

Consultation Accreditation of Prior Learning (APL) policy

The College of Optometrists' response 6 September 2017

Your details

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Which category of respondent best describes you (please tick all relevant)?

- | | |
|---|---|
| <input type="checkbox"/> Member of the public | <input type="checkbox"/> Optical business |
| <input type="checkbox"/> Optometrist | <input type="checkbox"/> Education or training provider |
| <input type="checkbox"/> Dispensing optician | <input checked="" type="checkbox"/> Optical professional body |
| <input type="checkbox"/> Student – optometry | <input type="checkbox"/> Healthcare regulator |
| <input type="checkbox"/> Student – dispensing | <input type="checkbox"/> GOC member |
| <input type="checkbox"/> Other (please specify below) | |

If you are replying on behalf of an organisation

Name of the organisation: The College of Optometrists

Your position: Public Affairs Manager

Nature of the organisation's work: The College is the professional body for optometry. It qualifies the profession and delivers the guidance, development and training to ensure optometrists provide the best possible care.

I would like my responses to be attributed to the organisation's name.

Keeping in touch: We would like to contact you occasionally to let you know when we launch consultations. We will not pass your personal information on to any third party. Please tick here if you wish to be contacted in this way about the GOC's consultations:

Question 1. Do you support the GOC's approach in opening access to optical education through recognition of APL?

Yes No

Please give your reasons below:

We welcome the fact in paragraph 12 on page 4, the GOC notes that healthcare courses pose some problems when considering APL arrangements and that the regulator needs to be assured that if any APL arrangements are in place, then these do not have an impact on the outcomes of individual students. However, we would add that the most important issue for healthcare regulators, is that APL arrangements must not have an impact on the health of

future **patients**, in a situation where a student, whose prior learning has been accredited, has not had sufficient training or reached a high enough standard in a particular area.

While we welcome the intention of widening access to students with potential, we believe the safety of patients comes first and any APL arrangements must be tight enough to ensure this. We are concerned that paragraph 18 on page 6 puts too much emphasis on the impact on the types of students listed in that paragraph as opposed to the safety of patients. For example, we know that the GOC currently allows optometrists who have failed the Scheme for registration to start again but we question the wisdom of this, particularly if the profession of the future is going to take on more clinical responsibilities. Since this rule was first put in place, arrangements for students with exceptional circumstances have been put in place in the Scheme for registration to allow these students some flexibility, and they are allowed a defined number of attempts at each stage of the assessment process.

In terms of allowing wider access for students who have not had the opportunity to follow the conventional route but have the potential to train as optometrists, we believe there should be arrangements in place. However, we do not think that APL alone is the correct route, as these students may need extra training in certain subjects to have a solid foundation to take up optometry. It may be that an access course or a degree apprenticeship would be appropriate.

Question 2. Does the policy make it clear what the GOC expects of education providers in relation to APL?

Yes No

Please give your reasons below:

The guidance is very high level and open to interpretation. While all GOC approved training providers are different, and this will determine the parts of their courses for which students' prior learning can be accredited, it would be helpful if there were a consistent approach to how equivalence is mapped. We wonder if this could be tackled jointly by the optometry schools so they could reach some agreement on equivalence. This would mean that two students who had done a first year at University A, one of whom was going on to University B and one of whom was going on to University C could be sure that what they had done was viewed in the same way at both these institutions, even though the design of the courses at these institutions might mean they were exempt from different amounts of training.

In terms of optical related professions, our comments above about widening access apply.

In terms of those doing degrees in other relevant health care disciplines, we wonder if a similar approach to mapping equivalence to the one outlined for GOC approved training providers could be taken.

In terms of accrediting the prior learning of those trained outside the UK, if there is not sufficient evidence to make APL arrangements with education or training providers outside the UK, how can GOC approved training providers assure themselves of the quality of the training that individuals have undertaken, and how can they protect themselves from allegations of discrimination from those who are turned down?

Question 3. Are the registration requirements for postgraduate students enrolled on courses involving patient interaction clearly outlined in the policy?

Yes No

Please give your reasons below:

APL for courses that are academic in nature are for the university to make. The protection of patients is dealt with through the requirements for GOC registration and supervision.

Question 4. Is the policy presented in a way that is clear, accessible and easy to use?

Yes No

Please give your reasons below:

It is too high level and does not deal adequately with the protection of patients, or issues of transparency or consistency.

Question 5. Is there anything missing, incorrect or unclear in the policy?

Yes No

Please give your reasons below:

Please see our answer to question 4 above. It does not give sufficient detail to ensure transparency and fairness for students or protection for patients. Students are beginning, in some institutions, to see patients earlier in their courses, and this is likely to become more common. It may also expose some providers to allegations of discrimination.

While, we do not see it as the GOC's role to impose detailed arrangements for APL, we believe there could be more guidance in principle on what is expected and encouragement for providers to work together to ensure consistency.

Question 6. Are there any specific issues or barriers that could prevent stakeholders from implementing or complying with the policy?

Yes No

Please give your reasons below:

Without more detail of what is expected, stakeholders may implement the policy inconsistently.

Question 7. What action could the GOC (or other organisations) take to help education providers implement the APL policy?

With more guidance from the GOC in terms of principles, providers could work together to ensure a consistent approach that also allows for differences in course design.

Question 8. Are there any aspects of the policy that could have an adverse or negative impact on certain groups of patients, optometrists, dispensing opticians, optical students, optical businesses, optical training institutions or any other groups?

Yes No

Please give your reasons below:

There is a danger of a lack of clarity and transparency, which could cause potential students to be, or perceive themselves to be, discriminated against. Training institutions could inadvertently find themselves subject to allegations of discrimination.

Question 9. Are there any areas of the policy that could discriminate against stakeholders with protected characteristics?

Please consider sex, age, race, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, caring responsibilities or any other characteristics.

Yes No

Please give your reasons below:

In relation to considering applications from outside the UK, in particular, applicants might feel that they have been discriminated against in relation to race, unless the policy for considering applications is transparent and consistent.

Question 10. Do you have any additional comments you wish to make on the policy?

Yes No