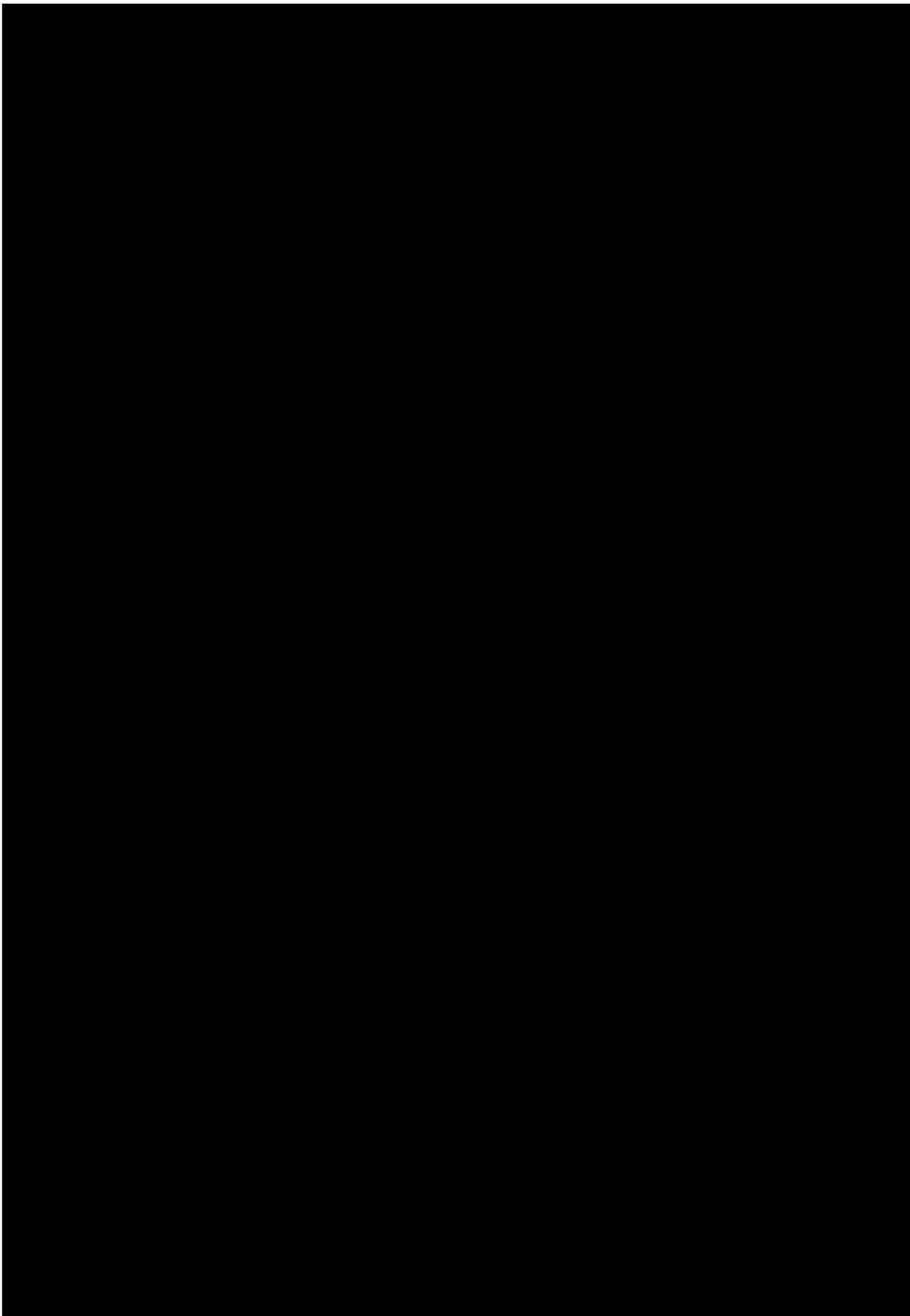
Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

Yes

Please provide further detail.:





Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Optometrist

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

US, Canadian Australian and New Zealand optometrists appear to be working a a level comparable with or higher than optometrists in the UK.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Negative

Please explain why.:

Proposal 1 suggests that an overseas qualified optometrist will have to complete the full UK qualification, which for many international applicants is excessive. It would be more appropriate for international applicants to complete part of the full UK qualification, but that would require individual registration assessment to identify the areas in which an applicant is lacking

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Yes

Please provide further detail.:

International applicants should complete the College of Optometrists Clinical Learning in practice modules or a UK University's equivalent. Before embarking on this they should be independently assessed to ensure that their level of training and experience is adequate for them to successfully complete this and to ensure that the public is protected by ensuring their clinical skills are adequate. This would be analogous to the current position, where international applicants complete the Scheme for Registration following an independent assessment of their training and experience which identifies any training needed prior to the Scheme for Registration.

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

This should enable applicants from countries such as the US, Canada, New Zealand and Australia to register more readily. These optometrists are usually at least as well qualified as a UK optometrist.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

This would ensure equitable treatment for all applicants

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:  
Negative

Q9 - Patients and the public:  
Negative

Q9 - Current and prospective providers of approved qualifications:  
Negative

Q9 - Placement providers:  
Negative

Q9 - Employers:  
Negative

Q9 - Devolved Nations:  
Negative

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

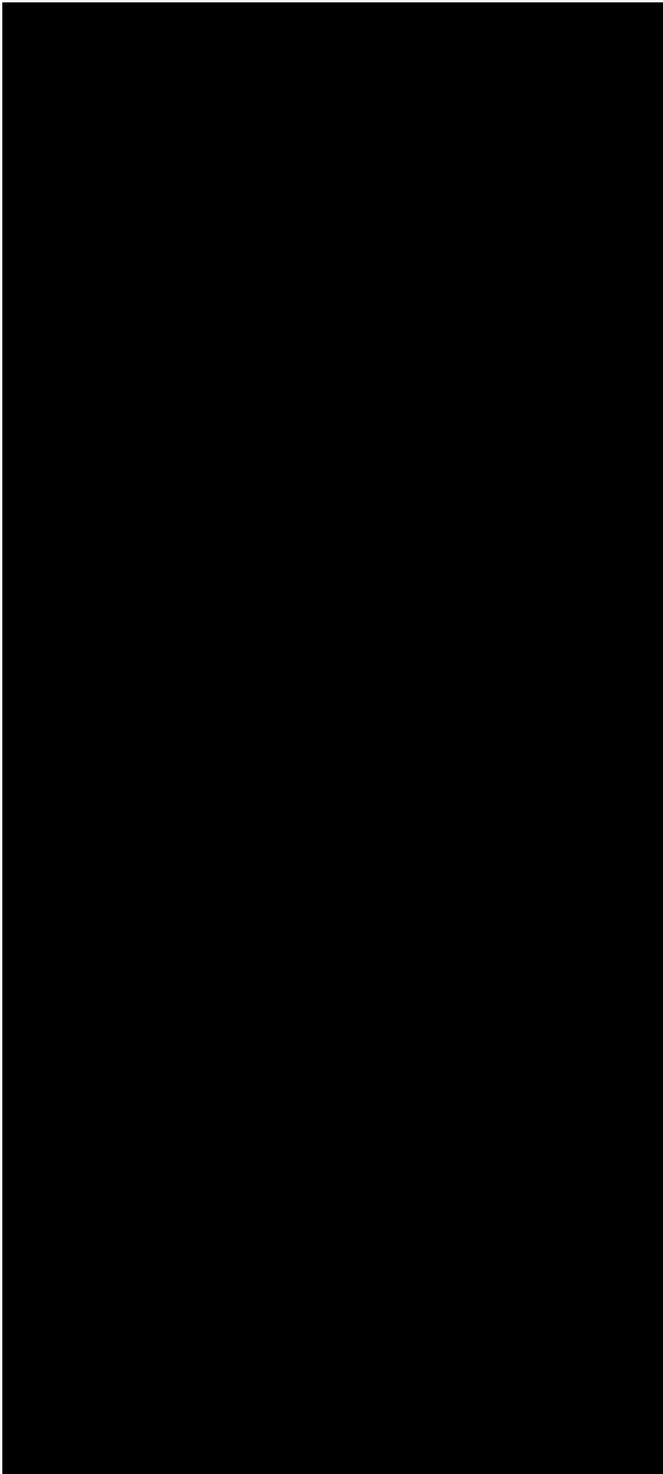
No

Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

Neutral

Please provide further detail.:





I honestly and not quite sure what this means but if you are saying that equally trained or over qualified trained optometrists from outside the UK can not have to take one of those expensive, time consuming or dehumanising exams, then yes I agree. You should make it policy to count an OD degree from Canada or the USA to be acceptable. You allow USA COPE credits to be used as GOC credit for CPD so why would you not accept the degree earned there?

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Yes

Please provide further detail.:

I honestly and not quite sure what this means but if you are saying that equally trained or over qualified trained optometrists from outside the UK can not have to take one of those expensive, time consuming or dehumanising exams, then yes I agree. You should make it policy to count an OD degree from Canada or the USA to be acceptable. You allow USA COPE credits to be used as GOC credit for CPD so why would you not accept the degree earned there?

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

Yes -- why would you NOT want more optometrist from equally trained or from countries where they have trained to a higher degree?

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

Cut out the middle man and make it more affordable for USA optometrists to qualify and work here. It is enough that we leave behind our 6 figure starting salary to come to this country and practice on a lower therapeutic level starting out. Give us a break and make it more straightforward with less people to pay to look at papers and check boxes. The only optometrist from the USA who have moved here is because of family not because the job satisfaction or salary of an optometrist here is better.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Q9 - Patients and the public:

Q9 - Current and prospective providers of approved qualifications:

Q9 - Placement providers:

Q9 - Employers:

Q9 - Devolved Nations:

Q9 - Other (please specify below):

Please specify 'other':

Again, I am not fully sure of what your "approach" is after reading your paper online so can not fully answer this question.

But you would make a lot of USA optometrist like myself happy.

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

Yes

Please provide further detail.:

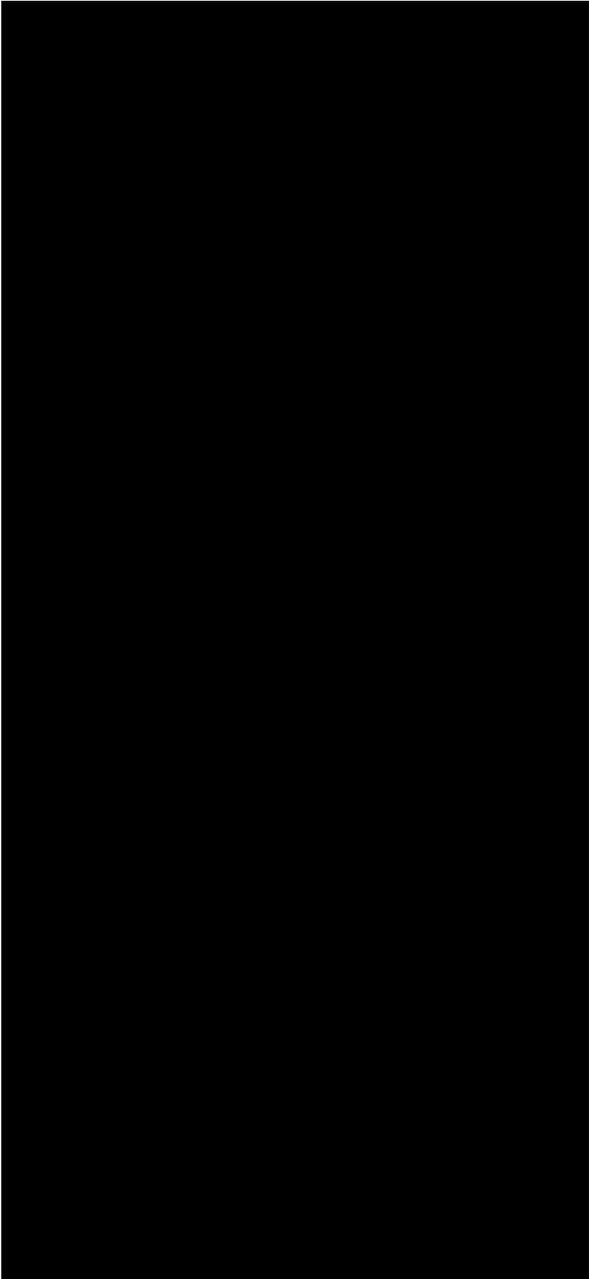
Yes - don't over complicate it. Either accept the level of education the optometrist from outside the UK has or not. And if you don't, make them go to a UK school and get a degree here. That is what we do in the USA. Honestly, I could not real that whole annex one - far too complicated and time consuming.

12 Is the proposed implementation date realistic (September 2026)?

No

Please provide further detail.:

I don't believe you will get everyone to agree on this. There are far too many organisations and corporations who control optometry and optics in this country for things to move even in 10 years time.





[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

[REDACTED]

2 What is your email address?

Email:

[REDACTED]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Education provider

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

Australia & New Zealand - both seem to incorporate a higher level of learning allowing prescribing.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Neutral

Please explain why.:

Will ensure prior learning is fully assessed and experience in UK setting, however many might see this as taking longer or overly burdensome way of entering the register and putting off applications.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

No

Please provide further detail.:

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

There will be changing qualifications abroad and some will have comparable or higher standards of what an Optometrist does in the UK. It seems right that these applicants should not have to undertake undergraduate training again, if there is evidence from the qualification/register abroad about the standard to overseas qualification.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

The applicant may choose between either of the two routes above

Please explain why.:

Flexibility if they are unsure about level of the qualification, and utilises the expertise of HEIs.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:  
Negative

Q9 - Patients and the public:  
Positive

Q9 - Current and prospective providers of approved qualifications:  
Negative

Q9 - Placement providers:  
Negative

Q9 - Employers:  
Negative

Q9 - Devolved Nations:  
Positive

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

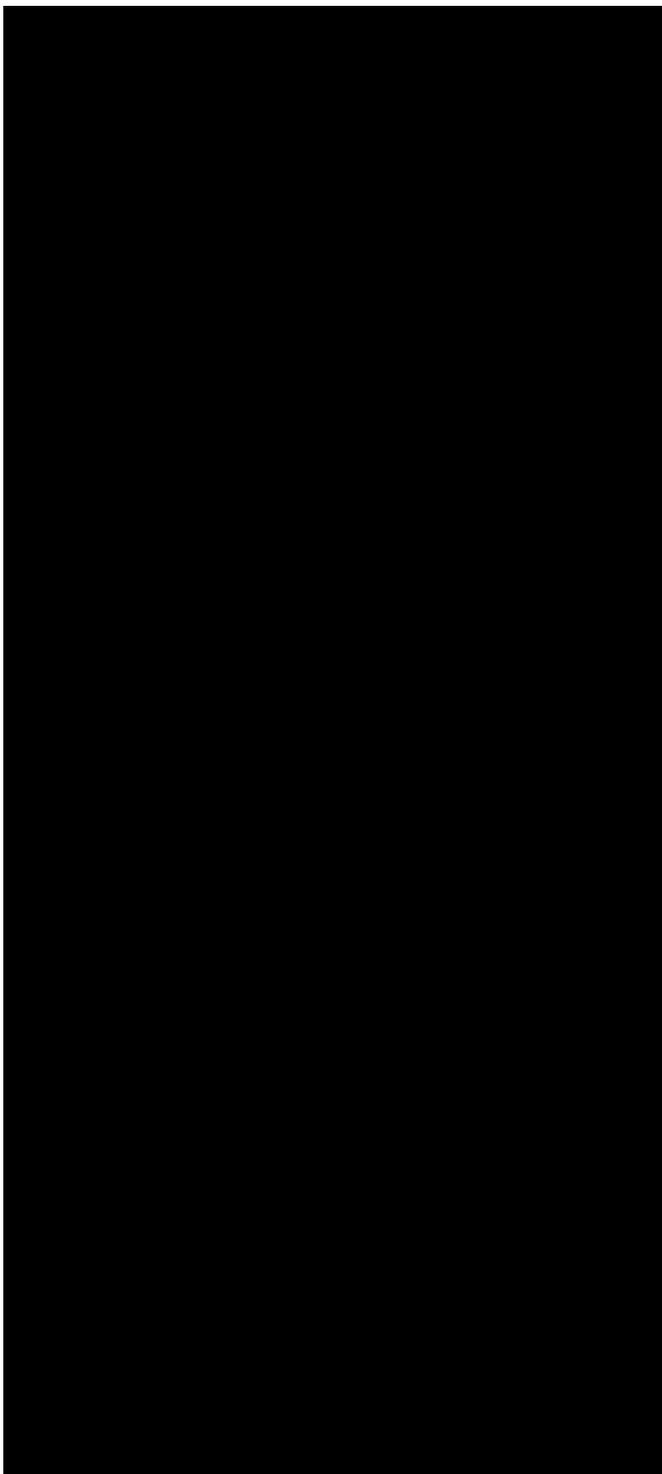
No

Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

Neutral

Please provide further detail.:



[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Optometrist

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

[REDACTED]

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Positive

Please explain why.:

Easier and less admin for both sides.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Not Answered

Please provide further detail.:

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Negative

Please explain why.:

I'm not sure what falls under the little word 'may'. I think probably there needs to be more certainty for those going through this. Because at the end of the day the extra charge, if the 'may' turns out to be 'yes', may be too much for them and they are unable to continue the process. Then it's a waste of everyone's time and effort.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

The applicant may choose between either of the two routes above

Please explain why.:

There may be a low demand from students of a certain provider so they don't participate in 'getting approved', but one person every now and then may be interested and therefore they shouldn't be discriminated against.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Q9 - Employers:

Q9 - Devolved Nations:

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

Yes

Please provide further detail.:

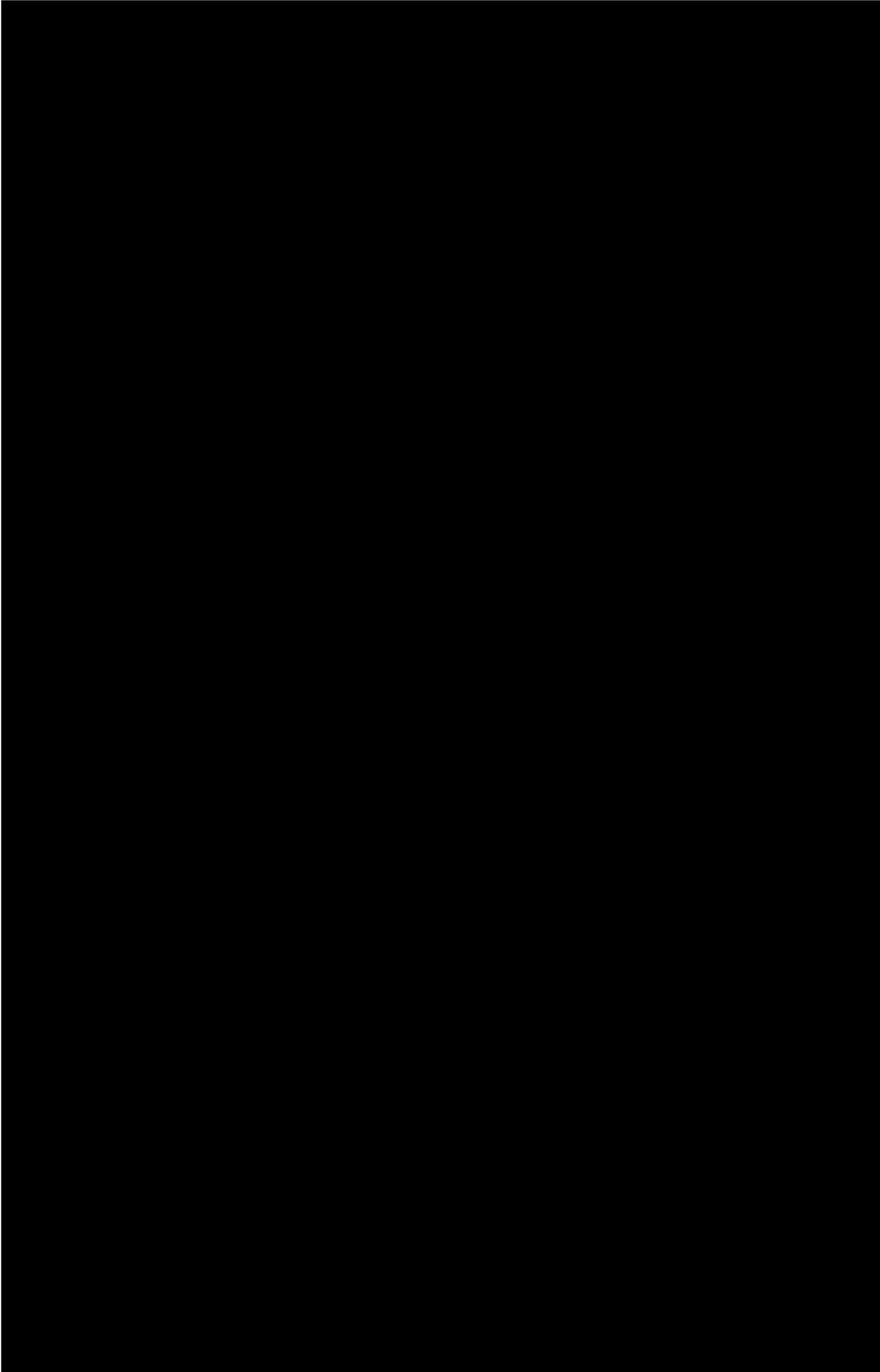
I do wonder what will happen as a result. Is it going to turn into a 'if you accept me, I'll accept you' situation which I think leads to all sorts of non conscious prejudices, discrimination, cliches, etc? At the end of the day there's this enormous list at each university/provider about who they are 'providers' for. If that's going to be the case, the surely the impossible should be done: that every optical education provider around the world sits around the table and everyone makes everything equal.

12 Is the proposed implementation date realistic (September 2026)?

Neutral

Please provide further detail.:

Not sure. Remember that a lot of providers won't start their academic year/registration year in September. And therefore they will be preparing their syllabi at different points in the year. I just don't know.



[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Optometrist

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

- OACNZ approved qualifications in Australia and New Zealand (To note: that they have slightly higher competency and all Optoms will have therapeutic training which none of the M.Optom fresh graduates has).
- OD from USA/Canada: they should be able to register. It is a post-graduate course and generally higher competency than UK Optoms, again all will have ocular therapeutics training.
- Many schools/institutions from India and Malaysia have programmes that are highly competent and might need minimum adaptations to work as an Optom in the UK, [REDACTED]

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Negative

Please explain why.:

- If GOC no longer undertake individual assessment for registration, then UK will not receive the international pool of talented and hardworking Optometrists which is severely lacking in the optical industry. I cant see why people in greater number move from Australia or the USA to UK, where the salary of Optoms is 20-40% less than the other countries, even if anyone is happy to move to a cold/wet weather.
- the idea is non-UK provider is great, I cant see if this is practical, unfortunately, which is unlikely to inject a good number of international talent.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Yes

Please provide further detail.:

- To attract a good pool of talented international candidates, GOC need a doable and easy registration process, maintaining minimum registration standard. GOC already has >10 approved optometry education institutes (universities) that provide approved standards of Optometry teaching. Without trying to re-invent the wheel, these universities can assess and support the aspiring international candidates who may need an update on one subject or need 44 weeks of CLIP (Clinical learning in practice, based on new ETR), amended in their training, and eventually graduate with their own undergrads. This way it will be easy for GOC and universities will have support to recruit talented candidates for the optical industry and themselves.

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Neutral

Please explain why.:

- Without fully assessing, how will GOC know that the candidate meets or exceed the requirement? I am not sure if I am missing anything, but GOC will have to continue assessing fresh applications, I don't see dozens of applications coming from Australia or USA-registered Optoms, it is actually lots of UK Optoms who apply for registration with OCANZ in Australia.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Pre-assessed by a provider of the approved qualification only

Please explain why.:

- International candidates being assessed by the UK based approved education providers is the correct approach, which will reduce the load from GOC and will align the candidates' learning experience with the current Optometry students in the UK.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Positive

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Positive

Q9 - Other (please specify below):

Please specify 'other':

Only if current prpvider involved.

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

No

11 Are there other impacts (positive or negative) we should consider?

Not Answered

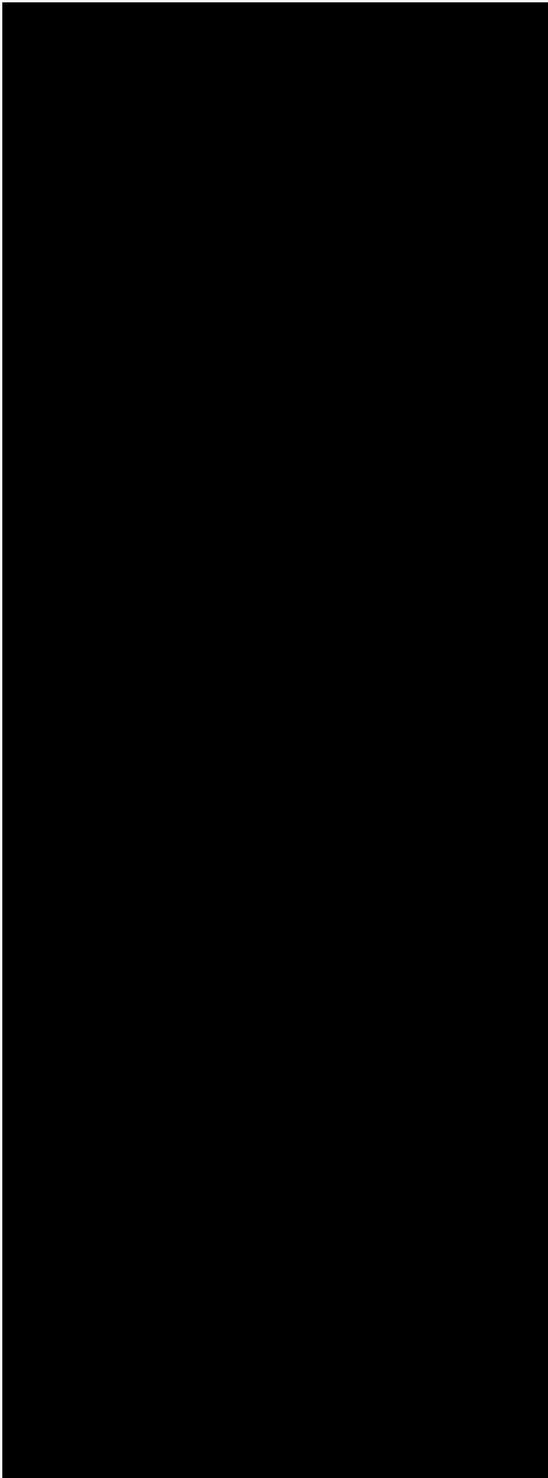
Please provide further detail.:

Not having an individual assessment for international candidates is the wrong way forward, whereas similar approach is available in Australia and New Zealand (set of three exams: one theory and two practical)

12 Is the proposed implementation date realistic (September 2026)?

Yes

Please provide further detail.:



[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Other

If other, please specify:

International registrant

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

[REDACTED]

In my case (I applied under the EU directive) my long work experience in the Ophthalmology sector in Germany was not considered. Even worse: there is no transparency in who the assessors are and why they rejected the theoretical training which they had previously approved (I undertook this in the UK).

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Positive

Please explain why.:

If there is enough evidence of skills and knowledge, there shouldn't be an issue in practicing for as long as the applicant knows the UK legislation.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

No

Please provide further detail.:

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the

UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Neutral

Please explain why.:

It is a duplication of work for the GOC.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Pre-assessed by a provider of the approved qualification only

Please explain why.:

For consistency across applications

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

I think, the way it is now discriminates against

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

I don't think the proposed 1 and 2 do not mean discrimination.

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Positive

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Positive

Q9 - Other (please specify below):

Positive

Please specify 'other':

It will help the UK workforce.

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

No

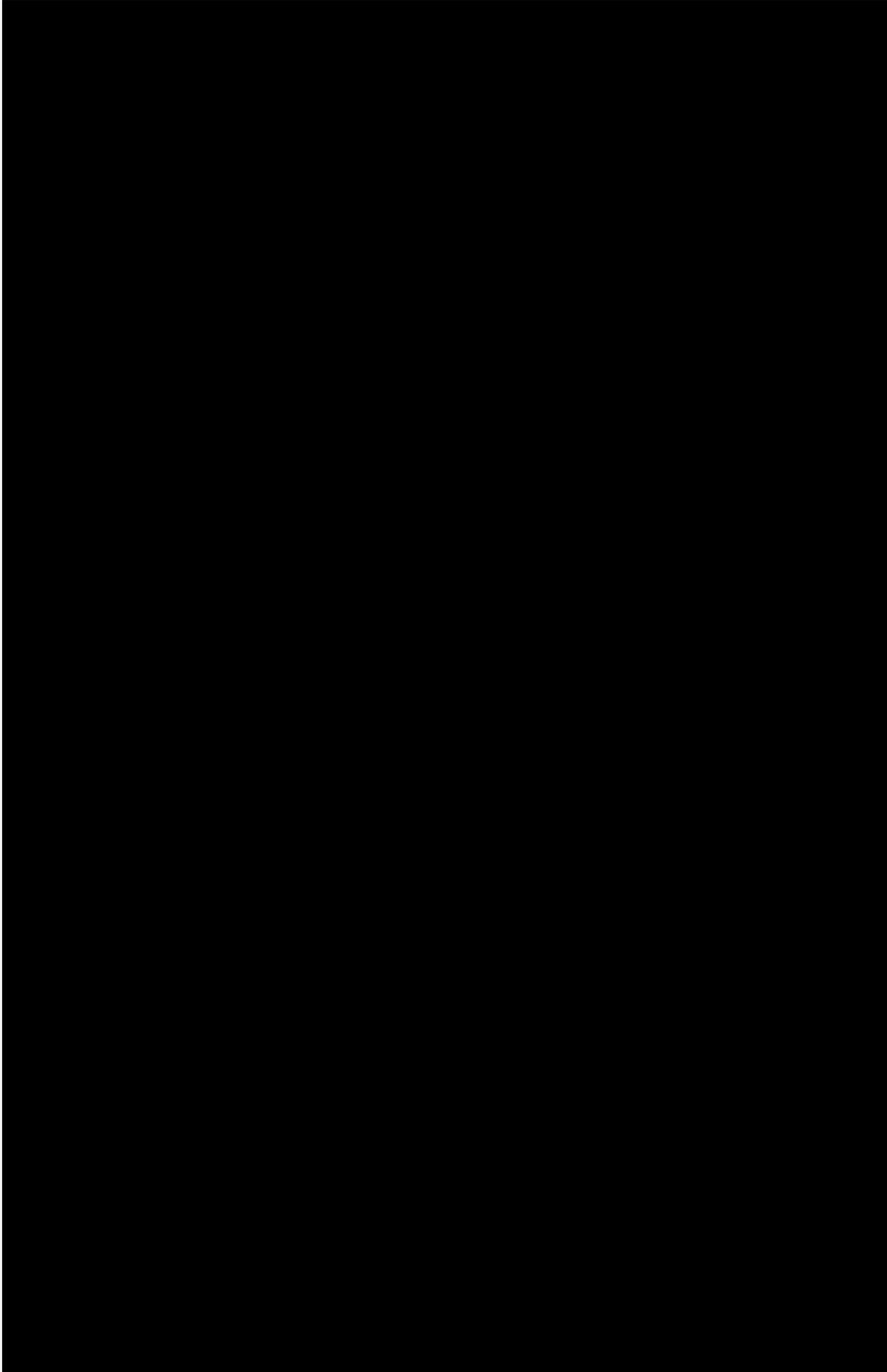
Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

Yes

Please provide further detail.:

It is feasible in that time. It could probably be implemented earlier as the ERT starts 2023 for some universities, and the College might be very busy implementing their scheme for UK students.



[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

[REDACTED]

2 What is your email address?

Email:

[REDACTED]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Optometrist

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

The Doctor of Optometry(OD) program from outside the UK should be comparable to the Bachelor of optometry in the UK.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Positive

Please explain why.:

I believe this would create the opportunity for a standardised exam for applications rather than an interview.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Not Answered

Please provide further detail.:

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Negative

Please explain why.:

A standardised exam should replace the interview. That will eliminate human bias.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Pre-assessed by a provider of the approved qualification only

Please explain why.:

This ensures one standard applies to every applicant.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Positive

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Positive

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

Not Answered

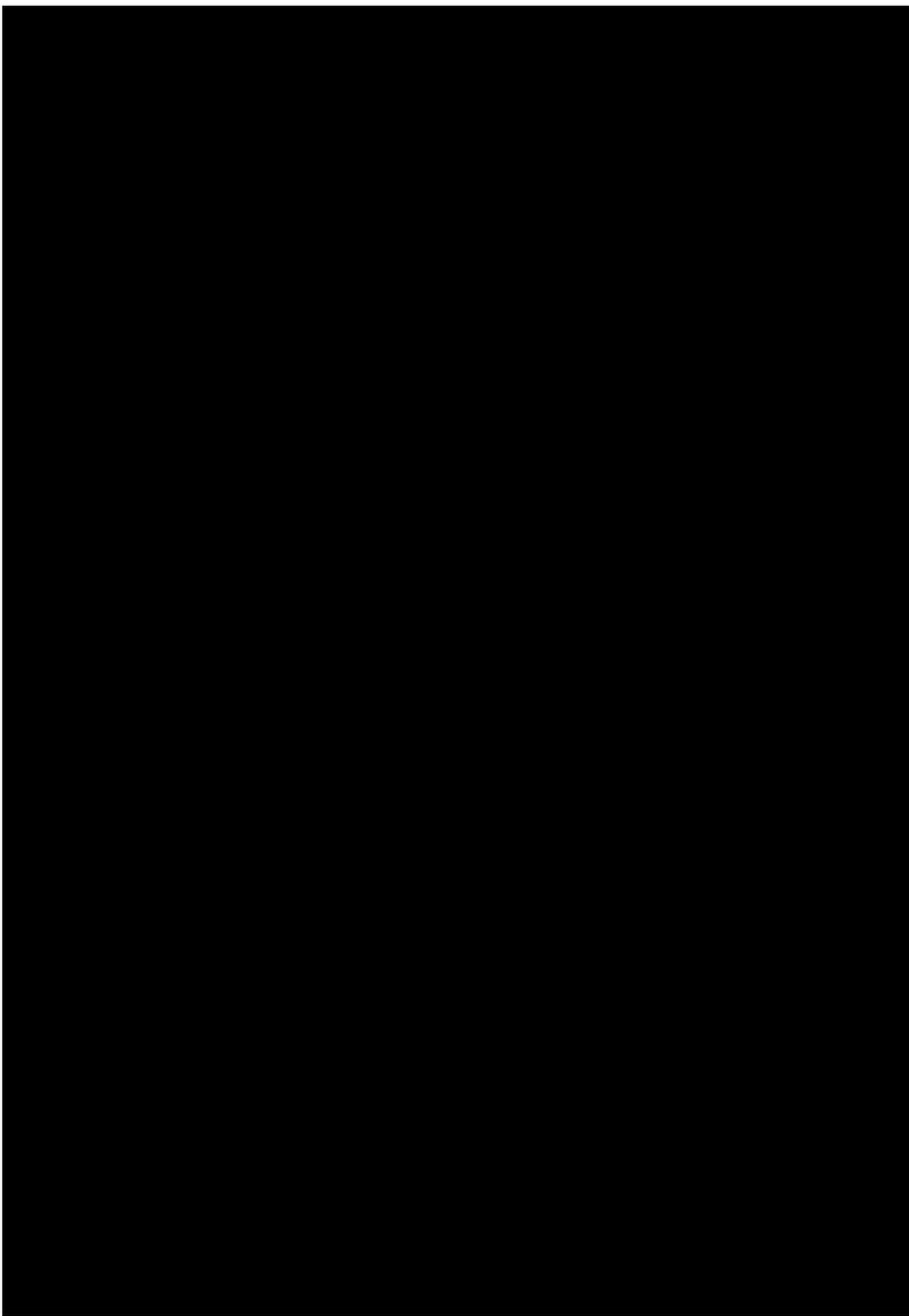
Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

Yes

Please provide further detail.:





Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:

College of Optometrists

4 Which category best describes you or the organisation you are responding on behalf of?

Optical professional/representative body

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

We believe that the most likely qualifications to be comparable to ETR compliant GOC approved qualifications are those required for practice in Australia ([https://www.optometry.org.au/wp-content/uploads/Professional\\_support/Guidelines/Final\\_Entry-level-Competency-Standard-for-Optometry-2022.pdf](https://www.optometry.org.au/wp-content/uploads/Professional_support/Guidelines/Final_Entry-level-Competency-Standard-for-Optometry-2022.pdf)), New Zealand and South Africa, subject to the caveats raised in our response to question four. Doctorates from other countries may also (more than) meet the requirements, but it seems unlikely that such candidates would form a cohort large enough to warrant the full and regular mapping exercises required to assure ongoing equivalence. It should be noted that the World Council of Optometry's new Optometry Curriculum Domains and Competencies (OCCD) is due for publication in the very near future, and this may form a useful framework for testing alignment between qualifications regimes globally. Other accreditation frameworks, such as the European Council of Optometry and Optics (ECOO) European Diploma in Optometry may also enable simplification of comparability of assessment processes.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Positive

Please explain why.:

1: Neutral, since there is no real change, beyond ensuring alignment with current UK qualification standards.

2: Positive: It is likely that the long delays currently experienced by candidates applying through the current system can be reduced if a standardised approach using "publicly accessible guidance, such as guidance produced by the optical sector on geographic equivalence" is developed and utilised. However, although it is an essential underpinning part of the proposals, it is not clear how such an approach will be funded, developed and maintained to ensure consistency across providers. It will also be simpler to administer application and admission processes through a single qualification provider (rather than two separate applications), but there is a risk of increased costs to applicants.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and

training requirements?

No

Please provide further detail.:

Not applicable

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Neutral

Please explain why.:

It is likely that some applicants will not need to undertake additional activity to qualify to practise in the UK, and this would represent a cheaper and more efficient route to UK registration. However, it is not clear how such applicants would be supported to navigate UK and local health and commissioning requirements and legal frameworks, which by their nature, are country specific. Example outcomes/indicators that must be evidenced as met include:

1.8 Refers and signposts as necessary to sight loss and other relevant health services.

3.5a(iv)... Appraises the need for and urgency of making a patient referral, using relevant local protocols and national professional guidance, and acts accordingly

3.5a(v) ...Adheres to legal requirements for the use and supply of common ophthalmic drugs.

4.3 Understands and implements relevant safeguarding procedures, local and national guidance in relation to children, persons with disabilities, and other vulnerable people.

It is also not clear how candidates will be consistently and correctly signposted to the correct application route without incurring unnecessary fees or delays. (Direct to GOC or to qualification provider).

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

GOC should incorporate assessment of "equivalent" non-UK qualifications into a process for direct application for registration. This would need to include clarity on which qualifications from which countries are accepted, and requirements for currency and CPD that are judged to be equivalent to those in use in the UK. All who do not meet the stated requirements should be directed to approved qualification provider(s).

Clear signposting is essential to prevent the requirement for assessment of any applicant more than once. Since UK providers may not be able to charge fees for admissions processes, and applications from holders of equivalent qualifications would not result in admission to a fee-paying course, it is inappropriate to expect providers to undertake assessment.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

It is possible that migrants and refugees may be impacted unfairly if support to navigate the new approach lacks clarity, involves long delays, or attracts increased costs.

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

It is possible that migrants and refugees may be impacted positively if support to navigate the new approach improves clarity, or reduces delays or costs.

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Q9 - Current and prospective providers of approved qualifications:  
Positive

Q9 - Placement providers:  
Positive

Q9 - Employers:  
Positive

Q9 - Devolved Nations:  
Negative

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

Yes

Please provide further detail.:

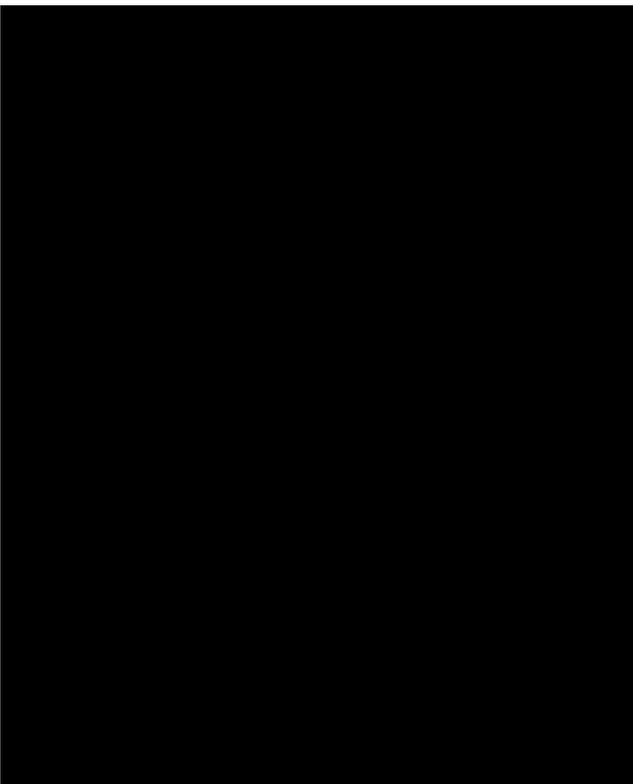
Further detail in relation to question 9.

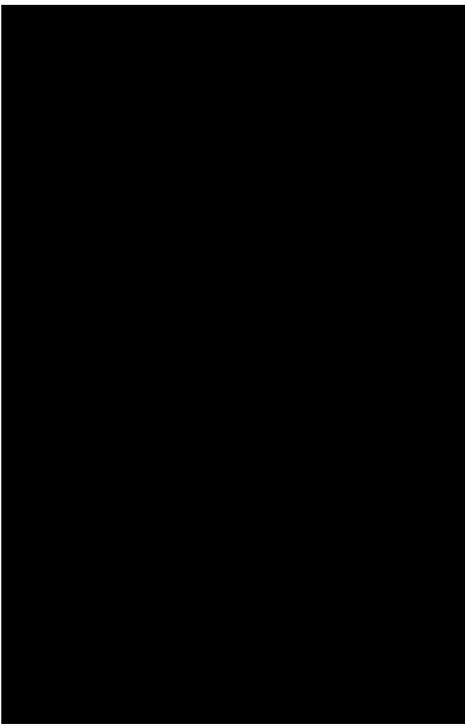
- a) Applicants from optical professionals who have qualified outside the UK or Switzerland Positive – through clarity and reduced delays
- b) Patients and the public Neutral – provided that individuals with equivalent qualifications admitted direct to registration are properly supported to navigate the national and local systems to ensure that patients' needs are met
- c) Current and prospective providers of approved qualifications Positive, through additional income stream. Negative through investment required to access it, and significant uncertainty about recouping costs / market share.
- d) Placement providers Positive, in terms of increased quantity and diversity of workforce. Negative, if too many variants of placement are in play due to range of providers.
- e) Employers Positive, in terms of increased quantity and diversity of workforce. Negative, if too many variants of placement are in play due to range of providers.
- f) Devolved Nations Negative, if the requirements and providers are not able to align with commissioning expectations.

12 Is the proposed implementation date realistic (September 2026)?

Yes

Please provide further detail.:





[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

[REDACTED]

2 What is your email address?

Email:

[REDACTED]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Optometrist

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

The ETR is laudable as procedures in optometric practice differs slightly from country to country even if the objective is the same. Personally, Optometry as a profession is all I know!

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Positive

Please explain why.:

I strongly feel that registering with the GOC as a body is important looking at the impact the practice has on the general populace and since it is health related, there should always be professional guilds to follow. Things might be easier though if International Optometrists or Dispensing Opticians go through or obtain certain courses that could make them integrate easily into the GOC system of operation.

[REDACTED]

So, priority can be given a certain category of international professionals who had further their educational career here in the UK more than the first degree of Doctor of Optometry O.D as we call it from my country.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

No

Please provide further detail.:

Things might be easier though if International Optometrists or Dispensing Opticians go through or obtain certain courses that could make them integrate easily into the GOC system of operation. [REDACTED]

So, priority can be given a certain category of international professionals who had further their educational career here in the UK more than the first degree of Doctor of Optometry O.D as we call it from my country.

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

Things might be easier though if International Optometrists or Dispensing Opticians go through or obtain certain courses that could make them integrate easily into the GOC system of operation. [REDACTED]

So, priority can be given a certain category of international professionals who had further their educational career here in the UK more than the first degree of Doctor of Optometry O.D as we call it from my country.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

Things might be easier though if International Optometrists or Dispensing Opticians go through or obtain certain courses that could make them integrate easily into the GOC system of operation. [REDACTED]

So, priority can be given a certain category of international professionals who had further their educational career here in the UK more than the first degree of Doctor of Optometry O.D as we call it from my country.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

I do not know whether there would be an impact on any individual or group!

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

I really do not know!

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Positive

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Negative

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

Yes

Please provide further detail.:

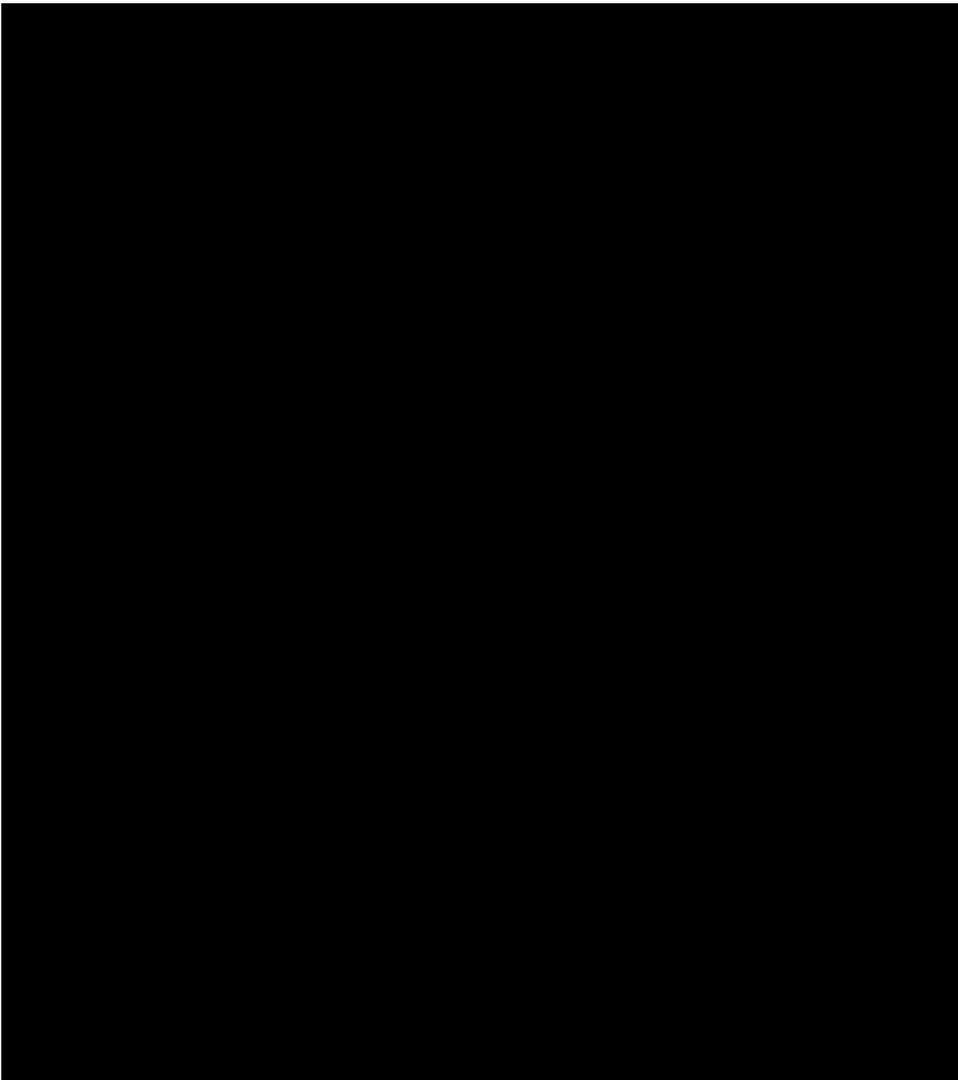
Things might be easier though if International Optometrists or Dispensing Opticians go through or obtain certain courses that could make them integrate easily into the GOC system of operation.

So, priority can be given a certain category of international professionals who had further their educational career here in the UK more than the first degree of Doctor of Optometry O.D as we call it from my country.

12 Is the proposed implementation date realistic (September 2026)?

Neutral

Please provide further detail.:





Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:

European Council of Optometry and Optics (ECOO)

4 Which category best describes you or the organisation you are responding on behalf of?

Optical professional/representative body

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

Graduates from optometry programmes in the US, Australia, New Zealand, Canada and possibly South Africa may meet or exceed the requirements of ETR. Given that in the future, and unlike the present time, such individuals may be allowed to join the GOC register without the need for any additional training, a careful mapping exercise is required. Given the number and possible heterogeneity of qualifications in even these countries, this mapping exercise represents a significant challenge.

In Europe, the European Council of Optometry and Optics (ECOO) Accreditation agency accredits providers against the standard of the European Diploma in Optometry (EDO). The EDO is set a level 3b of the WCO 4-level framework, which means that it includes the use of diagnostic but not therapeutic drugs in optometric practice. We believe that based upon the syllabus and content of the EDO (available at:

<https://ecoo.info/wp-content/uploads/2022/03/Part-II-ECOO-Accreditation-Self-Assessment-Document-Feb-2021.pdf>), together with the Clinical Portfolio element of the EDO (available at: <https://ecoo.info/wp-content/uploads/2022/03/Part-III-ECOO-Portfolio-Guidance-Feb-2021.pdf>), holders of this qualification might also be exempt from the need to undertake further training to meet the requirements of ETR. This again will require a careful mapping exercise where the content of the EDO is compared to the GOC-ETR Outcomes for Registration. As more providers become accredited for the EDO (see for information), it is possible that the EDO standard could provide the GOC with a useful means for assessing the level of training a graduate from a wide range of institutions (some of which are outside the EEA, e.g. Israel) holds.

We also have a standard and competency framework for Dispensing Optics, called the European Qualification in Optics, which may also be useful as a comparator to GOC-ETR outcomes for registration.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Negative

Please explain why.:

Ultimately the impact could be positive because graduates from outside the UK/Switzerland who hold qualifications that do not meet the GOC-ETR will take a GOC-approved qualification so as to make good the perceived deficiency in their training relative to ETR. However, it is not clear what form this qualification would need to take, given the diversity of qualifications (between countries, possibly even within countries and across timespans [where students may have graduated recently or in the distant past]). In other words, it is not clear how providers will be able to design a top-up course for such a diverse range of prospective entrants. The course that is designed is likely therefore to be a rather blunt instrument, requiring graduates from outside the UK/Switzerland with very different levels of training to undertake a broadly (or very similar) top-up course. It will not be feasible to have bespoke course content for individuals with different training backgrounds. Also, given that UK providers are likely, in the short to medium term, to be fully occupied with delivering their new programmes in optometry and dispensing, it seems unlikely that many/any will have the capacity to think about course design and development for non-UK/Switzerland optometry graduates.

Thus there are concerns about timeframe for implementation (see later response to Q 11). However, once the course(s) is/are approved by GOC, the management of the system will be considerably simpler for the GOC because the providers will not (as now) need to undertake individual registration assessments. While this will ultimately be easier from a management point of view, it is not clear that the proposed new system will provide an effective means for handling applications from non-UK/Switzerland optometry graduates.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Yes

Please provide further detail.:

If courses in optometry/dispensing were encouraged to benchmark themselves against a common standard then it would be simpler for providers to establish where deficiencies lie relative to ETR, and therefore to design a course to meet these deficiencies. Such a standard already exists, the EDO for Optometry and the EQO for dispensing. Similarly, the WCO competency framework could be useful in this regard. This would involve the GOC mapping the EDO/WCO content and requirements against the GOC's ETR. Were such a mapping conducted, it would be possible to have ECOO conduct accreditations, the results of which could inform prospective providers and the GOC about what a top-up course might need to include.

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

Our understanding is that the GOC currently asks recent graduates from programmes in the USA to conduct the SFR. However, this seems inappropriate as such individuals may well meet (and probably exceed) the GOC-ETR without the need for any additional training. It is appropriate for some graduates from outside UK and Switzerland to be allowed to join the registers directly and it is a positive development that the GOC is proposing this.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

The answer given assumes that the GOC will already have (or will conduct) a detailed review and mapping exercise of qualifications in a small number of candidate countries (e.g. USA, Australia/NA, Canada) where the graduates may meet/exceed ETR. Thus, there could be an arrangement where graduates from programmes in country xx who graduated after xx/xx/xxxx can be considered for direct entry to the register. This would obviously involve a form of accreditation by the GOC, but could take the form of a desk-based exercise rather than accreditation involving visits etc.

In the interests of independence, it would be better not to have the provider of a course evaluate a prospective student for that course. Also, in the interest of consistency of approach, we would not support a system where the applicant chooses whether to send to the GOC or to a provider.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

No obvious impact (+ve or -ve) any group.

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

No obvious impact (+ve or -ve) any group.

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Q9 - Patients and the public:

Q9 - Current and prospective providers of approved qualifications:

Q9 - Placement providers:

Q9 - Employers:

Q9 - Devolved Nations:

Q9 - Other (please specify below):

Positive

Please specify 'other':

a) Applicants from outside UK/Switz: It depends! It will obviously benefit those who have graduated from courses that meet or exceed the ETR. While the system is being set up it could delay graduates when their training is deemed not to meet ETR. Also, the extent to which a bespoke approved course for an individual applicant can be offered is likely to be extremely limited with the result that the top-up course will (as now, where all complete the SfR) be a rather blunt instrument b) Pxs and the public: provided applicants already meet or, with an approved course, meet the outcomes for registration there should be no impact c) Current and prospective providers of approved qualifications: they will have to decide whether or not to offer a course and to seek accreditation for this if they decide to proceed. This will take a large amount of effort at a time when providers are already likely to be extremely well occupied with delivering their MOptom and dispensing courses. d) Placement providers: Neutral/Difficult to say at present. Will probably not differ too much from existing situation where applicants to join the GOC register complete SfR. In the new system, it is likely they will end up taking the College's CLiP modules (for those providers partnering with the College), with all that this will entail. If the numbers grew large, there could be an excessive burden. e) Employers: Neutral/Difficult to say at present. It will have an impact if their trainees are only available for work 4 days per week, instead of 5 as now. f) Devolved nations: No clear idea of how/whether this could affect the situation differently in the devolved nations g) Other: N/A

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

No

Please provide further detail.:

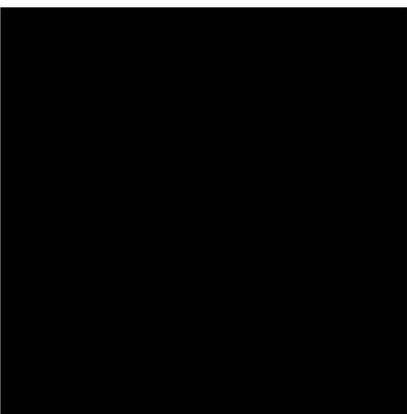
12 Is the proposed implementation date realistic (September 2026)?

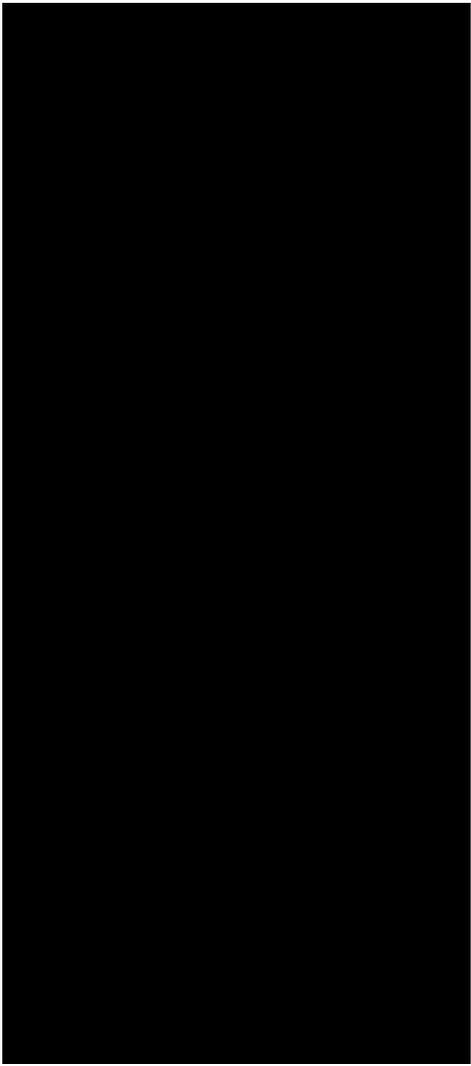
Neutral

Please provide further detail.:

Providers are very busy at present dealing with the new ETR landscape and it is difficult to see how they will have time to design and seek approval from GOC for a new course aimed at graduates from outside UK/Switzerland.

A lead in time period (e.g. 1 year) could be very useful here where each application is assessed under the old and the (proposed) new system. This might help to identify potential early pitfalls with the new system before it becomes operational.





[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Education provider

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

Do not have sufficient evidence to respond

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Negative

Please explain why.:

As a university we are not resourced to handle the volume of applications that would likely be received, including assessing the evidence on prior learning, experience, qualifications etc. The significant time taken to assess the information from one candidate may not even result in their accepting an offer.

A likely scenario would be that applicants would apply to a number of universities with the same information, each of which would spend time assessing their evidence, representing a decrease in efficiency from the current process.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Yes

Please provide further detail.:

A central assessment such as that currently in place offers more consistency and efficiency than the proposals being considered.

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the

UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

This seems logical for those who already meet the requirements

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

For consistency of approach all applications from all overseas qualified practitioners, assessment should ideally should be done centrally.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

Assessment should be based upon academic achievement and demonstrable experience.

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

Assessment should be based upon academic achievement and demonstrable experience.

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Negative

Q9 - Patients and the public:

Negative

Q9 - Current and prospective providers of approved qualifications:

Negative

Q9 - Placement providers:

Negative

Q9 - Employers:

Negative

Q9 - Devolved Nations:

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

No

11 Are there other impacts (positive or negative) we should consider?

Yes

Please provide further detail.:

There is impact on participating providers of receipt and analysis of multiple applications for what may amount to a very small number of students, bearing in mind that the GOC places a cap on student numbers.

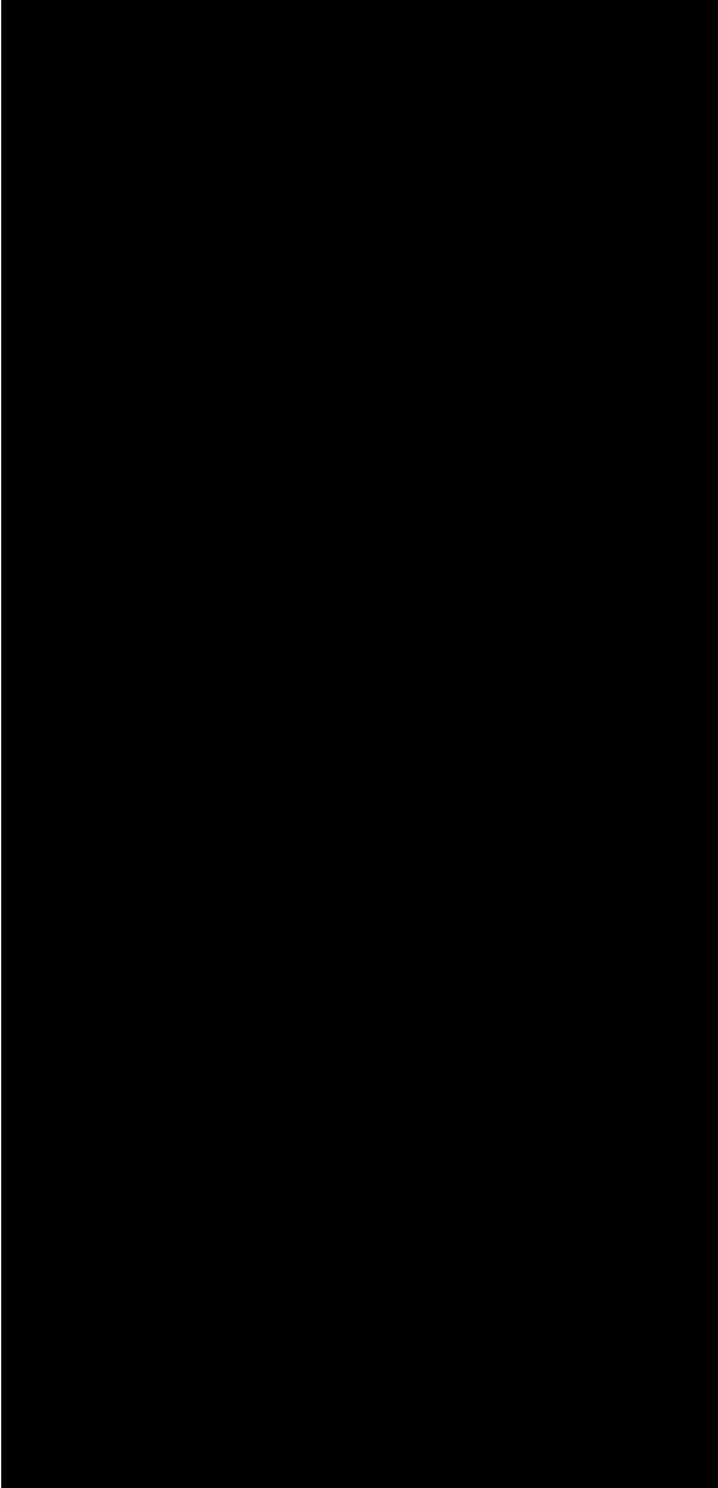
There could be a reduction in choice of institution for applicants, should most providers chose not to participate in the new scheme.

12 Is the proposed implementation date realistic (September 2026)?

Neutral

Please provide further detail.:

My institution is not likely to participate in the new proposals



[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

[REDACTED]

2 What is your email address?

Email:

[REDACTED]

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:

Association of Optometrists

4 Which category best describes you or the organisation you are responding on behalf of?

Optical professional/representative body

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

The table on page 20 of the ECOO-Professions Scope of Practice Blue Book 2020 (<https://tinyurl.com/3hxt727>) sets out the scope of optometrist competencies separated into that permitted, prohibited, and practised by European countries. It demonstrates the greater scope of optical skills practised in the UK relative to other European states. This reflects the comprehensive nature of UK optometric education in which graduates are furnished with professional skills over and beyond the scope of practitioner requirements within optical practices. In our view, the solid foundation provided by UK university optometric education is bolstered by the UK's effective regulatory and legislative environment which balances robust public safety mechanisms with the UK's diverse, patient-choice orientated range of optical practice types and business. Accordingly, the UK has the largest optometric workforce in Europe and a sizeable dispensing workforce as well.

In the rest of Europe, the ECOO accreditation system of the European Diploma has been welcome and represents a comparable competency with UK entry level university optometry education. However, few European universities are currently accredited with the European diploma.

For these reasons, we do not feel there are any European countries where there is comparable activity or scope of practise. Even in countries such as the Netherlands which permits a greater scope of optometric practise, the lack of regulation and general variability in regulation removes assurance and presents significant risk. Regarding Switzerland, our understanding is that there is already an agreed process for applicants from Switzerland, but clarity would be welcome. Outside of Europe, there are countries where there are comparable qualifications enabling a wide scope of practise such as Australia and the US but, again, there is some variability here. For example, in the US, whilst all qualifications in Optometry are postgraduate qualifications, there are differences in their range and content depending on the state in which one studies. However, it appears that the scope of practice in all is at least equivalent to the UK.

In terms of the UK professional health care environment, the existence of the NHS – a largely unique health system – adds an additional level of complexity for non-UK providers considering relocation to the UK. By the same measure, and while UK optometrists themselves relocating overseas are not in scope here, it is likely that these optometrists face a similar difficult adjustment to other countries where there is no state-health care provider equivalent to the NHS.

As a final point, we believe the high level of optometric education in the UK is indicative of the potential for UK optometrists to deliver a greater range of optometry clinical services than is presently the case. While non-core (GOS) services have expanded throughout England in recent years, and the Scottish and Welsh commissioning systems allow for a greater scope of care than core GOS-alone, there is still much more scope for innovative commissioning to

help meet Government and NHS objectives for more out of hospital care, integrated care and preventative care. These sorts of services are within optometrists' core competencies as per the UK's extensive practitioner education system. At the same time, we recognise the clinical importance of post-graduate accreditation programmes (such as that provided by Cardiff University's Wales Optometry Post-Graduate Education Centre: <https://wopec.co.uk/>) for underpinning these competencies and where appropriate, assuring commissioners and the regulator of optometrists' ability to provide non-core primary eyecare services to the public.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Neutral

Please explain why.:

We feel as long as the same standards are applied, the impact will be neutral in terms of management. It will however shift the administration assessment burden from the GOC to GOC-approved qualification providers (universities in the case of optometry) which for a small cohort may not be economically viable and potentially affect the current intake spread of students into universities.

It is also important that the requirements of the GOC approved qualification are fully understood by qualification centres and applicants, including timescales, methods of study, and minimum standards necessary to pass.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Not Answered

Please provide further detail.:

N/A

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Neutral

Please explain why.:

Our understanding of this proposal as per Figure 1 in the consultation papers is that this method will act alongside the qualification route with outcomes for individuals being either a) immediate entry into the GOC register, or b) a requirement to go through the qualification route. More clarity on which individuals this concerns from the GOC would be welcome. In general, as the proposed numbers are very small, we do not expect this to have a significant impact.

However, we feel the GOC should clarify the nature of the revalidation of skills. Will optometrists relocating to the UK be assessed on their practise competencies for every competency required of UK optometrists, or will assessment be based on individuals' declared historical scope within optical practice settings? In order for clinically safe treatment to be provided to the public, we feel that the former is more appropriate as a mandated set of requirements for optometrists qualifying outside of the UK or Switzerland.

Regarding universities, it is our understanding that they are not in a position to provide assessments for optometrists from overseas, nor are they in favour of adopting this position. The GOC as it stands provides an interview which the small number of optometrists in question can take which helps to keep professional relocation costs low.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

For consistency and parity, we believe this requirement should remain with the GOC. Option c) would potentially serve to confuse applicants and perhaps qualification centres if the individual was deemed required to enter the qualification phase following an application as per Question 4.

Given that the qualification route is proposed to now run through other GOC-approved centres, and the low expected numbers for the direct registration route, the administration burden to the GOC will be low.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:  
Negative

Q9 - Patients and the public:

Q9 - Current and prospective providers of approved qualifications:  
Negative

Q9 - Placement providers:  
Negative

Q9 - Employers:  
Negative

Q9 - Devolved Nations:  
Negative

Q9 - Other (please specify below):

Please specify 'other':

a) Applicants from optical professionals who have qualified outside the UK or Switzerland – The wider ETR changes mean that it is unclear how the final year, which will now incorporate and replace the traditional pre-reg, will work. There is a risk that these changes may mean this route to joining the UK register is no longer available. b) Patients and the public As the numbers involved are small, it is unlikely that if this route to joining the UK register is removed that there will be a significant impact on the wider workforce. Patients and the public should not be unduly affected by these proposals given the large, skilled optometric workforce that exists in the UK. c) Current and prospective providers of approved qualifications As the numbers of potential students are low and that administration will pass to qualification providers from the GOC as is currently the case, we are of the view that this may inhibit new entrants to the market and force those already involved to exit. This risk in our view calls the proposals into question. d) Placement providers It is our view that under the new arrangements that these applicants will not be an attractive option for placement providers due to the complexity of funding and university engagement, as well as greater administration. e) Employers As above. f) Devolved Nations For Scotland the rules around tuition fees are likely to prohibit overseas placements as is the requirement that placements also consider IP.

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

Yes

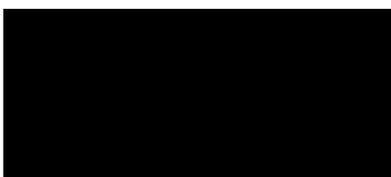
Please provide further detail.:

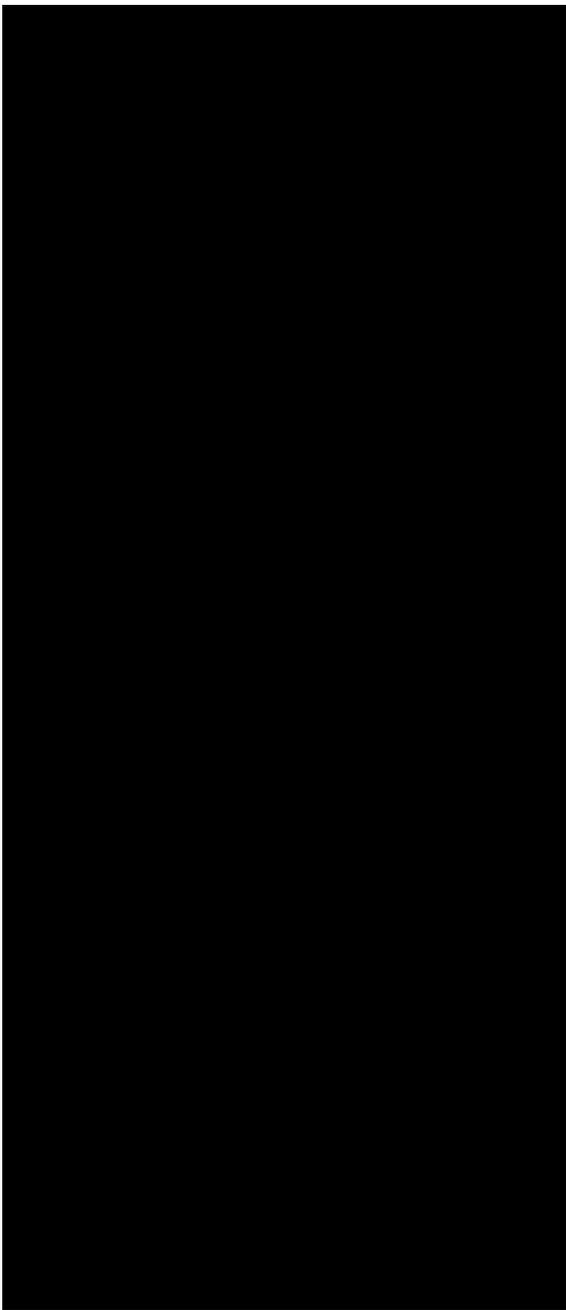
We are concerned that the low numbers may mean that most universities do not consider this to be a viable proposition. While this relates to wider ETR changes and the GOC have suggested that they are out of scope, it is our view that this is an unintended consequence of the ETR process.

12 Is the proposed implementation date realistic (September 2026)?

Neutral

Please provide further detail.:





[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Optometrist

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

The most obvious qualification is the European Diploma in Optometry which was always designed to be aligned to the competencies required for GOC registration without a qualifying year as specified by the College of Optometrists scheme for registration.

Qualifications awarded in Ireland [REDACTED] would be logical due to national proximity and automatic working permissions, however, the Irish qualification and scope of practice does not include the use of diagnostic drugs.

Any qualifications awarded in the former commonwealth countries of Australia, New Zealand and Canada as well as the United States of America. These all exceed by some considerable way the current UK entry level scope of practice. In fact there is an anomaly in that all four of these jurisdictions qualify optometrists as competent in the use of ophthalmic therapeutics and so should automatically be considered to join the Specialist Register. That there are few of these at present is because the UK applies a disproportionately high threshold.

In some jurisdictions; USA and Canada and one state in Australia optometry is a second degree undertaken, to Masters level (commonly called an OD (Dr of Optometry) AFTER a first biological science degree has been completed.

[REDACTED]

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Negative

Please explain why.:

1. The work is outsourced to the course provider so could be positive for proposal 1 unless that international provider does not apply for recognition.

2. There is no point in undertaking individual assessments unless the applicant has already completed a course to an appropriate level of qualification and that course is not already approved, in which case how will they get registered? Negative for proposal 2.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Yes

Please provide further detail.:

[REDACTED] appoint independent experienced qualified registrant assessors with educational knowledge (maybe 2 per applicant) who can assess evidence, course transcripts and practical experience and determine suitability for: rejection, acceptance or review. Plus an appeals process.

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

Simply logical and fair. Should one too expensive. [REDACTED] appoint independent experienced qualified registrant assessors with educational knowledge (maybe 2 per applicant) who can assess evidence, course transcripts and practical experience and determine suitability for: rejection, acceptance or review. Plus an appeals process.

The fee paid by the applicant would be tax deductible at 40% so do not hold back at charging an appropriate fee to remunerate the GOC administration as well as the assessor(s). In my experience to undertake a detailed assessment of an entire transcript and assess experience takes upwards of 2 to 4 hours.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

The applicant may choose between either of the two routes above

Please explain why.:

Or an independently appointed assessor would be delegated from the GOC application

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

No. Competency at performing the skills set of a registrant optometrist or dispensing optician is the only consideration. As an example someone who is significantly visually impaired e.g. no functional vision, would be unable to undertake the tasks of an optometrist and so could not be registered. This should not be seen as unintentionally disadvantaging the application as it would clearly be intentional.

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

No. Competency at performing the skills set of a registrant optometrist or dispensing optician is the only consideration.

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:  
Negative

Q9 - Patients and the public:  
Negative

Q9 - Current and prospective providers of approved qualifications:  
Negative

Q9 - Placement providers:

Negative

Q9 - Employers:

Negative

Q9 - Devolved Nations:

Negative

Q9 - Other (please specify below):

Negative

Please specify 'other':

In my opinion the proposal lack the specificity to understand exactly what might happen ?

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

No

11 Are there other impacts (positive or negative) we should consider?

Yes

Please provide further detail.:

The UK is a global player in optometry education, research and professional behaviour. In order to be an educator at a UK optometry university most optometrists or dispensing would be expected to register with the GOC so they can undertake clinical teaching. Making this process unacceptably onerous denies UK student optometrists and dispensing opticians the opportunity to interact and understand. It also denies UK patients the experiences, research and teaching that could be imparted to their future practitioners.

I think the previous system pre and post Honey Rose has inadequately balanced risk and benefit and has taken the easy, perceived as prejudicial, option of making registration in the UK onerous and expensive. It should be perfectly possible to appoint assessors and arrange for individual competency assessments when necessary.

12 Is the proposed implementation date realistic (September 2026)?

No

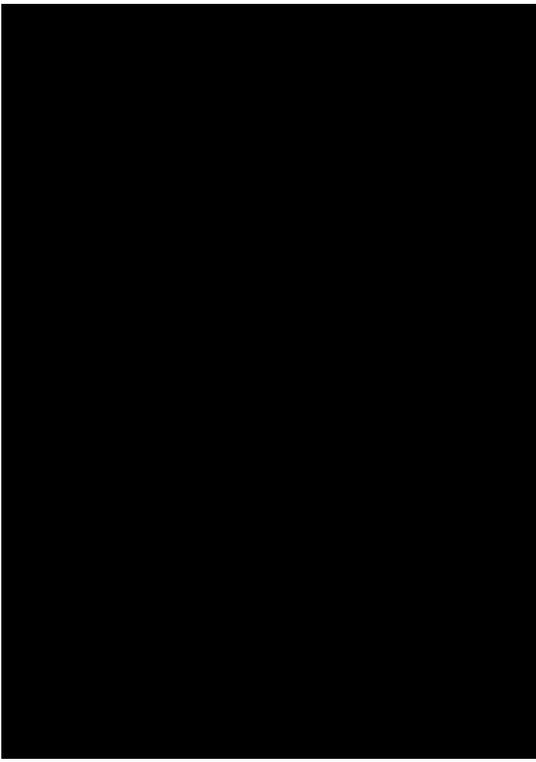
Please provide further detail.:

Because I find the proposals ambiguous and difficult to understand, I think you need to spell out how some salient examples might work.

I also do not understand how and when Switzerland was lumped in as a comparable qualification implying automatic registration. In Europe Sweden and Norway (outside the EU) at least are already directly comparable and at one stage the European Diploma plus Netherlands and Ireland were granted reciprocity ? Has there been a risk assessment of whether these previous satisfactory registrations have led to increased FTP cases ? Are international registrations high risk in terms of FTP ? I don't believe that they are apart from one significant case.

Finally the anomaly of failing to recognise registrations with therapeutic competency (USA/Australia) onto the UK IP specialist register is tantamount to restraint of trade.





## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:

FODO - the Association for Eye Care Providers

4 Which category best describes you or the organisation you are responding on behalf of?

Optical professional/representative body

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Negative

Please explain why.:

There will likely be some positive and some negative impacts - but not able to select both.

FODO has been a longstanding supporter of the ESR, and then ETR, and of developing the eye care workforce for the future. FODO fully supports the need to ensure all overseas qualified individuals meet the same standards as those qualifying in the UK.

We welcome the commitment in paragraph 1.12 regarding the importance of ensuring the GOC's regulatory approach is proportionate and that the registration processes meet employer and workforce need.

However, the GOC is not only changing the criteria against which applicants are assessed (as is appropriate to align with the ETR) but is also changing the process by which this is assessed – putting the onus on self-assessment, rather than GOC staff assessing and suggesting the route which applicants would need to follow, as per the current process. This might put some people off considering this as noted at paragraph 2.18b.

The additional cost to HEIs of developing and maintaining GOC approved qualifications for overseas qualified individuals, and in assessing applications for advanced standing, will be passed on to those individuals and therefore the costs associated with the route to GOC registration will likely be increased compared to currently. Again, this might put some people off considering this. Passing these additional costs from the individual to an employer, as is suggested at paragraph 2.19c and 2.19d, will increase costs to employers which is not appropriate.

In addition, there is a risk that the ETR might result in fewer graduates overall, at a time when the NHS is seeking to bring care out of hospital for delivery by primary eye care providers and so increasing the workforce is very important. This new, somewhat less-welcoming approach from the GOC to

overseas qualified individuals might act as a discouragement to otherwise enthusiastic applicants at the very time as they are most needed.

We note the GOC's suggestions at 2.2, 2.7 and 2.18c for optical sector guidance on geographic/territorial equivalence and benchmarking guidance re RPL. It would be useful to understand where the GOC sees this guidance being developed – by whom/in what forum, and timescales for this.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Yes

Please provide further detail.:

FODO agrees that the criteria against which overseas applicants are assessed should align to the education and training requirements for UK GOC-approved qualifications, however we are concerned that the removal of the pre-assessment by the GOC and provision of advice to applicants will prove detrimental.

This current GOC pre-assessment provides a useful resource to potential applicants and to remove it would likely make them feel isolated (plus see above point about the development of sector guidance). It also provides a single uniform process, that ensures consistency of decisions made - to remove this and place the onus on individuals and HEI providers will erode this consistency.

While employers (or potential employers) of such individuals will play their part in supporting them through the process, there should be very clear, comprehensive GOC guidance which allows an appropriate self-assessment and to understand where there are gaps. The GOC should also provide a list, with contact details, of the relevant education providers to direct appropriately. A GOC advice service to support people who have questions or are unsure on their self-assessment, would be highly beneficial - both to the individual and to ensure consistency. As mentioned in paragraph 1.21 the GOC's processes for managing applications from optical professionals qualified overseas requirements may be perceived as difficult to navigate.

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

Assuming that meeting the ETR requirements is the only criteria for overseas qualified individuals, then the College/ABDO examinations would be removed – this removes a cost for the applicant (or their employer) as well as a further step in the process to registration.

We assume the fee for this assessment will be less than currently due to the reduced processing. Therefore, this will be positive for the individual applying.

Again, there should be very clear, comprehensive GOC guidance which allows an appropriate self-assessment and to understand if there are gaps, including advice around what evidence will be required for this route.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

Assuming the applicant will need evidence of them meeting the GOC requirements, and is advised what evidence will be accepted, this may be an administrative process and may therefore not be the responsibility of education providers.

Having said that, the GOC might make use of those who work for providers of approved qualifications, in the assessment process – given the suggested numbers of applications through this route it would not make sense for the GOC to employ someone for this sole purpose (especially if the cost of such a role is borne by GOC registrants more widely).

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Q9 - Patients and the public:

Q9 - Current and prospective providers of approved qualifications:

Q9 - Placement providers:

Q9 - Employers:

Negative

Q9 - Devolved Nations:

Q9 - Other (please specify below):

Please specify 'other':

This is difficult to answer as there will be some positive and some negative elements. Applicants and providers of approved qualifications will have both positive and negative elements. Patients and the public, placement providers and devolved nations will likely have no real impact (if comparing the current process and the proposed new process). Employers will have a net negative impact - compared to currently its likely to be more expensive. The argument that employers will be happy to bear the cost as they need/want the additional workforce is currently there and wont change, the likely additional cost will be the main issue.

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

No

11 Are there other impacts (positive or negative) we should consider?

No

Please provide further detail.:

We have answered 'No' to questions 10 and 11 as much of the impact assessment is left for respondents of the consultation to complete, rather than the GOC undertaking a full assessment itself.

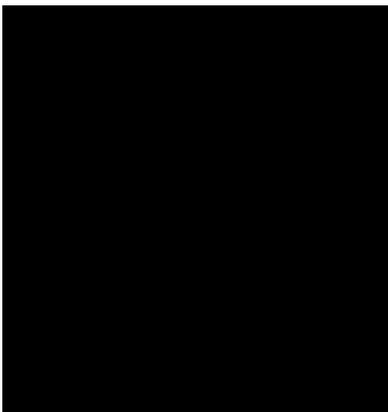
12 Is the proposed implementation date realistic (September 2026)?

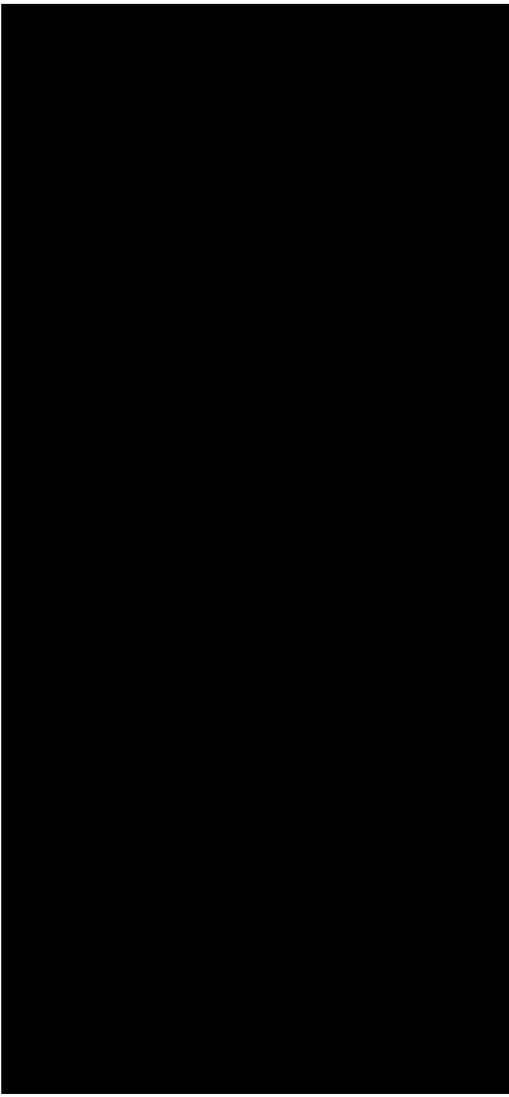
No

Please provide further detail.:

September 2026 is likely to be the start of the first year that any education provider is able to deliver the final year of the new ETR programme, and the first year of the new placement (for the majority of programmes) for employers/placement providers. Implementing this process change for overseas qualified individuals from that year is not advisable as the underpinning education programmes will still be in development/implementation.

We are not sure that education providers in the UK will be able to develop a separate/complementary programme for overseas qualified individuals within this timeframe, or indeed a process for recognition of prior learning when they have not completed the implementation of their new ETR programmes. We suggest it would be better to wait until a complete cycle of the core UK programmes have been completed by all providers that are planning to provide a programme/route for overseas graduates. Therefore, we recommend the implementation of this new process should commence from September 2027 at the earliest.





[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

[REDACTED]

2 What is your email address?

Email:

[REDACTED]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Optometrist

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

I want to offer the following insights on overseas qualifications that may be comparable to GOC-approved qualifications in optometry or dispensing optics meeting the new ETR.

Comparable Qualifications:

Doctor of Optometry (O.D.) from Accredited Institutions in the United States and Canada: The O.D. programs in the U.S. and Canada offer an intensive four-year curriculum that is similar to the U.K. system. Moreover, the licensure exams in these countries are rigorous and focus on theoretical and practical skills, making them closely aligned with the GOC standards.

Diplom and B.Sc. Optometrist from Germany: The Diplom and B.Sc. degree from Germany involves an extensive curriculum focusing on optometry and vision sciences, mainly with a final thesis aligning with a GOC-approved program's academic rigours.

Bachelor of Optometry (BOptom) from Australia: The BOptom programs from Australian universities are similar in curriculum structure to U.K. programs and offer an extensive clinical component

Master of Science in Optometry from Universities in the European Union: Some E.U. countries offer an MSc in Optometry geared towards research and clinical practice. These qualifications often exceed ETR standards due to the rigour of the European Higher Education Area framework.

Reasons for Comparability:

Curriculum Depth: The programs mentioned offer an in-depth curriculum that covers all essential aspects of optometry, comparable to U.K. programs.

Clinical Training: These programs often require extensive clinical training, ensuring that graduates are practice-ready, aligning with GOC's ETR.

Research Orientation: Most of these programs require a thesis or equivalent research project, emphasizing the importance of evidence-based practice.

Quality Assurance: These programs are usually accredited by reputable bodies, ensuring high standards.

Examination Rigor: The exit exams for these qualifications are thorough and designed to test theoretical and clinical competency.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified

outside the UK or Switzerland?

Positive

Please explain why.:

Proposal 1:

Negative Impact: Requiring all international applicants to complete a GOC-approved qualification could be considered an overly stringent requirement that may disincentivize highly qualified optometrists from other jurisdictions from practising in the UK. This requirement could also limit the diversity of skills and experiences in the UK's optometry field, as it does not account for potentially equivalent or superior qualifications obtained overseas. Additionally, it could represent a financial burden for international applicants, especially given the current average fees cited for international optometry students.

proposal 2

Neutral Impact: The elimination of individual registration assessments before enrolling in a GOC-approved qualification streamlines the application process and reduces costs for the applicant. However, this could potentially risk admitting applicants who may not meet the ETR requirements, relying solely on the training program to filter them out later. This places a greater responsibility on GOC-approved educational institutions to ensure candidate suitability, which may vary in effectiveness depending on the institution.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Yes

Please provide further detail.:

Reciprocity Agreements: The GOC could enter into reciprocity agreements with regulatory bodies (or similar) from countries with equal or superior educational and training standards for optometry. This would enable overseas professionals to become registered with the GOC more smoothly while maintaining high professional standards.

Pre-Assessment of Foreign Qualifications: Rather than completely doing away with individual assessments, the GOC could consider a pre-assessment phase that evaluates applicants' foreign qualifications and experiences. This would serve as a filter to determine which candidates may proceed directly to registration and which would need additional training or qualifications.

Flexible Bridging Programs: Create short, specialised "bridging programs" that allow foreign-trained professionals to fill in any gaps in their education or training rather than requiring them to complete an entire GOC-approved qualification.

Standardised Equivalency Exams: Instead of doing away with individual assessments, consider implementing a standardised exam to assess the equivalency of overseas qualifications to GOC standards. This would allow professionals with differing educational backgrounds to demonstrate their competence uniformly.

Cost Mitigation: Introduce financial support or subsidies for foreign-trained professionals who must undergo additional training or qualifications to offset the financial burden and incentivize more to apply.

Transparent Review Process: The GOC should ensure that the review and equivalency determination processes are transparent, unbiased, and based on robust evidence and statistical analysis.

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Neutral

Please explain why.:

Limited Scope: The proposal expects such applications to be rare, which may discourage qualified overseas professionals from considering this pathway. Given that these applications are rare, the measure could be seen as symbolic, offering little practical utility.

Financial Barrier: Including a fee for this specialised assessment, especially without clear guidelines on how "meeting or exceeding requirements" is determined, could become a financial barrier for overseas professionals. This could be particularly concerning for professionals from lower-income countries.

Administrative Complexity: While the proposal aims to provide flexibility, it might introduce an additional layer of administrative complexity involving case-by-case assessments that could be time-consuming and resource-intensive for the GOC. This might divert resources from other essential functions of the organisation.

Equity Concerns: The case-by-case nature of assessments might lead to inconsistencies and potentially biased outcomes. Even with rigorous quality assurance processes, individual assessments are more susceptible to subjectivity.

**Regulatory Uncertainty:** The proposal's ambiguous terms, such as "meet or exceed the requirements," could lead to regulatory uncertainty. Applicants might find it difficult to assess whether they qualify for this pathway, which could deter potentially qualified candidates.

**Impact on Employers:** The lack of a standardised framework may make it harder for employers to navigate the sponsorship and hiring process.

**Unaddressed Workforce Shortages:** It's worth noting that if the proposal effectively turns away or discourages competent overseas professionals, it might not serve the public interest in the long term, especially if there are workforce shortages in optometry and dispensing optics in the UK.

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

The applicant may choose between either of the two routes above

Please explain why.:

**Flexibility and Choice:** Providing applicants with multiple routes to apply ensures they can opt for the process most aligned with their qualifications and needs. Given diverse expertise, applicants are likely to appreciate that a one-size-fits-all approach seldom effectively serves the needs of a diverse applicant pool.

**Expertise and Context:** Providers of approved qualifications possess the contextual knowledge and specialised expertise to assess the qualifications of applicants efficiently. They can also consider the applicant's academic and practical exposure to align with the specific course's requirements. This would be crucial for maintaining educational and professional standards.

**Regulatory Oversight:** Direct applications to the GOC offer standardisation and regulatory oversight that ensures fairness and objectivity in the admission process. The GOC can act as an unbiased entity and could be more equipped to ensure that the applicant meets all legal and professional requirements for practice in the UK.

**Time and Resource Management:** Given your experience in the academic sector, it's easy to appreciate that each route could have different time and resource implications. Providers might offer quicker assessments but may have limited administrative capabilities, while the GOC, although possibly slower due to regulatory requirements, could offer a more comprehensive evaluation.

**Broadening the Talent Pool:** From a health and medical perspective, and given your international work, offering both routes could expand the talent pool and ensure a more diverse range of qualified professionals enter the UK healthcare system, enhancing patient care and innovation in the field.

**Accessibility and Costs:** The cost implications could vary between the two routes. It might be essential to consider how each course impacts the financial burden on the applicant and, therefore, the accessibility of the pathway to a diverse range of candidates.

**Credential Recognition:** Directly involving providers and the GOC can help better recognise and equivalence of foreign qualifications, making it easier for international professionals to integrate into the UK system.

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Age, Disability, Gender Reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sexual orientation

Please describe the impact on the individuals or groups that you have ticked.:

**Age:** Older professionals might find adapting to new educational and qualification requirements more challenging, mainly if they have been practising for a long time in a different jurisdiction.

**Disability:** Accessibility can be a concern, particularly in practical examinations or clinical training settings. Reasonable accommodations must be in place for disabled applicants.

**Race:** The relevance of considering how systems of qualification in the home countries of racially diverse applicants are valued and assessed by the GOC and educational providers. There may be unintentional biases in the evaluation of qualifications from specific regions.

**Religion or Belief:** Training and examination schedules could conflict with religious observances, disadvantaging specific individuals.

**Pregnancy and Maternity:** The length of programs and timing of examinations could have implications for those who are pregnant or have maternity needs, potentially disadvantaging them in the registration process.

**Sex and Gender Reassignment:** Some healthcare settings can be discriminatory or not fully inclusive, affecting people who have undergone gender reassignment or may face gender discrimination.

**Sexual Orientation:** While not directly related to qualifications, a hostile or discriminatory educational or clinical training environment could disadvantage LGBTQ+ individuals.

**Marriage and Civil Partnership:** There could be issues of spousal sponsorship for visas or the availability of visas for partners, which might affect these

individuals differently.

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Age, Disability, Gender Reassignment, Race, Religion and belief, Sexual Orientation

Please describe the impact on the individuals or groups that you have ticked.:

Age: Younger professionals who are more adaptable to newer technologies and educational formats might find it easier to navigate the requirements for registration, potentially benefiting them.

Disability: If the GOC incorporates digital assessment and learning tools that adhere to best practices for accessibility, individuals with disabilities might find it easier to complete their qualifications.

Race: A standardised and transparent process for international qualifications could benefit racial and ethnic minorities by reducing the scope for unconscious bias in the registration process.

Religion and Belief: Providing flexibility in exam schedules to accommodate religious observances would positively impact individuals of specific faiths.

Sex and Gender Reassignment: Including mandatory training on inclusivity for evaluators would positively impact women and those who have undergone gender reassignment by fostering a more equitable assessment environment.

Sexual Orientation: Inclusion training could also benefit LGBTQ+ individuals by ensuring that assessors and other professionals involved in the registration process are sensitive to issues related to sexual orientation.

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Positive

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Positive

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

Not Answered

Please provide further detail.:

Financial burden on international applicants, especially if they are from low or middle-income countries.

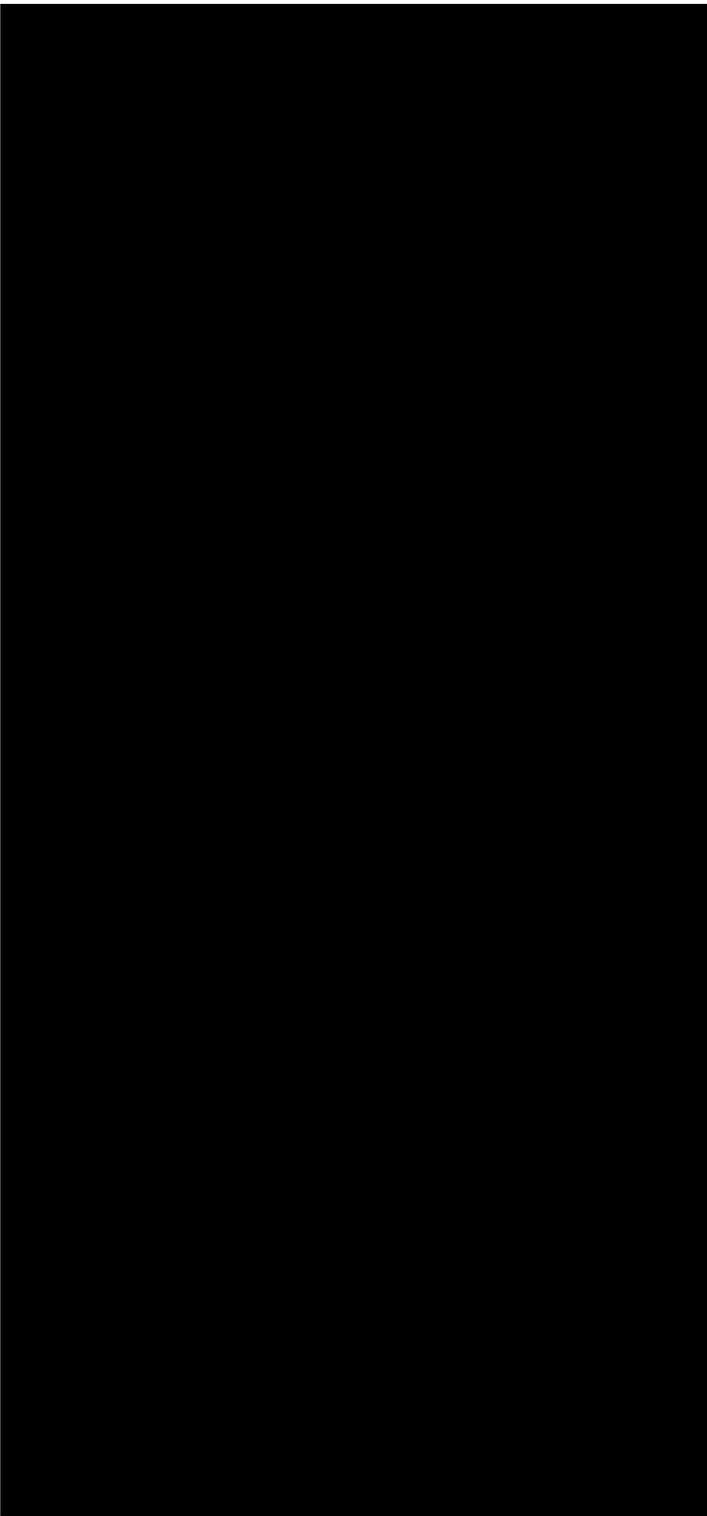
Potential for 'brain drain' from countries that may lose qualified optometrists to the UK, thus affecting eye care services in those countries.

The impact on the overall quality and diversity of the optometry workforce in the UK may benefit from international perspectives.

12 Is the proposed implementation date realistic (September 2026)?

Yes

Please provide further detail.:



[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

Yes

If yes, specify name of organisation:

Association of British Dispensing Opticians (ABDO)

4 Which category best describes you or the organisation you are responding on behalf of?

Optical professional/representative body

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

From experience in mapping overseas qualifications, [REDACTED] there is reasonable variation in the qualifications. I have not found one qualification that is comparable to the UK Level 6 dispensing qualification, in full. Generally, overseas dispensing qualifications generally focus on basic refraction and physics of cameras and photography, therefore the actual professional dispensing elements are not taught to the level required in the UK, and further training and assessments are required for applicants to go on the GOC register

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Negative

Please explain why.:

It has taken many years for the mappings undertaken in dispensing applications to align, with opinions on the level of evidence required, initially being quite different. I have great concern that if the responsibility lies with the providers there will be considerable variation in:

- the initial verification checks undertaken for each applicant (this could be a costly process for providers to implement the manpower), some providers will be more rigorous than others.
- there will be huge variation in the level of RPL that one provider may apply to another, the current process allows discussion between assessors to confirm which elements should receive RPL within an application, this professional discussion and agreement will be lost. Meaning some providers will be 'easier' to achieve RPL with than others.
- conversely, some applicants only really need to complete small elements on the UK syllabi to be deemed an equivalent standard in their training and experience, so expecting them to complete a 'standard' course to enter the register could be far more onerous than it needs to be.

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Yes

Please provide further detail.:

The existing GOC process maps the applicants previous studies to the core competencies, the new OfR are higher level and would not be a good indicator of the depth of knowledge. There is no reason the syllabus the applicant provides cannot be mapped to a selection of UK courses/syllabi as a more accurate indicator of the level to which an applicant has studied.

All of the 2023 courses (both ophthalmic dispensing and optometry) that have ben approved by the GOC would be eligible to be used within the mapping process, the UK syllabi that could be used for the mapping process could be from a provider in the area where the applicant is or intends to live, alongside another syllabus and both associated assessments to see if the overseas qualification would be deemed equivalent.

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

The process would safeguard the public ensuring the application process was rigorous consistent and fair

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

as point 5

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

No, as point 5

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Negative

Q9 - Current and prospective providers of approved qualifications:

Negative

Q9 - Placement providers:

Negative

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Q9 - Other (please specify below):

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

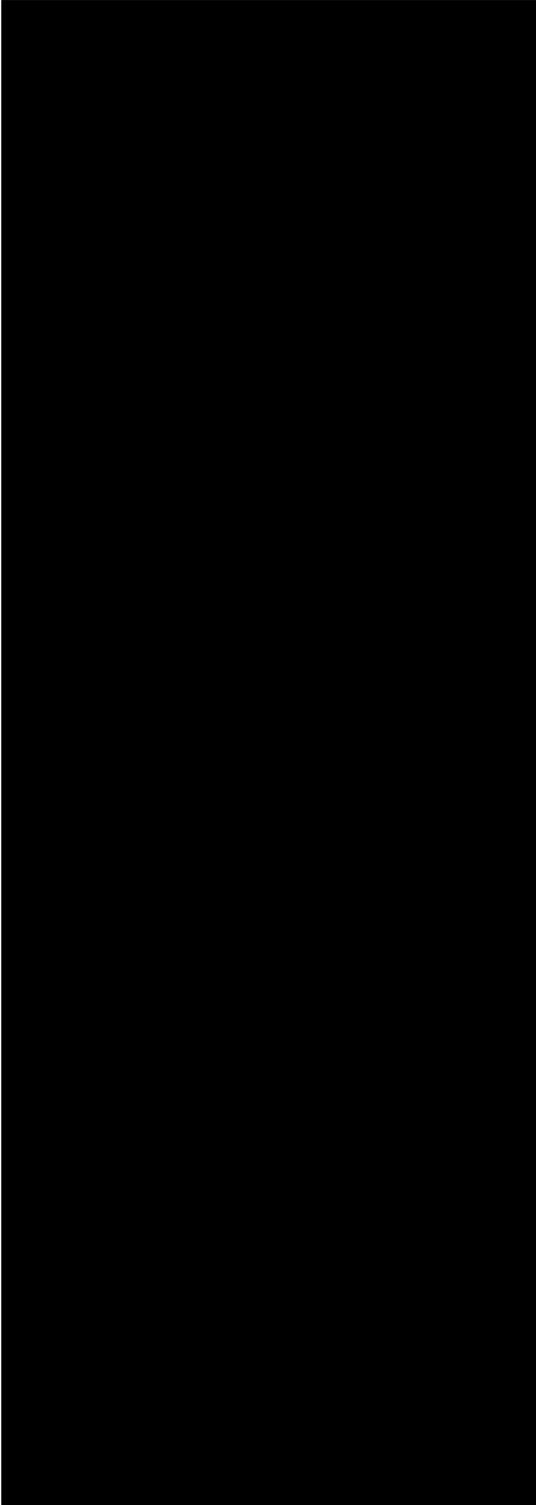
No

Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

Neutral

Please provide further detail.:



[REDACTED]

Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

[REDACTED]

## Introduction

1 What is your name?

Name:

[REDACTED]

2 What is your email address?

Email:

[REDACTED]

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Optometrist

If other, please specify:

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

I think that the current standards are ideal as in the UK the "ophthalmic opticians" were converted to "optometrists" due to the higher levels of training provided by the course and pre reg setting to help the work load for GPs. By changing this you are putting the public at risk for sub par treatment.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Negative

Please explain why.:

There is no shortage of optometrists in the UK there are more universities than ever churning out newly qualified optometrists. By not having the assessments you will be inviting sub par quality eye care into the country

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

Yes

Please provide further detail.:

Please carry out assessments like Australia and New Zealand who have managed to uphold the quality of eye care received by the public

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Negative

Please explain why.:

All applicants should be assessed the way IK qualified optometrists are why would you have alternative means and unfair methods of assessing?

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Direct application to the GOC only

Please explain why.:

The application procedure needs to be standardised across the board and the GOV is there to protect the public and should absolutely do so by not dropping the current standards of qualification required to practice in the UK

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Age, Disability, Gender Reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex, Sexual orientation

Please describe the impact on the individuals or groups that you have ticked.:

All individuals will be impacted as salaries will no longer be regulated as you will have an influx of optometrist from abroad. Completely causing an oversupply of optometrists. Cost of living is already high why would you want to reduce the salaries for optometrists?

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Negative

Q9 - Current and prospective providers of approved qualifications:

Negative

Q9 - Placement providers:

Negative

Q9 - Employers:

Negative

Q9 - Devolved Nations:

Negative

Q9 - Other (please specify below):

Negative

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

No

11 Are there other impacts (positive or negative) we should consider?

Yes

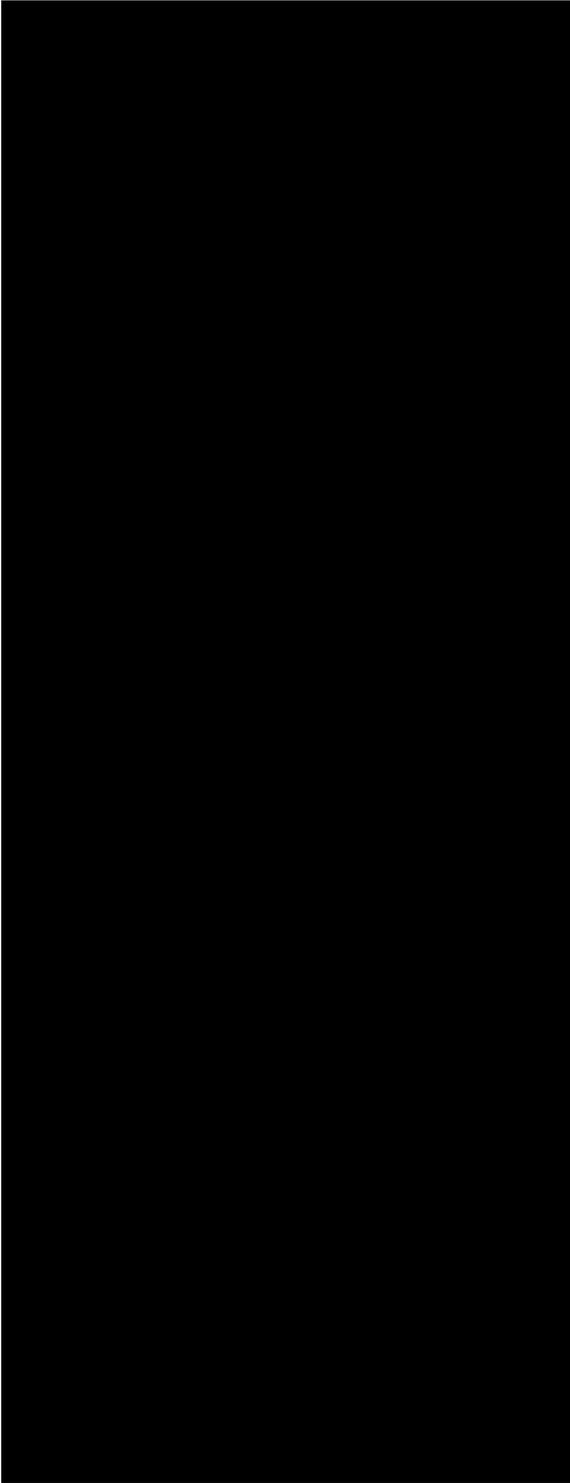
Please provide further detail.:

The impact on current optometrists in the uk needs to be considered but is not mentioned anywhere on your proposal.

12 Is the proposed implementation date realistic (September 2026)?

No

Please provide further detail.:



Submitted to Consultation on managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

## Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 Are you responding on behalf of an organisation?

No

If yes, specify name of organisation:

4 Which category best describes you or the organisation you are responding on behalf of?

Optometrist

If other, please specify:

Doctor of Optometry OD

## Consultation questions

1 Have you read 'The Proposal - International Registration Consultation and Impact Assessment' document before answering the following questions?

Yes

2 We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.

Please identify which qualifications may be comparable and explain why.:

Doctor of Optometry OD is internationally recognize degree in optometry which I would say must be recognize in UK.

3 Please consider proposals one and two described in section two of this consultation (paragraph 2.2 and below). Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

Positive

Please explain why.:

4 If your answer to the previous Question is 'negative', do you have an alternative proposal for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirements?

No

Please provide further detail.:

5 Please consider proposal three described in section two of this consultation (paragraph 2.2 and below). Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration')?

Positive

Please explain why.:

6 Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

Pre-assessed by a provider of the approved qualification only

Please explain why.:

7 We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

None of the above

Please describe the impact on the individuals or groups that you have ticked.:

8 We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

Don't know

Please describe the impact on the individuals or groups that you have ticked.:

9 How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Q9 - Applicants from optical professionals who have qualified outside the UK or Switzerland:

Positive

Q9 - Patients and the public:

Positive

Q9 - Current and prospective providers of approved qualifications:

Positive

Q9 - Placement providers:

Positive

Q9 - Employers:

Positive

Q9 - Devolved Nations:

Positive

Q9 - Other (please specify below):

Positive

Please specify 'other':

10 Have we identified and captured the impact accurately within the impact assessment (annex one)?

Yes

11 Are there other impacts (positive or negative) we should consider?

Not Answered

Please provide further detail.:

12 Is the proposed implementation date realistic (September 2026)?

Neutral

Please provide further detail.:

