

Within this Impact Assessment, we identify some of the key factors which may arise from the Education Strategic Review (ESR)'s draft Education Standards for providers and Learning Outcomes for students, for consideration.

We seek the views of our stakeholders to contribute to our current assessment, which will be further developed and published when complete. We will review and update our impact assessment as the project continues.

Education Strategic Review Impact Assessment

Step 1: Scoping the IA

Name of the policy/function:	Education Strategic Review – Education Standards for providers and Learning Outcomes for students
Assessor:	Head of Education
Version number	0.4
Date IA started:	10 October 2018
Date IA completed:	In progress
Date of next IA review:	March 2019
Purpose of IA:	To set out the key impacts for the sector and for providers in introducing new Education Standards and Learning Outcomes
Approver:	Director of Education
Date approved:	6 November 2018

Q1. About the policy or project

Aims: The aim of the new Education Standards and Learning Outcomes is to give more flexibility to education providers to deliver programmes leading to GOC registration, while taking into account the need for a greater focus on clinical and professional training, and the reality of increased multi-disciplinary work.

Purpose and Outcome:

The purpose of the ESR is to ensure that the standards of optical education are fit for purpose as the sector continues to evolve and to provide a robust approach to approval and quality assurance.

Key themes that have emerged from the ESR Concepts and Principles consultation were that:

1. Student practitioners need earlier, more varied and regular experience of engaging with patients;
2. We should focus more on evaluating the outcomes of education providers rather than detailed inputs, such as how programmes should be delivered;

3. Newly qualified professionals need to be able to make clinical decisions confidently and safely in the context of changing partner needs;
4. Newly qualified professionals need to be equipped to deliver new, different and innovative services,
5. We need to have a consistent, fair and proportionate approach to our regulatory processes for approving and quality assuring education that leads to registration with us.

The proposed Education Standards and Learning Outcomes have been drafted to incorporate feedback from the previous consultation on ESR Concepts and Principles. There are five proposed Standards covering areas including quality of learning, patient safety and access to clinical experience.

The draft Learning Outcomes would replace the current core competencies that all students are required to complete before they join the register as a qualified optical professional. The proposed Outcomes cover technical skills and also the 'softer' skills required to become a professional. For independent prescribers, it is proposed that the GOC adopts the Royal Pharmaceutical Society Competency Framework for all Prescribers.

Who will benefit: Public; students; current and new providers.

Q2. Gathering the evidence, stakeholder involvement and consultation

Available evidence used to scope and identify impact of the policy or project:

Research and consultation:

- Call for evidence (report June 2017)
- Research to learn from other professions/overseas (November 2017)
- System leaders roundtable (November 2017)
- Consultation on Concepts/Principles (report April 2018)
- Research with newly-qualified registrants/employers (June 2018)
- Development of Standards/Learning Outcomes with committees, Expert Advisory Group and other external stakeholder groups (Summer 2018)
- Education Provider Forum (October 2018)
- Consultation on draft Education Standards and Learning Outcomes (November 2018 – February 2019)

Q3. Activities or areas of risk or impact of the policy or project

For note: the left-hand column identifies some of the key factors or aspects of the ESR for consideration.

When considering the activities and aspects of the ESR set out below, respondents may wish to reflect upon the benefits, challenges and mitigating actions for any negative impact(s) identified, focussing on the topics most relevant to them.

Activity/Aspect of the ESR	Identification of potential impacts; evidence gaps; and mitigating actions
<p>1) Operational:</p> <ul style="list-style-type: none"> a) Education Standards for providers applying to the <u>whole</u> route to registration (we envisage that this will lead to more partnership-based delivery) b) Providers and the GOC managing the transition – with dual-running of approaches and resource requirements to ensure successful transition c) Separation or integration of academic and professional qualification(s) 	<p>Respondents may wish to explore the operational aspects identified and additional operational aspects for consideration.</p> <p>For example, with regard to the transition from the current Education Standards and Core Competencies to the proposed Education Standards and Learning Outcomes, we anticipate that transition will involve dual-running of both systems. Mitigating actions could include:</p> <ul style="list-style-type: none"> ○ agreed individual implementation plans between GOC and providers to allow appropriate time for internal business cases, validation processes and programme development to be completed with the resource available; ○ pre-prepared communications by the GOC for senior stakeholders and for teaching staff at providers; ○ a dedicated GOC point of contact; and ○ staggered roll out with a final date whereby all providers will operate under the new Education Standards and Learning Outcomes.

Activity/Aspect of the ESR	Identification of potential impacts; evidence gaps; and mitigating actions
<p>2) Regulatory:</p> <ul style="list-style-type: none"> a) Ensuring consistency in the 'end point' professional level (quality of graduates eligible to join the register) b) Transition from a prescriptive regulatory approach to a non-prescriptive approach (which may include sector-led benchmarking) and the potential requirements for a Standards evaluation framework to supplement the Standards c) Consistency with Continuing Education and Training (CET) standards and application d) Shift in focus for regulation (risk-based, proportionate) and to minimise duplication of other regulators' activity 	<p>Respondents may wish to explore:</p> <ul style="list-style-type: none"> • the benefits and constraints of a common national exam and consider whether this aligns with the principles of the ESR; • potential ways to achieve consistency in Learning Outcomes without a common national exam or objective structured clinical examination (OSCE); • the benefits and constraints of sector-led benchmarking and any specific areas/topics that the sector would want to see included (for example, rules around supervision, minimum patient episodes, etc.); • the benefits and constraints of a GOC Standards evaluation framework to supplement the Standards whilst remaining non-prescriptive, i.e. how to ensure that GOC guidance does not become a standard; • potential areas for which the GOC could adopt a more light-touch approach, as it is within another regulator's remit; and • the potential roll-out plan and its alignment with CET learning outcomes.
<p>3) Political:</p> <ul style="list-style-type: none"> a) Four nation divergence in healthcare/ changing scopes of practice and the extent of prescribing in undergraduate courses b) Focus on new training pathways (including apprenticeships and degree apprenticeships) c) Unknown potential impacts of Brexit 	<p>Respondents may wish to explore:</p> <ul style="list-style-type: none"> • the impact of the Education Standards and Learning Outcomes on post-graduate education, including consideration of divergence of healthcare across the four nations; and • the opportunities and risks presented by apprenticeship and degree apprenticeships, and the alignment of these training pathways with the intended outcomes of the ESR.

Activity/Aspect of the ESR	Identification of potential impacts; evidence gaps; and mitigating actions
<p>4) Economical:</p> <ul style="list-style-type: none"> a) Placement costs and implications b) Sustainability of optical educator vs. commercial sector salaries c) Funding 	<p>Respondents may wish to explore:</p> <ul style="list-style-type: none"> • the challenges and potential solutions to placement costs; • the challenges and opportunities to attract suitably qualified optical professionals to deliver high quality education; • the funding implications for students, providers, placements or others; and • potential implications for providers and optical education should student fees decrease, and what appropriate regulation may look like in this scenario.
<p>5) Social/Cultural:</p> <ul style="list-style-type: none"> a) Desire to promote a culture of lifelong learning and reflective practice b) Embedding a professionalism mindset (not just clinical) c) Potential to introduce a mandatory requirement that all experienced fully-qualified registrants have supervision responsibilities d) Mindset of 'traditional' route to registration models which may limit achievement of the desired outcomes 	<p>Respondents may wish to explore:</p> <ul style="list-style-type: none"> • the opportunities to promote cultural change in the sector to one of lifelong learning and reflective practice, develop the role of supervision in practice, and the probability that the ESR will positively impact optical education and cultural change; • the balance of professionalism and clinical skills within education currently and after the introduction of the Education Standards and Learning Outcomes; • the barriers that fixed mindsets regarding the traditional route to registration models may present in achieving the desired outcomes of the ESR; and • the impact of potential variation in course duration arising from different routes to registration, especially on students.
<p>6) Technological:</p> <ul style="list-style-type: none"> a) Keeping up to date with technological developments and changing regulation of technology b) Different ways of learning using technology & the additional training required for staff 	<p>Respondents may wish to explore:</p> <ul style="list-style-type: none"> • the challenges and opportunities brought about by changing technology in optical education, and the GOC's role in this.

Activity/Aspect of the ESR	Identification of potential impacts; evidence gaps; and mitigating actions
<p>7) Legal:</p> <p>a) Equality, diversity and inclusion responsibilities</p>	<p>Respondents may wish to explore:</p> <ul style="list-style-type: none"> • the benefits and challenges that the Education Standards may present for equality and diversity issues. For example: <ul style="list-style-type: none"> ○ Benefits could include: <ul style="list-style-type: none"> ▪ prospective students being assessed for their ability to complete the full route to registration, rather than solely on the academic element, may have a positive impact for individuals with disabilities; ▪ differing entry routes may widen participation and diversify registrant demographics and backgrounds; and/or ▪ a focus on professionalism may have a positive impact on customer service and patient care. ○ Challenges could include: <ul style="list-style-type: none"> ▪ it could be more difficult to ensure consistency in the application of a non-prescriptive approach; and/or ▪ ownership for the application of reasonable adjustments would need to be managed across partnerships.
<p>8) Environmental:</p> <p>a) Earlier practice-based learning availability, suitability and sustainability of placements</p> <p>b) Changing learning environments – face to face, virtual learning environments (VLEs), webinars</p> <p>c) Practice-based learning environments – hospitals, independent, multiples, domiciliary</p>	<p>Respondents may wish to explore:</p> <ul style="list-style-type: none"> • the benefits and challenges of changing learning environments to quality of education, staffing requirements and achievement of Learning Outcomes; • the benefits and challenges of ensuring students experience a wide variety of different practice-based learning across different regions; and • the benefits, challenges and ways to manage earlier practice-based learning.

Step 3: Monitoring and review

Q5. What monitoring mechanisms are or will be in place to assess the actual impact of the policy?

The initial impacts of the ESR are expected to come to fruition in 2025. This will be measured through, for example:

- Implementation timescales and data;
- Repeat consultations and surveys: newly qualified and employers; providers; representative and membership bodies; and
- Risk reviews.

Next review date: March 2019