

## Therapeutics Common Final Assessment - Independent Prescribing Regulations

1. These are the regulations that govern the Therapeutics Common Final Assessment (TCFA) Independent Prescribing (IP) Exam.

### Definitions

2. The following definitions will apply to these regulations:

**“Allotted time”** means the maximum time allowed between successfully completing a specialist therapeutics programme and starting the clinical placement and/or completing the placement and taking the TCFA. This time is defined by the General Optical Council (GOC).

**“Candidate”** means someone who has entered for the TCFA.

**“Chair”** means the chair of the TCFA IP Prescribing Assessment Panel or the Appeals Review Panel of the College

**“Chief Executive”** means the Chief Executive of the College.

**“The College”** means the College of Optometrists.

**“Director of Education”** means the Director of the Education Department of the College of Optometrists or his or her nominee.

**“Deputy Director of Education”** means the Deputy Director of the Education Department of the College of Optometrists or his or her nominee.

**“Designated Ophthalmic Practitioner (DOP)”** means:

- IP qualified optometrist who has at least two years’ experience as an IP qualified optometrist, listed on the GOC register as such;
  - OR
- A GMC registered doctor currently engaged on, and at least two years into, an ophthalmic-specialty training programme, listed on the GMC register as such.

**“Mentor”** means a Designated Ophthalmic Practitioner currently engaged in supervision of an IP trainee.

**“Overall Review Mentor”** means the designated ophthalmologist responsible for the overall clinical placement and logbook sign-off for the IP trainee

**“Therapeutics Common Final Assessment”** (TCFA) means the assessment through which candidates demonstrate that they have the knowledge and skills necessary to be eligible for specialist registration with the GOC.

### Scope

3. These regulations apply from 1 July 2019.

### Entry requirements for the Therapeutics Common Final Assessment

4. Before a Candidate enters the TCFA he or she must have:

- a. been a registered optometrist (with the GOC) for at least two years
- b. successfully completed an appropriate specialist therapeutics programme recognised by the General Optical Council
- c. undertaken a clinical placement of a minimum of 24 sessions of not less than three hours (12 days) within two years of completing the specialist therapeutics programme.

Please note candidates must attempt the TCFA within two years of completing the clinical placement unless they meet the criteria for extending time as outlined in regulation 5.

## **Extending the Allotted Time allowed between completing the Independent Prescribing course and commencing the clinical placement or between completing the clinical placement and sitting the final Independent Prescribing examination**

5. It is possible to apply for an extension to the Allotted Time. Such extensions can only be granted as follows:
  - a. application to the College must be made following the process on the website, with an explanation of the extenuating circumstance and the time period affected. Circumstances can include, but are not restricted to difficulties obtaining appropriate placement experience, extended period of illness, extended period of family leave
  - b. the extension must be the same as the period of time affected, subject to a maximum of one year (in addition to the two years normally permitted)
  - c. Currency of knowledge relating to prescribing must be maintained during the entire period of the extension, such that 6 points of prescribing specialty domain are completed pro rata per year of extension. This must be evidenced and should be undertaken from six months before the expiry of the allotted time.

## **Registration with the GOC**

6. The Candidate must remain registered with the GOC throughout their programme of study and assessment.
7. The Candidate is eligible for specialist registration when the Candidate is awarded a Pass in the Therapeutics Common Final Assessment in Independent Prescribing. .

## **Language of Assessment**

8. All assessments will be carried out in English.

## **Reasonable Adjustments**

9. The College will make reasonable adjustments to the TCFA in accordance with section 20 of the Equality Act 2010 for any Candidate who has a health condition or impairment.
  10. Any candidate who has a health condition or impairment or who develops a health condition or impairment is to inform the College of their condition or impairment at the earliest opportunity in writing or by such means as may be appropriate.
  11. Where the College receives information (other than under Regulation 9) which indicates a candidate may have a health condition or impairment, the College may conduct such further enquiries as are reasonable and proportionate in order to establish whether the College has a duty in line with the Equality Act 2010.
  12. Any candidate who has a health condition or impairment and feels that the arrangements for the TCFA will cause them a substantial disadvantage as a result of their health condition or impairment may apply within a reasonable timeframe via the MyCollege area for reasonable adjustments to be made. The candidate must
    - a. provide evidence which includes recommendation from a relevant healthcare professional as to the nature of the adjustment(s) required
    - b. respond to requests for further information from the College
- Applications with complete evidence must be made at least six weeks in advance of the examination to ensure requests can be accommodated. Applicants will be notified as soon as possible of the outcome of their application.
13. The Deputy Director of Education shall notify the Candidate of their decision and reasons via the MyCollege area or by such other means as may be appropriate as soon as reasonably practicable.
  14. Any Candidate who is dissatisfied with the Deputy Director of Education's decision as notified under Regulation 13 may ask for the Appeals Panel to review the matter. Any request for a review should be made in writing or email or by such other means as may be appropriate as

soon as reasonably practicable. Any Appeal will be sent to the next Appeals Panel meeting as set out on the College website. Any response may take longer than six weeks.

15. Following receipt of a request for a review under Regulation 14
  - a. The Candidate shall have an opportunity to make further representations to the the Appeals Review Panel in person or by any other convenient means;
  - b. The Appeals Review Panel may request additional information from:
    - i. The candidate
    - ii. the candidates medical practitioner (providing the candidate has given consent
    - iii. any other person whom the panel at their absolute discretion considers appropriate. ; and
  - c. The Chair shall decide whether it is necessary for any reasonable adjustments to be made and, if so, what adjustments, if any, can reasonably be made.

17. The Chair shall notify the Candidate of their decision and reasons including details of what adjustments, if any, can reasonably be made in writing or by such other means as may be appropriate as soon as reasonably practicable.

18. Subject to compliance with the Equality Act, nothing in Regulations 9-18 above shall be read as implying that the College will allow any adjustment to the competence requirements of the Common Final Assessment in Therapeutics (Independent Prescribing) on the grounds of health condition or impairment. If the candidate believes that the standards are discriminatory then the matter will need to be referred to the GOC.

### **Cheating and Misconduct**

#### *In the Logbook*

19. For the purposes of these Regulations, “cheating” in the Logbook includes:

- a. Making false statements in the Logbook
- b. Copying, stealing, appropriation or use of the work of another as evidence for the Logbook
- c. Permitting or assisting another to copy or use one’s own work as evidence for their assessment.
- d. Using, attempting to use, assisting another to use or attempting to assist another to use any other unfair, improper or dishonest method to gain advantage in any part of the assessment process.

20. For the purposes of these Regulations, “misconduct” in relation to the Logbook includes writing in or attaching to any papers, or giving orally or electronically, any message or Appeal to Mentor or Designated Ophthalmic Practitioner (DOP) with the intention of influencing their decision.

21. Where College staff, mentor, DOP or other complainant suspects a Trainee of cheating or misconduct they should report the matter promptly to the Education Manager, Examinations copying in the Deputy Director of Education

22. For the purposes of these Regulations, “cheating” in the examination includes:

- a. Accessing forbidden written materials or webpages during the examination
- b. asking another person for the answer to an examination question
- c. Using, attempting to use, assisting another to use or attempting to assist another to use any other unfair, improper or dishonest method to gain advantage in any part of the assessment process.

23. For the purposes of these Regulations, “misconduct” in relation to the exam includes writing in or attaching to any papers, or giving orally or electronically, any message or appeal to the invigilator or College staff with the intention of influencing their decision.

24. Where College staff, third party invigilator, mentor, DOP or other complainant suspects a Trainee of cheating or misconduct they should report the matter promptly to the Education Manager- Examinations or the Deputy Director of Education

25. Upon receipt of an allegation of cheating or misconduct, the Deputy Director of Education or delegate will decide upon examination of the initial evidence whether the allegation should be investigated and, if so, what form the investigation should take.

26. The Education Manager, Examinations will write to the candidate, informing them that the allegation has been received and what will happen next, including (but not necessarily limited to):

Whether:

- a. the allegation will be investigated to obtain more details before it is referred to the Disciplinary Panel; or
- b. the allegation will be referred straight to the Disciplinary Panel with such details as are available; or
- c. no action will be taken by the College in relation to the allegation; and
- d. Requesting a written statement from the candidate of observations on the allegation.

27. If the Deputy Director of Education or Education Manager, Examinations decides that it is appropriate to investigate the allegation before it is referred to the Disciplinary Panel, the investigation will be carried out by the Education Manager, Examinations, or a nominee appointed by the College, and another qualified optometrist appointed by the College.

28. The investigation by the College will depend on the nature of the allegations raised.

- a. The investigation will include consideration of the candidate’s written observations and may include obtaining written and/or oral evidence from the complainant, the trainee, the practice, the mentor, and/or other persons and examine other evidence such as patient records and other written materials.
- b. If the candidate is interviewed by the investigators, the trainee may be accompanied by one other person.
- c. The length of the investigation will usually depend on the complexity and seriousness of the allegations. The investigation will be completed as efficiently as reasonably practicable. It is expected that it will normally be completed within 28 days of the letter being sent informing the candidate that an allegation has been made; however, it is recognised that this may not be possible in all cases. For the avoidance of doubt, the additional duration of an investigation over the 28-day period will not invalidate it in any way.
- d. Any results due to the candidate will be withheld by the College of Optometrists pending the outcome of the investigation.
- e. The College will make reasonable efforts to ensure the candidate is kept informed of progress. The complainant may also be kept informed, depending upon interest in the matter.

29. At the end of the investigation the details of the investigation, including the candidate's written observations on the findings and any recommendations of the investigators, will be referred to a meeting of the Disciplinary Panel. For the avoidance of doubt, the Disciplinary Panel members are not bound to follow the investigators' recommendations.

30. Upon receipt of details of a case, the Disciplinary Panel will meet in private to decide on the basis of the documents before it whether there is a case to answer.

- a. If they decide there is no case to answer, no further action will be taken by the College and any results will be processed and issued.
- b. If they decide there is a case to answer, but that the case is not of sufficient severity to be referred to the GOC for consideration under its Fitness to Practise procedures, the members of the Disciplinary Panel will require the candidate to be reassessed as they think fit.
- c. If they decide there is a case to answer of sufficient severity, the case will be referred to the GOC for consideration under its Fitness to Practise procedures and the members of the Disciplinary Panel will require the Candidate to be reassessed as they think fit, pending the outcome of the GOC's procedures. It is possible that the trainee will not be permitted to sit the TCFA (Independent Prescribing) until the outcome from the GOC is known.

31. The candidate will be informed in writing of the decision of the members of the Disciplinary Panel. The complainant may also be informed, depending upon his or her interest in the matter and at the discretion of the College.

32. A Candidate has a right to Appeal to the Appeals Review Panel if they disagree with the Disciplinary Panel's decision under Regulation 31. An additional fee will be payable for this as detailed in the Schedule of Fees. Applications for an Appeal to go to the Appeals Review Panel will only be considered in the following circumstances:

- a. if there is further evidence, not available at the time of the original Disciplinary Panel meeting; or
- b. if there is evidence that there was some irregularity in the Disciplinary Panel Process.

33. The application to the Appeals Review Panel should

- a. set out the grounds of Appeal; and
- b. Include any further supporting evidence.

34. The Appeals Review Panel will consider in private on the basis of the documents before it.

35. In considering an application or an appeal, the Appeals Review Panel may request additional information in writing from:

- a. The candidate ;
- b. The candidate's Mentor;
- c. The candidate's medical practitioner(s) (providing the candidate has given consent)
- d. Any other person whom the Appeals Review Panel at its absolute discretion considers appropriate.

This additional information will be shared with the candidate and the candidate will be given the opportunity to submit comments in writing on the information before the meeting.

36. The Appeals Review Panel has the right to:

- a. refuse an Appeal
- b. Uphold the decision of the disciplinary panel or select another option from those described in regulation 31.

37. The decision of the Appeals Review Panel is final.

#### *Cancellation*

38. A Candidate who wishes to cancel his or her place before the TCFA IP in which he or she has a place must do so seven days' in advance of the exam date. Failure to cancel with less than seven days' notice will result in the candidate being marked as a no show for the examination and they will need to apply and pay for a place in a subsequent TCFA IP.

39. A candidate who fails to complete the booking procedure 72 hours before the examination sitting with the third-party assessment supplier will be considered as a no-show and a cancellation will be processed. Failure to complete the booking procedure during the 72 hours preceding the examination will result in the candidate being marked as a no show for the examination and they will need to apply and pay for a place in a subsequent TCFA IP.

#### *Non Attendance*

40. For candidates who do not attend the TCFA IP in which they have a place and who have not cancelled their place in advance, their non-attendance will be recorded as a no show for the examination and they will need to apply and pay for a place in a subsequent TCFA IP. These fees will be in the Schedule of Fees in force at the time.

41. If candidates do not log into the online exam within the agreed window of time they will be marked as a no show for the examination and will have to they will need to apply and pay for a place in a subsequent TCFA.

42. Any fees due to the College will be in the Schedule of Fees in force at the time.

43. For candidates who can provide evidence of extenuating circumstances in relation to regulations 39-41 there will be no additional fee when they apply again.

44. Candidates who feel unwell during any section of the TCFA IP must inform the online Invigilator. Should the candidate choose to continue with the assessment he or she will be marked in the usual way. If the candidate does not attempt the assessment, then regulations 41 and 42 above apply.

#### *Adverse Circumstances which affect Conduct of the TCFA*

45. If any adverse circumstances affect the conduct of the TCFA for any candidates, the Invigilator representative at the TCFA will take such action as he or she thinks fit and will make a report to the Deputy Director of Education. After the Assessment the College will consider the effect of the circumstances and take any further action it thinks appropriate. Any circumstances and actions taken will be reported to the Independent Prescribing Assessment Panel.

### *Complaints*

46. Any candidate who wishes to complain about any aspect of the TCFA IP (other than applications made under Regulation 9 – reasonable adjustments) should submit a written report to the Education Manager, Examinations, via [exams@college-optometrists.org](mailto:exams@college-optometrists.org) within 28 days of the Final Assessment.

### *Appeals*

47. A candidate who reasonably believes that a procedural and/or administrative irregularity may have occurred in the TCFA IP may make an Appeal via the MyCollege area.

48. Any Appeal must be submitted within 28 days of the notification of the examination results, and must set out on what grounds Appeal is made. The Appeal fees must also be received by the College within this 28-day period.

49. The College will acknowledge receipt of the Appeal in writing within 5 working days.

50. An Appeal can only be made if the candidate reasonably believes that there were procedural or administrative irregularities or mistakes in the conduct of the examination, which were of such a nature as to cause reasonable doubt about whether the results would have been the same had the irregularities not occurred. An Appeal cannot be made against examiner judgment i.e. a candidate's unsubstantiated opinion that they have been marked harshly or incorrectly.

51. The fees for each Appeal are set out in the Schedule of Fees in force at the time. Payment must be made in sterling. Appeals will not be considered until payment has been cleared. The Education team will anonymise all Appeals.

52. In the first instance, the Appeal will be considered by the Appeals Panel. The Appeals Panel may request additional information from the examinations team. This additional information will be shared with the candidate and the candidate will be given the opportunity to comment on the information before the meeting.

53. The Appeals Panel will meet in private and decide on the basis of the documents before it whether to:

- a. uphold the Appeal, and allow a free resit if it believes from the evidence an irregularity or mistake has occurred;
- b. refuse the Appeal if it believes there is no evidence an irregularity or mistake has occurred;

54. In considering an application or an Appeal, the Appeals Review Panel may request additional information in writing from:

- a. The candidate ;
- b. The candidate's Mentor;
- c. The candidate's medical practitioner(s) (providing the candidate has given consent)
- d. The exams team;
- e. Any other person whom the Appeals Review Panel at its absolute discretion considers appropriate.

The College shall notify the Candidate of the Appeals Panel's decision in writing and by email within 5 working days of the meeting.

55. A Candidate has a right to appeal to the Appeals Review Panel if they disagree with the Appeals Panel's decision under Regulation 53 to refuse their application. An additional fee will be payable for this as detailed in the Schedule of Fees. Applications for an Appeal to go to the Appeals Review Panel will only be considered in the following circumstances:

- a. if there is further evidence, not available at the time of the original Appeals Panel meeting; or
- b. if there is evidence that there was some irregularity in the Appeals Panel Process.

56. The application to the Appeals Review Panel should

- a. set out the grounds of Appeal; and
- b. Include any further supporting evidence.

57. The Appeals Review Panel will consider in private on the basis of the documents before it.

This additional information will be shared with the candidate and the candidate will be given the opportunity to submit comments in writing on the information before the meeting

58. The Appeals Review Panel has the right to:

- a. refuse an Appeal
- b. Uphold the decision of the Appeals Panel, or overturn the decision and grant a free resit.

59. The Appeals Review Panel will meet in private and decide on the basis of the documents before it whether to:

- a. uphold the Appeal, and allow a free resit of the examination, if it believes from the evidence an irregularity or mistake has occurred;
- b. refuse the Appeal if it believes there is no evidence an irregularity or mistake has occurred;

60. The decision of the Appeals Review Panel is final with regard to Appeals.

Monitoring, review and evaluation arrangements

The College has put in place arrangements for the active monitoring, review and evaluation of the TCFA (IP) and emergent issues relating to candidates progression.