

The Student Immigration System

A Consultation

A response from the Optical Confederation

QUESTION 1

Do you think that raising the minimum level of study sponsors with a standard sponsor licence can offer under Tier 4 (General) to degree-level and above is an effective way of reducing abuse of Tier 4 (General) route, increasing selectivity and simplifying the current rules?

We have no opinion

QUESTION 2

Do you think that only Highly Trusted Sponsors should be permitted to offer study below degree level at NQF levels 3, 4 and 5 / SCQF levels 6, 7 and 8 in the Tier 4 (General) category?

We have no opinion

QUESTION 3

Do you think that the changes discussed in this section should be phased in?

a) Yes

If you answered yes to the previous question, what time period do you think is appropriate for phasing in these new measures?

c) 25–36 months

QUESTION 4

Do you think that, in the light of the low risk of abuse amongst users of the Tier 4 (Child) route, there should be no changes to the route?

We have no opinion

QUESTION 5

Do you think that all students using Tier 4 (General) category should have passed a secure English language test to demonstrate proficiency in English language to level B2 of the CEFR, in order to improve selectivity and to simplify the current system?

a) Yes

QUESTION 6

Do you think that students from majority English-speaking countries, those who have been awarded a qualification equivalent to UK degree-level or above that was taught in English in a majority English-speaking country, and those who have recently studied in the UK as children should be

exempt from any new language testing requirement?

b) No

QUESTION 7

Do you think that students wishing to study a new course of study should be required to show evidence of progression to study at a higher level?

b) No

QUESTION 8

Do you think that students wanting to study a new course should return home to apply from overseas?

b) No

If you answered no do you have any alternative proposals. Having to return home to apply increases the expense, the inconvenience and the time taken for the student to continue their studies. It seems an unnecessary bureaucratic step which will have the effect of deterring students from continuing their studies in the UK.

QUESTION 9

What changes do you think we should make to the Tier 1 Post Study Work route?

c) Other

If you chose option b) or c) please provide additional comments and suggestions, including on the timing of any changes and any transitional arrangements you feel would be necessary.

Optometry graduates and dispensing optician graduates who have successfully completed a full-time university course need to complete their qualification post graduation by undergoing a period (anything from 9 months to 2 years, depending on the rate of progress of the student) of pre-registration training under supervision within an optometric practice, followed by pre-registration examinations. Some route needs to be given to optometry graduates to enable them to complete their qualification within the UK. The Post Study Work visa is still a preferable route for applicants for the freedom it provides to complete the Pre-Registration period without time constraints and also the lack of a link to a specific employer. Similar concerns may also apply to other healthcare professions which have similar training regimes.

QUESTION 10

Do you think that we should restrict further the amount of work students should be allowed to undertake while studying?

b) No

QUESTION 11

Do you think we should make it simpler for employers to understand the rules around student work, by limiting it to set times, except where they are working on campus?

b) No – this could impact valuable work experience that supplements their studies and improves their competency. Most students work primarily at weekends/vacations but some do evening work because of the nature of the retail environment and shopping centres in which optometric practices are based.

QUESTION 12

Do you think that the minimum ratio of study to work placement permitted should be increased from the current 50:50 to 66:33, except where there is a statutory requirement that the placement should exceed one-third of the total course length?

a) Yes

QUESTION 13

Do you think that only those studying for longer than 12 months should be permitted to bring their family members with them to the UK?

These concerns do not affect optometry or ophthalmic dispensing students, whose degree courses are a minimum of three years

QUESTION 14

Do you think that family members permitted to accompany the student should be prohibited from working?

We have no opinion

QUESTION 15

Do you agree that differential requirements for high and low risk students should be adopted?

We have no particular opinion – optometry and dispensing optician students are relatively low risk – they have a high grade requirement and a very low drop-out rate.

QUESTION 16

Do you believe that we should focus on the abuse of documentary evidence for maintenance and/or qualifications as the basis of differential treatment?

We have no opinion

QUESTION 17

Do you believe that we should also, or alternatively look at the sponsor's rating as a basis for differential treatment?

We have no opinion

QUESTION 18

Do you think that more should be done to raise accreditation and inspection standards to ensure the quality of education provision within private institutions of further and higher education for Tier 4 purposes?

We have no opinion – optometry and ophthalmic dispensing degree course providers are not in the private sector

QUESTION 19

In the light of the proposals described in this document, what do you think will be the main advantages / disadvantages, including any financial impacts, to you, your business or your sector?

These proposals could impact significantly on overseas students coming to the UK to undertake qualification as an optometrist or dispensing optician – requiring a 3 or 4 year degree course. Optometry and dispensing graduates then need to complete their qualification post-graduation by undergoing a period (anything from 9 months to 2 years, depending on the rate of progress of the student) of pre-registration training under supervision within an optical practice, followed by pre-registration examinations. Some route needs to be given to optometry and dispensing graduates to enable them to complete their qualification within the UK. The Post Study Work visa is still a preferable route for applicants for the freedom it provides to complete the pre-registration period without time constraints and also the lack of a link to a specific employer. Requiring graduates to return home to apply for a new visa would be impractical – most graduates start their pre-registration training immediately following their graduation. Many training positions are provided by small, independent practitioners for whom the administrative burden of sponsorship may be too great. There is already a close match between the number of students undertaking such training and the number of supervisors offering such places. Discouraging supervisors, through increasing the already high administrative burden they carry, is not likely to be beneficial.

BACKGROUND CONSULTATION QUESTIONS

Are you responding to this consultation as:

b) On behalf of an organisation/institution etc

I am responding on behalf of the Optical Confederation, a body representing the Association of British Dispensing Opticians, the Association of Contact Lens Manufacturers, the Association of Optometrists, the Federation of Manufacturing Opticians and the Federation of Ophthalmic and Dispensing Opticians. The Confederation's members include the UK's individual optometrists and dispensing opticians, the companies which are the major employers of optometrists and opticians and the manufacturers of equipment and products used by these practitioners.

Please indicate whether you are:

c) Other

Please select your organisation/institution type:

g) An institution or business not directly involved in providing education