



To: Institute for Apprenticeships and Technical Education and Trailblazer Group

Sent via email: Healthcare.Trailblazer@skillsforhealth.org.uk

24 November 2021

Re: Optometry standard and end-point assessment consultation

On 4 November 2021, the Institute for Apprenticeships and Technical Education (the Institute) launched a consultation on its optometry standard and end-point assessment EPA documents. The consultation closed in less than two weeks, and unfortunately, this did not allow us sufficient time to consult members and the wider sector. We were, therefore, unable to submit a response to the formal consultation as the Institute could not offer an extension due to its internal deadlines.

We are now writing to share our feedback in this short letter and welcome a meeting with other sector partners to discuss the standard, EPA, and next steps.

Feedback

In 2019/20, we responded to the initial optometry apprenticeship consultation. In that response, we shared member feedback and our analysis of the proposal – including areas of confusion and concern and where clarity would add value ([here for ease of reference](#)).

We note the November 2021 standard and EPA documents are now more precise in terms of an explicit reference to the General Optical Council (GOC) – i.e., that the entire apprenticeship model is dependent on approval by the GOC and ongoing compliance with GOC outcomes, standards, and quality assurance (QA) requirements. This could be made more explicit but is a welcome improvement.

We also welcome the confirmation that the EPA period should only be arranged once the employer and GOC Approved Education Provider is satisfied that the apprentice is consistently working at or above the level set out in the occupational standard. Also, all the pre-requisite gateway requirements for EPA have been met, and the GOC will quality assure the EPA process.

Unfortunately, however, the lack of supporting information, still leaves room for doubts about the detail of what is being proposed in the standard and EPA documentation. For example, how this will map to the GOC outcomes and the indicative curriculum content guidance being developed by the sector under the leadership of SPOKE (within the College of Optometrists).

This might help explain why member feedback and queries we have received to date focus on the lack of detail and how this is creating mistrust and confusion. Many point out that the standard and EPA documentation do not provide:

- Sufficient detail about the module content of the apprenticeship, the range and format of assessments and when they will be carried out
- Clarity about how a student reaches/demonstrates the Miller's triangle criteria of knowing, showing, and doing
- Reassurance about the independence of assessments and how any conflicts of interests will be managed
- Confidence that this path to registration will be equivalent to traditional qualification routes
- Sufficient detail to ascertain whether this route to qualification is likely to put patients at risk
- Information about how and whether the EPA maps to all GOC requirements
- Clarity about the balance between academic and practice-based learning and how the elements will be combined
- Assurance about whether it is feasible for an apprentice to qualify within 48 months given that it already takes this length of time to qualify through full-time study.

Members also raised concerns about transparency and process, including questions about who is on the Trailblazer Group and why.

In response to this feedback, we have investigated in more detail and understand that:

- The GOC must approve any course and content and would only do so if patient safety was not at risk and GOC outcomes were achieved
- Employers cannot assess any key stage of the qualification process. All assessments will be independent, and therefore credible, by design
- An higher education institute (HEI) would be responsible for ensuring academic rigour. For example, an optometrist supervisor in a practice would not be expected to replace academic education in a university setting
- The standard and EPA document do not provide the route to qualification but only set out how and why the optometry programme is eligible for funding using the apprenticeship levy. The HEI would produce the detail required by the sector as part of the process of seeking GOC approval
- The Institute process focuses on assessing whether optometry might be delivered using the apprenticeship model. It is not guaranteeing that the GOC will approve this route or that any HEI in the country will be willing or able to run such a programme. The latter will

only be something HEIs can consider designing after the Institute approves the standard as meeting the criteria for apprenticeship levy funding.

If this reading of the process is correct, it would also help explain why the standard and EPA documentation lack the level of detail the sector needs to reassure itself that this was a viable and safe route to registration. Put simply – the detailed information would follow when any HEI wishing to provide this route to qualification applied to the GOC for approval.

We also believe there is confusion about the roles of the Institute and the GOC. In our view, a lack of sector engagement around the apprenticeship development process, standard and EPA – and how this relates to GOC functions, outcomes, standards and QA requirements – lies behind much of the confusion.

We would, therefore, welcome an early meeting between the Institute and Trailblazer Group and the ABDO, AOP, College of Optometrists, GOC and ourselves to discuss these issues in more detail and answer the questions posed by the sector above.

Damian Testa
Head of Policy