

University of Portsmouth
GOC Approval Visit
Master of Optometry (MOptom)
27-29 November 2019
(3 days)

Date report completed	12 December 2019
Report confirmed by GOC	17 January 2020

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## PART 1 - VISIT DETAILS

1.2 PROGRAMME DETAILS	
Programme title	Master of Optometry (MOptom) (the 'Programme')
Programme type	Master/MOptom
Current approval status	Provisional Approval
Approved/current student numbers	16 maximum per cohort

1.3 GOC EDUCATION V	1.3 GOC EDUCATION VISITOR PANEL	
Chair	Jane Andrews, Lay Chair	
Visitors	Markham May, Lay and Educationalist Navneet Gupta, Optometrist Richard Allen, Optometrist Graeme Stevenson, Dispensing Optician Nick Wilson-Holt, Ophthalmologist	
GOC representative	Lisa Venables, Education Manager	
Observers	None	

#### 1.4. PURPOSE OF THE VISIT

#### Visit type | Approval Visit

This visit forms part of an annual cycle of visits for programmes under provisional approval. It is to ensure that the Programme has been developed, implemented and delivered to the relevant standards in accordance with the GOC Handbook: Accreditation and Quality Assurance Handbook: Routes to Registration in Optometry.

The Education Visitor Panel (the Panel) will consider the progress made in relation to both the serious concerns review (SCR) and any outstanding conditions, as well as evaluating whether students have reached the expected level of knowledge and competence (in relation to the point at which they are on the Programme).

In identifying unmet requirements, the Panel is asked to consider the level of risk associated with each requirement.

1.5 PROGRAME HISTORY			
Set out a chronology of the key events affecting the programme in the last FIVE years,			
including any visits and key events.			
Date	e Event type Overview		
02/02/2016	Visit	Feb 2016 – Initial approval visit conducted. 11 conditions set	
	with a revisit required in order to check progress before		
		provisional approval (PA) could be recommended.	
23/06/2016	Visit	June 2016 – Follow-up approval visit found 8 of 11 conditions	
		met. Based on a proposal by the University, the Panel	
		recommended 5 new conditions and that PA would only be	

		recommended on the proviso further documentary evidence is submitted.
26/07/2016	Other	Documentary evidence was submitted, and PA granted by Council
27/03/2017	Visit	March 2017 – Part 1 of the year one approval visit takes place and focuses on meeting students and conducting lesson observations.
02/05/2017	Visit	May 2017 – Part 2 of the approval visit takes place to conclude the review
28/02/2018	Visit	Feb 2018 – Year two approval visit takes place, which raises some concerns about the programme.
01/08/2018	Event	Aug 2018 – SCR launched by the GOC.
04/12/2018	Visit	Dec 2018 – Year three approval visit takes place, is not concluded until February 2019 following receipt of further documentation. Panel notes good progress and recruitment of a senior lead leading to fulfilment of long-standing condition 1. A further visit in Autumn 2019 is required for Year 4 approval.

### PART 2 - VISIT SUMMARY

#### 2.1 Visit outcomes

The November 2019 Panel comprised both registrant and lay members who had undertaken previous Panel visits to the University of Portsmouth's (UoP) Programme, and those who had not. The Panel adopted the standard GOC approach of considering the Programme provision against all the GOC requirements in turn. The Panel identified 16 unmet GOC requirements. Of these requirements, the Panel deemed 13 as requiring immediate rectification, and therefore the setting of a condition to be achieved at a future date was inappropriate. A majority of the unmet requirements were driven by the issues of:

- an absence of a sufficient complement of full-time academic staff,
- accurate up-to-date course materials not being available for all three current years,
- students not having accurate timetables for lectures and exams,
- a lack of teaching modules, and
- the absence of assessments addressing the deficiencies identified by the external examiners.

The Panel considered that these matters were built on unresolved conditions from previous Panel visits, were of fundamental significance, and would take time to resolve.

Based on the evidence reviewed, including mitigating plans put forward by UoP, and triangulation of evidence, the Panel were not assured that UoP would be able to continue delivering the Programme adequately and to the standards set by the GOC.

In that light, the Panel are unable to recommend that provisional approval continues - and therefore recommend that the GOC withdraws provisional approval. Should the GOC choose to withdraw provisional approval, the Panel recommends that the University should take every effort to support students in securing a transfer to an alternative accredited provider and that it is essential that students be given the option to transfer to BSc, BSc (Hons) or Masters programmes in accordance with their own preference with immediate effect. The nature of the transfer varies for each cohort and is set out in Annex 1.

In considering five scenarios presented by the University, the Panel recommend that the GOC approve a BSc Optometry for the current level 7 (year 4) students who have achieved a 2:2, should they wish to exit the programme and continue on the scheme for registration (SfR). For clarity, the Panel does not recommend that approval continues for students to complete any further education or training at this institution.

Summary of recommendations to the GOC		
Previous conditions – met/not met	3 met, 3 unmet.	
New conditions	16 unmet requirements	
New recommendations	None	
Student numbers	<ul> <li>Maximum 16 per cohort</li> <li>Year 1 – intake suspended by GOC in September 2019</li> <li>Year 2 – 11 students</li> <li>Year 3 – 11 students</li> <li>Year 4 – 11 students</li> </ul>	
Next visit	Upon instruction from the GOC	

	revious conditions		0040	
Ref	conditions listed below are extracted from the repo	Requirement	er 2018 <b>Due</b>	Met?
No.		number	date	
4	The University must ensure that eye clinic supervisors receive comprehensive guidance and training enabling them to fully understand their responsibilities and obligations.	OP3.6	31 July 2019	⊠ Yes □ No
5	<ul> <li>The student logbook must contain a record of both patient experience and achievement of all core competency providing: <ul> <li>evidence of how and when each individual element of competence was achieved by the individual student;</li> <li>a case record completed by the student for each individual patient episode contributing to the minimum requirements;</li> <li>evidence of development of the students professional judgment through critical thinking and reflection in relation to supervisor feedback following patient episodes.</li> </ul> </li> <li>Please note: All parts of this condition need to</li> </ul>	OP6.10	31 July 2019	⊠ Yes □ No
	be met, partial meeting of this condition will be considered as 'not met'.			
6	Methods of assessment relating to core competencies must be in line with current practice and quality assured.	OP4.2	31 July 2019	□ Yes ⊠ No
9	Copies of completed course materials for level 7 must be submitted to the GOC and these materials must be quality assured by the External Reviewer prior to submission.	OP5.6	31 July 2019	□ Yes ⊠ No
MC 1	Exam Papers must be compiled and checked by staff with the requisite skills and knowledge and a clear internal process for final approval of these exam papers must be in place.	OP4.4	31 July 2019	□ Yes ⊠ No
MC 2	A report providing evidence that the actions outlined in the action plan submitted to the GOC in December 2018 (in relation to the external review) have been completed.	OP5.2	29 March 2019	⊠ Yes □ No

2.3 Previous recommendations  The recommendations listed below are extracted from the report of 04 December 2018			
Description	Comments		
The student voice would be enhanced through a student representative for each year group in the programme.	Each year group had a representative.		
The recording of the dispensing patient episodes in the logbook should be aligned with the spectacle dispensing experience in the handbook.	The Panel viewed the logbook, which was much improved, and did not note any concerns.		
The team should consider creating a more comprehensive work book for contact lens practical lab sessions.	No update provided.		
The interim measures (relating to Condition 1a and b of the June 2016 report) that are currently in place are maintained to provide transitional support to the new senior member of staff.	UoP advised that this arrangement was still in place, however, the Panel only found evidence of support given by the External Reviewer, not the External consultant.		
The external examiners remain in post to provide consistency and support to the programme.	Both External Examiners were still in post.		

#### 2.4 Conditions set at this visit

Conditions are applied to training and assessment providers if there is evidence that the GOC requirements are not met.

The conditions (unmet requirements) for this visit are set out at 3. below.

#### 2.5 Recommendations made at this visit

The Panel offers the following recommendation(s) to the provider. Recommendations indicate enhancements that can be made to a programme but are not directly linked to compliance with GOC requirements.

Ref. De	Description
Ref No	None

# **PART 3 – CONDITIONS**

GOC REQUI	DEMENT
OP1.2	The route to registration structure, content and learning outcomes must be designed to teach and assess the understanding, knowledge and skills contained within the GOC core competency and patient experience requirements.
Date Due	The very significant amount of remedial work needed, the lack of immediately available expertise, and the students being mid-course, meant that the Panel concluded that setting a condition to be met at a future date was not appropriate.
Rationale	During the visit, the Panel observed lessons, reviewed External Examiners and External Reviewer's reports, gathered feedback from staff and students (via online survey and in person), and read documents submitted by UoP and via meetings during the visit.
	At the start of the visit, UoP's senior management team were forthcoming with the Panel and advised that in light of recent staff resignations, the development and delivery of the Programme had been left in a precarious situation. This included incomplete Level 7 materials, including the module content and assessment materials, unwritten exams and assessments for all years and gaps in teaching due to staff absences.
	During the visit, senior management presented a number of proposals in which to mitigate the loss of these posts:  1. Senior Lecturer – an agreement with an existing GOC approved university (university 1) in which a member of staff would be seconded to UoP in a 1FTE capacity on a 1 or 2 year FTC.  This agreement had been discussed with university 1 but not formally agreed. During the visit the Panel were initially informed that university 1 had identified a member of staff willing to move to Portsmouth to fulfil this role and was awaiting the go ahead from UoP. However, it later became clear this this was not the case and that university 1 had merely been amenable to the idea stating that they would ask the staff if they would be interested. Advertising the vacancy was likely to be required.
	<ol> <li>The writing of the level 6 exams would be outsourced to a second existing GOC approved university (university 2). This would allow the remaining staff members to concentrate on the delivery of teaching rather than spreading their time writing examinations and assessments (further commentary on this in section OP4.5).</li> <li>The delivery of Level 7 modules to be outsourced to a third existing GOC approved university (university 3). As per point 2, this would ensure that Level 7 students receive the required number of credits to meet Level 7 and thus graduate with a Masters. On day one of the visit, UoP expressed the intention to 'buy in' the two modules required to achieve the academic credits, but on the second day they said that they were minded to reduce the cost and 'buy in' one, leaving the second module to be developed and delivered by their remaining academic staff.</li> </ol>

The Panel concluded that proposal (1) would not guarantee sufficient mitigation in a timely manner. The Panel spoke with representatives from university 2 regarding proposal (2), however was concerned that the quality of, or lack of, teaching that Level 6 students had received, would not prepare them well enough even if rigorous assessments were provided by university 2. In respect of proposal (3), the Panel spoke to the representative at the university 3 regarding the arrangement. The representative informed the Panel that discussions had taken place regarding the possibility of purchasing Level 7 materials, however university 3 have offered to deliver UoP students a one-off short course of 2x 30 credit modules. This would entail the students visiting university 3 once a week and UoP would be responsible for covering all financial aspects.

At the time of the visit, this agreement had been informally agreed and it was achievable for university 3 to put this together in time for the start of the next semester (27 Jan 2020). The team had budgeted for 12 students and could deliver the course using substantive contributions and visiting lecturers. A majority of content for these modules are online, with face to face teaching taking place every Monday.

Providing students pass the full 60 credits, UoP would then APEL the university 3 credits into their course allowing students to graduate with a UoP degree, provided they had satisfactorily completed their research project and the Scheme for Registration (SFR) (all assessments associated with the Preregistration).

It was university 3's expectation that UoP would conduct a mapping exercise to ensure all relevant areas were covered. University 3 would not be awarding any certificates or qualifications, only credits.

Should they fail, students would still have the opportunity to resit modules in June if necessary. University 3 would allow two further attempts in line with their own regulations, but that would be at the instruction of UoP.

University 3 highlighted that whilst they had paperwork ready and prepared, they were awaiting formal communication in order to proceed. To meet the January 2020 start, they would need this to be agreed by 13 December 2019.

The Panel heard that a curriculum review of the whole optometry programme had taken place. Staff reported that they were concerned that these changes had resulted in all of the optometry-specific material being covered across fewer modules / credits in order to accommodate other material in the remaining credits and raised concerns with senior management that the new curriculum did not adequately cover optometry content. The staff felt that these concerns were not heeded. Students reported that the shared modules lacked direct relevance to optometry and were insufficiently contextualised. The Panel found no evidence of the handling of this concern or that it had been satisfactorily resolved.

The Panel observed each of the lectures that took place throughout the visit, one was a Level 5 Lecture, the other Level 6. Overall, the Panel found

the lectures appeared to lack planning and structure and were missing a clear scheme of learning.

The Panel found the Level 5 lecture materials to be of good quality and the lecture itself to be satisfactory, whilst requiring some areas for improvement. Learning outcomes had been identified but they were not conveyed to the students, resulting in a lack of clarity around what they could expect to cover in the lecture. The lecture was attended by approximately half of the cohort.

The Level 6 lecture had been entered onto the timetable late and as such the Panel had been unaware that it was being delivered. It appeared that the later lecture observed by the Panel was a repeat of the lecture delivered earlier that day. The students politely reminded the lecturer that they had already covered this material in the earlier lecture. Despite that, the lecturer continued to cover the material for the benefit of the few students that had not attended the initial lecture that day before moving onto the second lecture material.

The lecture did not follow a clear lesson plan, the lecture appeared rushed and was not delivered well, with very little student interaction and explanation of core concepts.

The External Reviewer informed the Panel that the Level 7 materials had been received but were incomplete. Feedback was given on the material received and some were updated by the team but the content was still not complete at the time of the visit.

The Panel noted that whilst assessment materials existed, the External Examiners and the External Reviewer had identified a number of deficiencies. The Panel found little evidence to demonstrate that the suggested improvements had been made.

The Panel noted positively the eye clinic's organisation and equipment, as well as methods of student supervision and assessment. However, the overall Programme's academic teaching and assessment was providing incomplete content, consistency and rigour, and lacked an appropriate structure and scheme of work.

GOC REQUIREMENT	
OP2.2Req	The programme team must consist of a sufficient number and an appropriate
Ref. e.g	range of staff with the necessary skills, knowledge and experience to deliver
OP1.3	the programme effectively and support the student capacity.
Date Due	The very significant amount of remedial work needed, the lack of immediately available expertise, and the students being mid-course, meant that the Panel concluded that setting a condition to be met at a future date was not appropriate.
Rationale	The Panel deemed this requirement to be unmet because the Programme lacked the capable optometric and academic leadership required to deliver the Programme in the immediate future, following the imminent significant

reduction in staff. Timetabling, organisational skills and curriculum planning were absent. A significant amount of work was well overdue to bring module materials up-to-date for each cohort, severely outweighing the available capacity of the remaining staff.

The Panel noted that the External Examiners advice had not been addressed, and a review of the marking of exams revealed issues with the accuracy of consistently marking against the marking scheme.

The optometry qualified/registered staffing requirement leading up to the visit was at 4.0FTE. Meeting this number of qualified and registered staff has been an ongoing unmet requirement since the inception of the Programme with previous visits resulting in conditions in this area being set.

The Panel noted that the Programme has always been led by inexperienced academic staff, whom UoP stated at Panel visits in 2016, would undergo intense teaching and leadership training. Staff informed the Panel that this training did not take place.

In the weeks leading up to the visit, four key members of the team had tendered their resignations which would soon bring the qualified optometry staff total down to 1.2FTE. It is important to note that one of the resignations is the current course lead and another of the resignations is the Reader/senior academic appointment that was made in February 2019.

A number of staff informed the Panel that they had raised numerous concerns over an extended period with senior management regarding the lack of staffing, heavy workloads and the impact of staff sickness on the Programme. They had also raised concerns about the quality and viability of the Programme for some time. They said that they have been told that on the contrary, the Programme was not understaffed, their workloads were manageable, and therefore staffing levels did not need to increase. Concerns about the quality of the Programme were not heeded.

The Panel noted the comments and concerns raised by all staff during the visit. Evidence of training of clinical staff had been available before and throughout the visit, however, little evidence outside of staff testimonies was provided to demonstrate that all academic staff had received the training mentioned by the University.

The Panel surmised that the lack of staff coupled with a lack of, or deficient, training and support for inexperienced academics had resulted in an absence of curriculum planning and inefficient management of the Programme (lack of reviews, low quality exam papers, inability to respond to external parties).

While the student cohort remained small, the Panel were not assured by the proposed mitigations. None of the mitigations had been formally agreed or could be implemented with retrospective or even immediate effect. The remaining member of full time staff would not be able to adequately develop and deliver all the missing aspects the Programme until such time as these

posts are filled, even with the level of support from other providers that was discussed with the Panel.

GOC REQUII	GOC REQUIREMENT	
OP2.4	The adequacy of both the number and range of staff must be justified in the context of the mode of delivery.	
Date Due	The Panel considered that the lack of staff from December 2019 made it impossible to set a condition around the rationale for the number and range of staff in the context of the mode of delivery.	
Rationale	As per, OP2.2  The Panel noted that there had been a continuing lack of staff with the range of skills required, and the four main lecturers were leaving or reducing their hours significantly. The Panel were not assured that the remaining staff in place would be able to adequately, develop, manage and deliver the programme regardless of the small cohort size.	

GOC REQUIREMENT	
OP2.5 & OP2.6	2.5: The balance of full time, part time, hourly paid, technical and administrative staff must be supported by a clear rationale.
	2.6: The role and contribution of individual members of staff to programme delivery must be determined on the basis of their expertise and experience.
Date Due	2.5: The lack of staff immediately going forward meant that it was not appropriate for the Panel to set a condition around the rationale for the balance between different types of staff.
	2.6: This requirement was not suitable for a condition to be set as staff would need to be in place now, not in the future
Rationale	The Panel deemed these two requirements to be unmet for similar reasons based on the documentation provided and from meetings and observations conducted during the visit.
	From the documentation provided to the Panel prior to and during the visit, the Panel identified that the ratio of visiting staff versus those contracted to the Programme was imbalanced. The University explained during the visit that the rationale for this was due to crisis management which meant that they were in a position to accept any available staff at short notice. The Panel noted the circumstances in which this ratio was based but noted that this would not be typical of a fully staffed programme and that this rationale was as a result of resignations from a large proportion of the full time programme team.
	CVs of some proposed new staff were made available to the Panel. The Panel had some concerns that CVs indicated a lack of academic experience, risking continued inability to produce high quality lectures, materials, examinations and assessments. This would be further impacted by the lack of academic and technical leadership for the Programme.

Feedback from the students and observations of the remaining full-time lecturer further suggested to the Panel a lack of teaching expertise, including a lack of structure and planning as well as inappropriate delivery. Students expressed concern that lectures were not informative, and that the lecturer was not able to provide insight and support to students regarding the subject matter. Level 7 students had not received any technical content in the first semester of this year, despite exams expected early in 2020.

This requirement would need to be filled immediately in order to assure the Panel that it could be met; whilst there was a mitigation plan for staffing, the Panel noted that this would take some time to implement and were not assured that this could be achieved soon enough to resolve the issues outstanding.

GOC REQUII	REMENT
OP2.8	The programme must be led by a full time GOC-registered optometrist (preferably professorial level).
Date Due	Whilst there was a mitigation plan for staffing, the Panel noted that this would take some time to implement. Based on the problems faced by UoP in the past in filling this position, the critical need for leadership, and no immediate succession being in place, this requirement is not suitable for a condition to be set.
Rationale	This has been a long-standing GOC condition for this Programme, which was put in place to ensure the Programme had adequate leadership, optometric insight and academic experience. As the Programme is still new and developing, it requires heavy input to ensure that materials, exams and assessments are created to the right standard. Furthermore those members of staff with less academic experience could be supported in their development.
	This condition had previously been deemed met when the University advised the GOC that they had filled the Programme/Senior Lead in the shape of a Reader in February 2019. However, after some months, it became unclear as to whether that appointee was leading the Programme as the GOC came to learn that this individual had reduced her teaching hours to 0.2FTE and taken on a research focussed role with little teaching and leadership.
	Mitigating controls were still in place in the way of the external consultant, and these controls were required to continue as per recommendation of the previous GOC visit. This was to provide leadership, technical support and advice to the team and the new lead during the transitional period, as well as an External Reviewer to review all materials and content before being delivered. Evidence of the former was not identified by the Panel.
	The Panel viewed the External Reviewer's reports and whilst this control was definitely in place, it was found to be ineffective. The materials were received very late from UoP, and were incomplete, leaving the Reviewer unable to comment in some areas, and where changes were advised, there was little time left to make the changes.

In addition to the above, the Course Lead had resigned and was due to
leave his post two working days after the Panel's visit and the Reader had
reduced her hours to 0.2 (and who has now also resigned), leaving the
Programme without leadership.

GOC REQUIREMENT	
OP2.9	There must be a minimum of four full time GOC-registered optometrists in post to include the leadership post.
Date Due	The requirement cannot be met in an acceptable timeframe, and therefore the Panel concluded that this was not suitable for a condition to be set.
Rationale	As per OP2.2 and OP2.8  This requirement would need to be filled immediately in order to assure the Panel that it could be met. Whilst there was a mitigation plan for staffing, the Panel noted that this would take some time to implement and were not assured that this could be achieved soon enough to resolve the issues outstanding.

GOC REQUII	GOC REQUIREMENT	
OP2.10	An effective monitoring system must be in place to check the quality and management of resources and their capacity to ensure that standards are maintained.	
Date Due	The significant amount of remedial work needed, and the lack of immediately available expertise, meant that the Panel concluded that a condition with a future due date was not appropriate.	
Rationale	Based on the documentation provided and the meetings conducted throughout the visit, the Panel found that there are monitoring systems in place, however they have not been effective.	
	The Programme uses an External Reviewer to review materials and content prior to delivery. Whilst the External Reviewer has had sight of, reviewed and provided feedback regarding an incomplete set of the materials, the Panel found little evidence that feedback influenced the final product.	
	The Panel spoke to both External Examiners who both reported frustrations around the handling of examinations. They reported that there was little communication from UoP which resulted in not knowing when to expect receiving the papers. Timetables were rarely kept to, and when the examiners chased the team they found it hard to find the right person to contact and did not receive prompt responses.	
	The Panel viewed the External Examiners' reports in which both highlighted major areas requiring changes or improvement. Whilst the Panel also viewed responses from UoP, these were merely acknowledgements and did not address the areas requiring improvement. EEs expressed concerns that in some cases, their advice and amendments to exams were not always implemented, which indicated a failure of the QA mechanisms.	

Level 5 students reported to the Panel that since September they had not
received accurate timetables and teaching had been minimal, having
reported their concerns to UoP, they were frustrated that they had not seen
any improvement or guidance. The Panel also noted a disconnect between
the staff and the senior management regarding the staff resource which
appears to have contributed to inefficient management of timetabling.
The Panel concluded that an <i>effective</i> monitoring system was not in place to
ensure standards were maintained. The External Examiner External

The Panel concluded that an *effective* monitoring system was not in place to ensure standards were maintained. The External Examiner, External Reviewer and GOC recommendations had not been translated into the delivery of improvements.

GOC REQUIREMENT	
OP2.11	The supervisory structure, lines of authority and responsibilities of staff members must be clearly outlined.
Date Due	This was not available to the Panel to reflect the position from the following week (after the course leader has departed). Had this been the only requirement not met, the Panel would have been minded to set a condition that the requirement be addressed within a week of this report's issue.
Rationale	The Panel did not see clear documentation or feedback outlining the staffing structure. Meetings with the staff indicated a lack of clarity around who was leading the programme as of 2 December 2019 and the senior management team did not make it clear how this would be structured following the exit of the four key members of staff.

GOC REQUI	REMENT
OP4.2	Assessment methods must be in line with current practice and routinely monitored, quality assured and developed.
Date Due	The significant amount of remedial work needed, and the lack of immediately available expertise, meant that the Panel concluded that a condition with a future due date was not appropriate.
Rationale	As part of the documentation for this visit, the Panel reviewed External Examiner reports, exam board and unit assessment board minutes and completed exam scripts. The Panel also spoke to the External Examiners, External Reviewer and staff responsible for writing and setting assessments.
	The Panel found that assessment and examination methods were not well monitored or quality assured. Whilst there is a process in place in which to quality assure the exams and assessments, these processes were not being followed or not effective.
	The Examiners reported that they received papers very late leaving little time to provide feedback to the team in order for them to make the necessary changes. The examiners found the exams to be poorly written and in previous cases had provided substantial feedback and support in order to raise the exams to an acceptable standard.
	Responses to the Examiners' reports appeared to be acknowledgements rather than in-depth explanations of what changes had been made.

Examiners attending the exam board also felt their views were not listened to which may have resulted in simple errors with exam questions.

Further discussions with the Examiners highlighted that they had consistently raised concerns with the team regarding the quality of the exams since the inception of the course, but their feedback and concerns had been rebuffed or ignored and the issues raised were left unremedied.

The independent reviewer who conducted the External Review of the examining process was not given a comprehensive scope of review which resulted in feedback that was minimal or not relevant.

While the assessment methods were quality assured, the advice of the external examiners was not translated into the delivery of improvements. The Panel noted that the External Reviewer received incomplete material to review, and therefore the conclusions drawn were necessarily incomplete.

GOC REQUII	
OP4.5	The assessment structure and procedures must comprise formative and summative elements and provide the student with sufficient feedback, within a reasonable timeframe, to enable maximum learning and achievement.
Date Due	The significant amount of remedial work needed, and the lack of immediately available expertise, meant that the Panel concluded that a condition with a future date for delivery was not appropriate.
Rationale	The Panel reviewed documentation, spoke to senior management, teaching staff, students and External Examiners. The Panel found a lack of assessment structure, and were informed by the staff and senior management that examinations for this year's Level 6 students due to take place in January 2020 had not yet been written.
	While the assessment methods were quality assured, the advice of the External Examiners was not translated into the delivery of improvements. The Panel noted that the External Reviewer received incomplete material to review, and therefore the conclusions drawn were necessarily incomplete.
	Year 2/Level 5 students informed the Panel that they had received no guidance or direction since starting the September 2019 semester. There were a handful of students who reported experiencing particular issues with the Optics module from level 4. These students had not passed the Level 4 module in year 1, but due to the suspension of student intake into Year 1/Level 4 and a lack of staff, they were now being taught this trailing module by a physics lecturer whom they regarded as unable to provide them with the optical support and optometric context to help them to pass the module. These students reported experiencing much distress and confusion. They had not been told when the resit exams would take place, and any dates that had been given out previously were then postponed. Some students were clearly struggling and experiencing emotional distress and said that they were receiving little or no support from UoP.

Students also reported frustration over how they were taught Optics, considering that there had been a huge variance between two tutors which further contributed to their lack of success in the Optics resits. UoP had investigated this variance and concluded that the students had been taught two different techniques with the same results, and a senior physics lecturer was now running special sessions to assist students' Optics learning.

Programme staff and senior management informed the Panel that examinations for all levels had not yet been written. This was due to a lack of staff and staff absence over the previous months. Taking into account the resignations of four key programme staff, the senior management team began putting a mitigation plan into place. This involved paying for colleagues at university 2 to write examinations. At the time of the visit, this plan had been agreed in principle but not formally agreed.

The Panel spoke to a representative at the university 2 who confirmed that he had been asked to write the exams, and was willing to do so in his own time to support UoP. This task would likely take him a number of weeks to complete, and would then be subject to the UoP's own internal QA mechanism (e.g. to be reviewed by the External Examiners and to go through the UoP Exam Board). Therefore, in order to have the papers ready in time to be sat towards the end of January 2020, this would need to be fully agreed and the details drawn up by mid-December 2019 at the latest.

GOC REQUII	GOC REQUIREMENT	
OP5.2	The views of external stakeholders must inform the future development of programme design, content and delivery.	
Date Due	The Panel concluded that this requirement could not be remedied by the setting of a condition to be achieved at a future date.	
Rationale	The Panel viewed a vast amount of documentation including correspondence with the GOC, External Examiners and External Reviewer.  The External Reviewer expressed concern regarding the quality of the materials, as well as the structure of the credits for each unit/module which was not proportionate to the amount of contact/study time available to the	
	students. The External Reviewer also cited concern regarding the wellbeing of the staff, and deduced that they may not have capacity to cope with the workload. In addition, it was noted that they may have required more support in the development of their academic duties.	
	Based on the documentation seen, the Panel noted that concerns and issues had been consistently expressed by these external bodies, and UoP had consistently dismissed these concerns, or taken insufficient action to address them. This has been evident throughout the GOC involvement with UoP and had been reflected in the repeated conditions set at each Panel visit.	
	There was no evidence identified of the advice of the External Examiners or the GOC informing future developments, except with regard to the eye clinic.	

The Panel were given no such assurance that this requirement would be met
in the immediate future.

GOC REQUII	REMENT
OP5.5	The provider must ensure that the external examiners are, within a reasonable timeframe, provided with a response to their reports, detailing any actions to be taken.
Date Due	The Panel concluded that, considered in isolation, the failure to meet this requirement could have been remedied with the setting of a condition to provide a full response to external examiners indicating the action taken to address the deficiencies identified within a month for the current and all future reports.
Rationale	See 4.2.  The Panel found a lack of responses to the External Examiners, and responses that had been provided were merely acknowledgements or an explanation of how UoP disagreed with the feedback. There appeared to be little to no evidence of resolutions being put into place. The responses to the External Examiners did not detail the action undertaken and therefore the difference/impact of their recommendations was not evident.

GOC REQUII	REMENT
OP5.6	The provider must have an effective mechanism to enable the monitoring and evaluation of assessments to ensure appropriate standards are maintained.
Date Due	The significant amount of remedial work needed, and the lack of immediately available expertise, meant that the Panel concluded that a condition with a future deadline for action was not appropriate.
Rationale	See 2.10
	As per 2.10, UoP has a mechanism in place to monitor assessments to ensure they are appropriate. However, the Panel found the mechanisms to be ineffective and to have made no impact on improving the quality of the Programme.
	This is particularly pertinent in the feedback from the GOC, the External Examiners and the External Reviewer, where the Panel found little or no evidence of attempt to heed advice.
	The mechanism was plainly not effective from the GOC's perspective as appropriate standards were not being maintained in assessments. The Panel were not assured that this could be resolved within the time available.

GOC REQUII	REMENT
OP5.10	The provider must have an effective mechanism to identify risks to the quality of the education and training provided and to identify areas requiring development.

Date Due	The significant amount of remedial work needed, and the lack of immediately available expertise, meant that the Panel concluded that a condition with a future deadline for action was not appropriate.
Rationale	As per OP2.10 and OP5.6.  In addition to the rationale given for OP2.10 and OP5.6, the Panel found inadequate evidence of self-reflection or analysis (e.g. annual review). Any concerns or issues identified have been highlighted by external parties rather than by UoP itself and despite repeated warning, were not rectified.  The Panel were not able to identify a mechanism being used to identify risks to quality, and identify areas requiring development. Any identification by the Programme Team of risks to the quality of education and training had not led to the delivery of an improvement in the Programme, which appeared to the Panel to have declined considerably over the current semester. External stakeholder recommendations had not been implemented. Risks such as shared modules limiting the time available for optometric content had not been resolved.

GOC REQUII	REMENT
OP5.11	The provider must maintain effective governance arrangements to support relationships with any external parties responsible for delivering elements of the route to registration, specifically including practice-based learning.
Date Due	The Panel considered that, had they not been recommending course closure, this requirement could have been met by the setting of a condition to share a clear and agreed process with all parties within a month.
Rationale	The Panel spoke to UoP staff involved in the arrangement of both hospital and Pre-Registration Placements and spoke to employers offering Pre-Registration Placements (the Providers). The Panel also spoke to students making arrangements for their own placements.
	The Providers found it difficult to identify a point of contact with UoP that was familiar with pre-registration placements, and found the information given to be incomplete, incorrect, confusing or untimely. Providers reported that UoP's approach to communication was having an adverse effect on the incoming pre-registration students, who were experiencing a significant amount of stress caused by uncertainty of information provided by UoP.
	Placement staff for UoP informed the Panel that whilst UoP set up introductory meetings with potential Providers, it was the students' responsibility to secure their pre-registration placement.
	Inconsistent views were expressed to the Panel by the different parties regarding whether Providers were required to have contracts in place with UoP, and how the scheme operated.
	Level 5 students understood that they would only be able to secure placements with certain Providers who held contracts with UoP, resulting in a small number of students still without secure placements.
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UoP and some of the Providers were not aware that such contracts were in place. The result of the confusion and mixed messages left students very concerned.

The Panel concluded that different placement providers, students, and UoP's placement organiser had differing views on the arrangements on how the placement arrangement system worked.

The External Examiners reported difficulty in identifying the correct point of contact, and to obtain the documents required in good time. This also applied to the External Reviewer who had difficulty obtaining all the documents required to undertake a thorough review.

Feedback from the representative at Southampton Hospital, regarding the hospital experience for Level 6 students, indicated a similar experience, in that communications with UoP were minimal and often last minute. Group placements in a hospital setting were difficult to organise due to the busy nature of the department, meaning late organisation has an impact on when the hospital would be able to accommodate students.

Students attending previous placements with the hospital seemed to display confusion over the placement's purpose, believing that they would be receiving teaching. However, the main purpose was to allow students to observe different pathologies and scenarios in a hospital setting. The representative felt that that this could have been addressed with a clearer briefing by UoP to better manage student expectations.

The representative reported that there had been no communication or discussion around the placement for the current level 6 students which ordinarily would take place in January 2020. At this point in time, the hospital would not be able to accommodate students until March 2020.

ANNEX 1	
	Exit Award
	During the visit, the university stated their desire to be able to award a BSc alternative to the Masters degree.
	The University suggested that it might be possible for the GOC to approve their award of a BSc Optometry, rather than a degree in Vision Science. The Panel said that the GOC would require an application in writing to the GOC executive before such an unusual request could be considered. The Faculty indicated that such a letter would be despatched imminently. This request was predominantly borne out of feedback from, and concern for, students.
	The Panel had already concluded, for the reasons given in Part 3 of this report, that the Programme provision no longer met the GOC's requirements and therefore formed its own view of what it would recommend to the GOC executive if such a request was received from UoP. The recommendations in this area were dependant upon the stage of the programme at which the students had reached.
	Year 2/ Level 5 students:

Level 5 students have completed one year of the course with minimal content at level 5. Therefore, all of these students should be offered the opportunity to transfer to an equivalent stage of another accredited programme. It may be necessary to conduct an assessment to identify any missing elements from levels 4 and 5 or to facilitate the new provider in applying its APL/RPL policy.

#### Year 3/Level 6 students:

Based on the evidence set out in Part 3 of this report, the Panel had serious concerns about the completeness of education and knowledge at this level, despite demonstrating good quality clinical and communication skills. The GOC would need further assurance that these students have adequately completed **all** Level 6 aspects (including Patient episodes, core competencies and assessments and project work if to be an Honours degree).

The Panel noted that exams composed by university 2 to be sat in January 2020, may inadvertently disadvantage these students as they will not have had adequate time to prepare and exams may cover content they have been inadequately taught.

#### Year 4/Level 7 students:

In considering that the major issues with the Programme had a profound adverse effect from August/September 2019, the Panel agreed that level 7 students had completed the scheme of study to Level 6 while the GOC's provisional approval for the Programme was in place (although subject to previous Panel recommendations). Level 7 had therefore previously received all of the necessary learning and training to serve as an equivalent to a BSc in Optometry earlier in 2019 and before entering their preregistration placements (March 2019).

The students themselves noted that there had been a dramatic change for the worst after their third year, and so it was the past semester that had been adversely impacted. The College of Optometrists and placement providers noted that as a cohort undertaking their Pre-registration Year, their performance was on a par with cohorts from other providers.

The Panel concluded that, if the GOC agree to the Panel's recommendation to withdraw Programme approval and in the light of that exceptional circumstance, the Panel recommend that the approval of a BSc programme should be accepted for the current level 7 students only.

It should be noted that a minority of the Level 7 students are strongly of the view that they must pursue a Masters. The Panel therefore consider it essential that any award of a BSc is not at the cost of preventing such students being placed on another Masters Programme.

In summary, the Panel concluded that it would recommend to the GOC Council that Provisional Approval of the MOptom programme at UoP be withdrawn. As the Programme will no longer have provisional approval, it would be impossible for any students to continue to study for an award in optometry at UoP. All current students will need to be transferred to other programmes at other providers.

It will be a matter for all students, at all levels, to consider whether they wish to pursue a BSc or Masters with another provider. It was clear from talking to students in each cohort, that there was a split between those two options. The Panel consider it vital that the student's own views are taken into account and reviewed on a case-by-case basis when supporting them on the way forward.

ANNEX 2	
	University's scenario proposals
	Prior to the visit, the university put forward a number of scenarios for
	the GOC to consider.
	The Faculty had set out a number of scenarios that it wished the Panel to consider, ranging from allowing the Programme to continue through to full, immediate closure. They set out how they were planning to recruit staff, which when in post would develop and deliver the course material, as well as their plans to obtain support from other providers in order to achieve their preferred scenario. They provided helpful information to set out the maturity of their different recruitment plans, and links with other providers. The Panel also spoke to those providers. Over the three days of the Panel's visit, the Faculty's own plans matured from initially planning to buy two modules from university 3, to planning to buy one module.
	The Panel noted that previous Panel visits had also been assured of staff recruitment, which had not in the event delivered the desired outcome.
	While the Panel commended the recent work to address the loss of full-time lecturers and the absence of course material, improved assessments and timetabling, the Panel considered that the proposed mitigations would take too long to deliver the significant level of change needed for the current students.