General Optical Council

City, University of London
GOC FULL APPROVAL QUALITY ASSURANCE VISIT
PgCert in Therapeutic Prescribing
7 & 8 May 2024

Report confirmed by GOC	02 July 2024

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PART 1 – VISIT DETAILS

1.2 Programme details	
Programme title	PgCert in Therapeutic Prescribing
Programme description	- The University delivers the training element of the route to registration. The Therapeutic Prescribing programme at City is a distance learning Postgraduate Certificate (PgCert). Each module constitutes 15, level 7, academic credits and can be integrated into the MSc in Clinical Optometry offered by the university. - The modules of the programme are: - OVM050 'Principles of Therapeutics' (module 1) - OVM051/OVM058 'Principles of Prescribing' (module 2) - OVM053 'Independent Prescribing' (module 3). - In order to gain a qualification in Additional Supply (AS), modules OVM050 and OVM051 must be completed. - In order to gain a qualification in Independent Prescribing (IP), modules OVM050, OVM051/OVM058 and OVM053 must be completed. - All three modules have to be passed successfully prior to advancing to the clinical placement. - After successful completion of the IP programme, students are required to register with the College of Optometrists (CoO), complete a practical 'clinical' placement, submit a logbook and complete the Therapeutic Common Final Assessment (TCFA) to join the IP register.
Current approval status	Fully approved (FA)
Approved student numbers	N/A

1.3 GOC Education Visitor Panel (EVP)	
Chair	Will Naylor – Lay Chair member
Visitors	Jane Andrews – Lay member Nicola Szostek – Independent Prescribing/Optometrist member David Hill – Independent Prescribing/Optometrist member
GOC representative	Georgina Carter – Operations Manager – Education & CPD

1.4 Purpose of the visit	
Visit type	FULL APPROVAL QUALITY ASSURANCE VISIT

The purpose of this full approval quality assurance visit was to:

1. Review the City, University of London's (the University) PgCert in Therapeutic Prescribing programme (programme) to ensure it meets the requirements as listed in the GOC's *A Handbook for Optometry: Specialist Registration in Therapeutic Prescribing (2008)* (handbook) and the *GOC Education A&QA-Supplementary Document-List of Requirements (list of requirements)*.

This visit took place remotely.

1.5 Programme history		
Date	Event type	Overview
24/06/2019	Change	The GOC noted that the University would be offering the IP programme with online modules, in addition to face-to-face delivery.
16/03/2020	Other	The University notified the GOC that they were reviewing contingency plans for teaching and assessment following the COVID-19 pandemic.
27/08/2020	Change	The GOC noted that IP modules would be delivered online for 2020/21 academic year, as per university policy.
01/07/2021	Change	The GOC noted that IP modules would continue to be delivered in an online format.
15/12/2023	Administration	A full approval quality assurance visit was confirmed for 7 & 8 May 2024.

PART 2 – VISIT SUMMARY

2.1 Visit outcomes	
The panel set two new conditions, with two requirements deemed unmet, and offered one recommendation.	
Summary of recommendations to the GOC	
Previous conditions	All previous conditions are **MET.**
New conditions	Two requirements are deemed **UNMET** and **two** conditions are set. Details regarding the condition is set out in **Part 3.**
New recommendations	**One** recommendation is offered. Details regarding the recommendation are set out in **Part 3.**
Commendations	**No** commendations are offered.
Actual student numbers	2023/24: • OVM050 PRD1 2023/4 – 45 students • OVM050 PRD1 2023/4 – 43 students • OVM053 PRD3 2023/4 – 43 students
Next visit	By May 2029.
Factors to consider when scheduling next visit e.g. when students are in, hospital, audit etc.	The visit should be scheduled to factor in: • time to speak to students. • time to speak to external examiners. • the implementation of the GOC's new Education and Training Requirements (ETR).

2.2 Previous conditions		
The conditions listed below are extracted from the report of Click or tap to enter a date.		
Requirement number	**Condition number and description**	**Status**
N/A	The programme must assure that standard setting is adopted and the validity and reliability of the assessments is clearly documented (as per section 2.9 of the Handbook). Evidence of the standard setting policy must be provided to the GOC in documentary form.	This condition was deemed **MET** by the executive prior to this visit taking place and was not reviewed by the EVP at this visit.

2.3 Previous recommendations	
The recommendations listed below are extracted from the report of Click or tap to enter a date.	
Description	**Comments**
1. To provide the IP programme with a greater identity, through dedicated administration support, external	The panel were assured that the provider had taken on board comments surrounding administration support and examining arrangements. However, they identified that

examining arrangements and marketing.	the identity and marketing of the IP programme could be improved and have linked this recommendation to condition 1 set at this visit.
2. To consider the sequencing of the IP modules so as not to disadvantage some cohorts in time or learning opportunities.	The panel were assured that this recommendation had been addressed and sequencing of modules had been considered.
3. To clarify the programme structure for applicants and current students on the programme website and paper based related material.	The panel identified that further consideration can be given to this recommendation and link it to condition 1 set at this visit.
4. To undertake a review in order to enhance student support mechanisms in communication, feedback and registration.	The panel were assured that the provider had taken on board comments surrounding enhancing student support mechanisms in communication and registration. However, they continue to encourage the programme team to consider feedback mechanisms and link this recommendation to recommendation 1 set at this visit.
5. To undertake a review of the range of programme delivery methods in order to broaden and enrich multimedia learning opportunities.	The panel were assured that this recommendation had been addressed and a range of delivery methods had been considered.

2.4 Non-applicable requirements

The EVP recommends that some requirements be deemed fully or partially non-applicable to the programme at this stage due to its structure and level and the differing, but overlapping, roles and responsibilities of City, University of London and the College of Optometrists (CoO) for example:
- the University only provides the theory aspect of the route to registration.
- the CoO is responsible for the clinical placement and ensuring all the elements of portfolio are completed under supervision.
- the administration of the TCFA is the responsibility of the CoO.

Additionally, the EVP recommends that some requirements be deemed fully or partially non-applicable to the programme as:
- the programme has full approval.
- this is a Therapeutic Prescribing programme.
- the programme is set at postgraduate level.
- the programme does not have a cohort cap.
- the University does not have a commercial partner for this programme.

A1.3	Provisional approval must be in place prior to advertising the qualification and recruiting the first cohort of students.
A5.1	Student optometrists or dispensing opticians must always make sure a patient knows their student status.
A5.2	The award of qualifications using the protected title of optometrist and dispensing optician is limited to qualifications approved by the GOC as meeting the professional standards required.
A5.3	Students who gain sufficient academic credits to receive an award but do not meet the professional requirements must receive an alternative award

	to that approved by the GOC. The alternative award must not use the protected title of optometry/dispensing optician.
A6.3	Providers must inform the GOC of any planned or actual changes to the approved student intake numbers of more or less than 10% and provide a rationale to include plans to be put in place so that GOC standards and requirements will continue to be met.
IP2.1	Providers inform the GOC of any commercial sponsorship of the training programme.
IP3.2	Students must receive comprehensive clinical practice.
IP3.3	It will normally be for the student to arrange the clinical practice placement and the appropriate mentorship during the placement, and to inform the College of Optometrists (the College) (and the provider, as appropriate) of the details.
IP3.4	The clinical practice placement must normally be undertaken in the UK.
IP3.5	The clinical practice placement should be spent in a hospital eye service or specialist general practice under the supervision of a designated ophthalmologist, and provide the experience stated in the patient experience requirements.
IP3.6	Where there is an issue requiring resolution concerning the suitability of a practice placement, the issue and supporting evidence must be referred to the GOC for arbitration.
IP3.7	The student must make suitable arrangements for their mentorship.
IP3.8	The choice of mentor and the environment in which the mentorship will be delivered must be recorded by the College (and the provider, as appropriate).
IP3.9	The student must register with the College in advance of commencing their practice placement, providing details of the mentorship.
IP3.10	The designated mentor must provide supervision, support and appropriate clinical exposure so that the student can develop links between theory and practice.
IP3.11	The provider must ensure that the mentor is sufficiently familiar with the requirements of the training programme and the need to achieve the stated learning outcomes and competencies.
IP3.12	The PBL must ensure that the student is competent in the assessment, diagnosis and management of the ophthalmic conditions for which the optometrist intends to prescribe.
IP3.13	The PBL must ensure that the student is able to recognise those sight threatening conditions that should be referred.
IP3.14	The PBL must ensure that the student is able to consult effectively with patients.
IP3.15	The PBL must ensure that the student is able to monitor the response to treatment to review both the working and differential diagnosis, and to modify treatment or refer/consult/ seek guidance as appropriate.
IP3.16	The PBL must ensure that the student makes clinical decisions based on and with reference to the needs of the patient.
IP3.17	The PBL must ensure that the student critically analyses and evaluates his or her ongoing performance in relation to prescribing practice.
IP3.18	Students must have an understanding of their role as an independent prescriber, an awareness of the limitations of their clinical experience and demonstrate an ability to work within the limits of their professional competence.

IP3.19	Clinical training must be structured to ensure that each student is exposed to sufficient numbers of patients presenting with the conditions that he or she will manage therapeutically. In addition, the student must be exposed to a range of ophthalmic conditions so as to develop differential diagnostic skills.
IP3.20	Each student must maintain a log book of practice evidence to verify that learning outcomes and core competencies have been achieved.
IP3.21	The log book must contain details of all patients seen, signed off by the mentor, and an indication of the actual involvement of the student in each patient episode.
IP3.22	Full information regarding each patient's clinical presentation, management and follow-up must be provided.
IP3.23	A reading log of the literature that has been used by the student to inform his or her understanding of prescribing practice must be provided.
IP3.24	The log book must evidence that the student has critically reflected on his or her own performance and show evidence of personal and professional development.
IP3.25	A summary sheet showing where in the log book the evidence for the achievement of learning outcomes can be found must be provided.
IP3.26	The student's involvement in the patient care episodes described in the log book must be signed off by the supervising medical practitioner.
IP3.27	The log book must be submitted to the examiners prior to the final assessment.
IP4.1	The assessment provider must give students details of the format of the portfolio and the nature of the common final assessment for the programme.
IP4.3	There must be a formal assessment, carried out by the College or other GOC approved provider, in the form of the Therapeutic Common Final Assessment (TCFA) at the conclusion of the clinical placement.
IP6.1	Optometrists must successfully complete the Common Final Assessment of Competence.
IP7.3	Applicants must have identified a mentor prior to commencing the course.
IP7.6	In order to maintain currency of knowledge, no more than two years may elapse between the student's completion of the theoretical element of the programme and the commencement of their clinical placement.
IP7.7	No more than two years may elapse between the student's completion of the clinical placement and their taking the College's Therapeutic Final Common Assessment [TCFA] (or suitable and approved alternative).

PART 3 – CONDITIONS, RECOMMENDATIONS & COMMENDATIONS

Conditions are applied to training and assessment providers if there is evidence that the GOC requirements are not met.	
Recommendations indicate enhancements that can be made to a programme, these may not be directly linked to compliance with GOC requirements.	

3.1 Conditions set at this visit	
The unmet requirements for this visit are set out below along with the conditions that are required to meet the requirements.	
A1.2	The route to registration must be clearly communicated to prospective and current students.
Condition 1	The provider is required to submit evidence that they have clearly communicated the route to registration, and the providers involvement in it, to current and prospective students.
Date due	**Friday 31 August 2024.**
Rationale	The GOC recognises that to gain a qualification in Additional Supply (AS), students must complete modules OVM050 and OVM051. To gain a qualification in Independent Prescribing (IP), modules OVM050, OVM051/OVM058 and OVM053 must be completed. Students can complete these modules independently, or as part of the MSc in Clinical Optometry. Both are routes to registration on the GOC AS/SP/IP speciality register. All three modules must be passed successfully prior to advancing to the clinical placement.
	Conversations during the visit, and examination of both City's and CoO's websites, highlighted that prospective and current students were not always clear on what is required of them to complete the full route to registration.
	Through the pre-visit documentation and during the visit the panel heard that students must have commenced OMV050 to progress onto OMV051/OVM058 and OMV053, and completion of all three modules is required to progress onto the clinical placement. During the visit, the panel were informed that communication of the start date for each module was not always clear to prospective and current students. Considering the above, the panel believe that the start dates for each module should be communicated as far advance as possible. This is to ensure that prospective and current students have the information required to successfully complete the route to registration, at a pace suitable for them.
	The panel also heard that prospective students must contact the programme team to understand the programme structure and the role it plays in the route to registration, because some of this information is not available on the provider's website. To ensure that students have the information required to successfully complete the route to registration before enrolment, the panel believe that clearer information should be easily accessible without requiring students to contact the programme team.
	As such, the provider is required to submit evidence to demonstrate that the route to registration through the PG Cert (and not only when it is completed

	as part of the MSc programme), is more clearly communicated to prospective and current students. This condition is linked to aspects of recommendations 1 and 3 from the 2017 quality assurance visit.

IP4.8	Assessment mechanisms must be suitable for the understanding, knowledge, skills and competencies they are designed to test.
Condition 2	The provider is required to submit evidence to demonstrate that they have assessed the vulnerability of their assessment mechanisms to academic misconduct and the weaknesses that the assessment identifies.
Date due	**Friday 31 August 2024.**
Rationale	Through the pre-visit documentation, and from discussions during the visit, the panel noted that some of the assessments on the programme were taken under invigilated conditions on the provider's campus, while others were taken remotely without invigilation. The panel also noted that the provider had acknowledged the vulnerability of assessments, not completed under invigilation or proctoring, to the use of generative Artificial Intelligence and advised programme teams to identify higher-risk assessments and plans to mitigate those risks. During the visit the panel were informed that the at-home assessments that were not invigilated on the PG Cert had not been subject to the review recommended by the provider. As such, the provider is required to submit evidence that they have undertaken a thorough assessment of their assessment arrangements to consider their vulnerability to the use of generative AI and addressed the weaknesses that the assessment identifies.

3.2 Recommendations offered at this visit	
The EVP offers the following recommendations to the provider.	
IP5.1	Providers must have quality assurance information/handbooks which indicate the QA arrangements to audit the appropriateness of the learning/assessment environments and provide guidance to achieve the requirements of this handbook.
Recommendation 1	The panel recommends that the provider consider alternative ways to strengthen current and/or implement new, formal, and informal student feedback mechanisms.
Rationale	Through the pre-visit documentation and during the visit, the panel identified that the feedback from AS/IP students was limited. The panel recognises the difficulty with obtaining feedback from postgraduate students but recommend that the provider considers mechanisms that better suit the structure and nature of the postgraduate programme. This is to encourage higher volumes of feedback from students, to contribute to the continuous development of the programme. This is linked to recommendation 3 set at the 2017 quality assurance visit.

3.3 Commendations made at this visit

No commendations were made at this visit.