



Ag Rialáil Gairmithe Sláinte  
agus Cúraim Shóisialaigh

Regulating Health +  
Social Care Professionals

# Optical Registration Board

Public Consultation Report on the Application for  
Registration Bye-Law

October 2015



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## Introduction

### About the Optical Registration Board

The Optical Registration Board has statutory responsibility for the registration of members of the profession; approval and monitoring of education and training programmes; establishing the code of professional conduct and ethics and standards of performance to which Optometrists and Dispensing Opticians must adhere and recognition of qualifications gained outside the State.

### About CORU

CORU is responsible for regulating health and social care professions. It comprises the Health and Social Care Professionals Council and the registration boards established under the Health and Social Care Professionals Act 2005 (as amended).

CORU's role is to protect the public by promoting high standards of professional conduct, professional education, training and competence amongst the designated professions. The designated professions under the Act are social workers, clinical biochemists, dietitians, medical scientists, occupational therapists, optometrists and dispensing opticians, orthoptists, physiotherapists, podiatrists, psychologists, radiographers, social care workers and speech and language therapists.

### The Public Consultation Process

#### Background

The Optical Registration Board has statutory responsibility for the registration of members of the profession. This draft bye-law sets out the process to be undertaken by professionals seeking to apply for registration.

#### Publicising the Consultation Process

A public consultation on the draft Bye-Law was held between and 30 July and 08 September 2015.

A number of channels were used to publicise the consultation process and invite the submission of observations. These included:

- An advertisement was published in the Irish Times on 30 July 2015 (see appendix two).
- A press release was placed on [www.coru.ie](http://www.coru.ie) (See appendix one for a copy of the press release).
- An online survey was developed. An email with a link was also sent to a targeted list of stakeholders including the Professional Bodies, Trade Unions, Educators and other interested parties who have previously corresponded with CORU (see appendix 3 for a copy of the survey).



- Information on the consultation along with a link to the online feedback form was hosted on the CORU website.

People were invited to participate in the consultation process in a number of ways:

- They could contact CORU by phone to request a copy of the draft Bye-Law and to offer feedback
- They could visit [www.coru.ie](http://www.coru.ie) and choose to complete an online feedback form, to print a copy of the form and post it, or email it to CORU.
- They could email submissions to [consultation@coru.ie](mailto:consultation@coru.ie)

### Overview of responses to consultation

There were 4 responses to the public consultation:

Online survey	1
Email submissions	3
Postal submissions	0
Telephone	0

### Online Feedback Form

Respondents were asked to identify if they were offering feedback on their own behalf or on behalf of an organisation.

Individual	1
Professional Organisation	3
Unknown	0

Submissions were received on behalf of the following individuals

- Arthur Gill

Submissions were received on behalf of the following professional organisations:

- The Federation of (Ophthalmic and Dispensing) Opticians (FODO)
- The Association of Optometrists Ireland (AOI)
- The Pharmaceutical Society of Ireland (PSI)

### Acknowledgements

CORU would like to extend its appreciation and thanks to all those that participated in the consultation process. The report from the consultation process was reviewed by the Optical Registration Board.



## Issues emerging from the consultation process

### The language and layout of the Bye-Law

1. One applicant requested that the language and structure of paragraph 6 required some rework.

#### **Board Response:**

**Section 6 of the bye law provides for those who are applying for registration and who may be resuming the practice of their profession. It includes those who may have been previously registered with CORU in the General or Contact Lenses Division of the Dispensing Opticians Register or those previously registered with the Opticians Board with or without the Certificate of Entitlement to fit contact lenses. The matters covered by this section are complex and hence the provision may be a little difficult to read. The matters covered by this provision will be more clearly specified in the guidance notes provided to those applying for registration.**

2. One respondent highlighted the importance for applicants to keep their details up to date in so far as possible in the interest of patient safety and public protection.

#### **Board Response:**

**Section 45 of the Act requires that registrants keep their details accurate and up to date. Each year at the time of registration renewal, applicants are reminded and provided with the opportunity to update their personal contact details and place of employment. The Board considers that these mechanisms are adequate to ensure that applicants keep their details up to date.**

3. The requirements for those who apply for registration on the basis of qualifications which are not presented on the list of recognised qualifications as provided for in section 48 of the Act.

One respondent expressed concern that applicants for re-registration will be treated more harshly than first-time applicants from other countries. The respondent also expressed concern that applicants for registration in Ireland who are from other countries should have to prove that the qualifications they put forward are adequate to meet competencies and standards of practice in Ireland regardless of what the qualifications are titled.

In conclusion, the respondent requested that an additional provision be entered in the Application for Registration Bye-Law that would necessitate those who have



qualified in other countries to fulfil return to practice requirements as set out in the Return to Practice Bye-Law

**Board Response:**

**A first-time applicant who has been engaged in the practice of the profession outside of Ireland for two years or more is required to comply with the provisions of paragraph 11 of the Return to Practice bye-law. This is the case whether or not they have had to go through the recognition process prior to applying for registration. Where the Board is not satisfied with the person's practice and experience outside of Ireland, the Return to Practice requirements may be applied to them. These applicants are not therefore treated more favourably than an applicant who has previously practised in Ireland and applies for re-registration.**

**Applicants whose qualifications were awarded outside the State are required to apply for recognition of their qualifications prior to applying for registration. If the applicant is entitled to practice in another EU Member State, CORU is bound to act in compliance with Directive 2005/36/EC in dealing with the application. The process does not rely upon the title of the qualification, instead it involves a finding by the Board that the professional activities are comparable in the EU State where the applicant is entitled to practice. This is followed by an assessment of the applicant's qualifications against the Standards of Proficiency in order to determine whether compensation measures are required. The concern raised does not require a change to the bye-law and is already captured by the recognition process.**

**Other issues**

No other issues were raised in relation to the draft bye-law.

**Conclusion**

The Optical Registration Board considered all submissions in detail at the meeting held on the 22 September 2015. The Board determined that it was not necessary to make amendments to the draft bye-law as a consequence of the submissions and agreed to submit the draft bye-law to council for approval. The Council approved the draft Bye Law on the 14 October 2015. The Optical Registration Board made the Bye Law on the 21 October 2015 and submitted to the Minister for laying before the House of the Oireachtas.



## Appendix 1: Press release

### Optical Registration Board - Public Consultation

CORU is preparing for the transfer of the registers for dispensing opticians and optometrists from Bord na Radharcmhastóirí (the Opticians Board) to the Optical Registration Board at CORU, later this year.

The Optical Registration Board at CORU is currently working to put in place the standards that will determine how the two professions are regulated in the future.

The Board wants to hear the views of members of the professions, the public and stakeholders on a number of matters relating to the statutory registration of optometrists and dispensing opticians at CORU:

- **Optical Registration Board Draft Application for Registration Bye-Law 2015**
- **Optical Registration Board Draft Conditions for Registration in the Contact Lenses Division of the Register of Dispensing Opticians Bye-Law 2015**
- **Optical Registration Board Draft Return to Practice Bye-Law 2015**

By participating in this consultation process you are helping to shape how optometrists and dispensing opticians are regulated.

The full text of each of the bye-laws can be viewed below.

- [Optical Registration Board Draft Application for Registration Bye-Law 2015](#)
- [Optical Registration Board Draft Conditions for Registration in the Contact Lenses Division of the Register of Dispensing Opticians Bye-Law 2015](#)
- [Optical Registration Board Draft Return to Practice Bye-Law 2015](#)

or can be requested by emailing [consultation@coru.ie](mailto:consultation@coru.ie) or calling us on 01 2933160. Feedback can be provided by filling in the consultation feedback forms, which can be found at the following links:

- [Optical Registration Board Draft Application for Registration Bye-Law 2015](#)
- [Optical Registration Board Draft Conditions for Registration in the Contact Lenses Division of the Register of Dispensing Opticians Bye-Law 2015](#)
- [Optical Registration Board Draft Return to Practice Bye-Law 2015](#)

You can also email your feedback to [consultation@coru.ie](mailto:consultation@coru.ie) or send it in writing to Public Consultation, CORU, 13 - 15 The Mall, Beacon Court, Bracken Rd., Sandyford, Dublin 18.



The **closing date** for receipt of submissions is **5:00pm on Tuesday, September 8 2015**. Any submissions received after that time will not be considered.

## Appendix 2: Copy of Advertisement



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Public  
Consultation

### Statutory Registration of Optometrists and Dispensing Opticians at CORU

The Optical Registration Board at CORU wants to hear the views of optometrists, dispensing opticians, and other interested parties on a number of matters relating to the statutory registration of optometrists and dispensing opticians:

- Application for Registration Bye-Law 2015
- Conditions for Registration in the Contact Lenses Division of the Register of Dispensing Opticians Bye-Law 2015
- Return to Practice Bye-Law 2015

Further information on these consultations including a 'feedback form' is available on [www.coru.ie](http://www.coru.ie) or by contacting CORU on 01 2933160 or emailing [consultation@coru.ie](mailto:consultation@coru.ie)

The closing date for receipt of submissions is 5pm on Tuesday, 8 September 2015. Submissions received after this date will not be considered.

CORU, 13-15 The Mall, Beacon Court, Bracken Road, Sandyford, Dublin 18.  
T: 01 2933160 E: [info@coru.ie](mailto:info@coru.ie) W: [www.coru.ie](http://www.coru.ie)



## Appendix 3: Copy of Online Feedback Form

Thank you for taking the time to participate in CORU's consultation process on the Optical Registration Board Application for Registration Bye-Law as drafted. This bye-law sets out the requirements for those applying for registration as an Optometrist or Dispensing Optician.

The Optical Registration Board was appointed by the Minister for Health in February 2015 to regulate the professions of optometrist and dispensing optician at CORU. It is anticipated that the Optical Registration Board will take over this function from Bord na Radharcmhastóirí later this year. The Optical Registration Board is currently making arrangements for this transfer, including preparing the registration applications process.

CORU is working to protect the public by promoting high standards of professional conduct, education, training and competence through the statutory registration of Health and Social Care Professionals. If you have any queries about the consultation process or completing the survey, please contact CORU on (01) 2933160 or email [consultation@coru.ie](mailto:consultation@coru.ie).

The closing date for receipt of submissions is 5:00pm on Tuesday, 8 September 2015. Any submissions received after that time will not be considered. A report on the consultation process will be published on [www.coru.ie](http://www.coru.ie). We want to hear the views of the public and the profession and by participating in this consultation process. You are helping to shape how Optometrists and Dispensing Opticians are regulated.

Yours faithfully,

Ginny Hanrahan  
Registrar

### 1. Personal Information (optional)

First name:	<input type="text"/>
Surname:	<input type="text"/>
Email:	<input type="text"/>
Telephone number:	<input type="text"/>

### 2. Are you contributing to this survey in (please tick one)

- a personal capacity?
- on behalf of an organisation?

If on behalf of an organisation, please specify



**3. Please indicate if you would like your name and/or organisation to be kept confidential and excluded from the consultation report.**

- Include in consultation report
- Exclude from consultation report

It would be helpful if you could explain if you regard the information you have provided as confidential.

**4. Please provide any comments you have on the Optical Registration Board Application for Registration Bye-Law as drafted.**

**5. Is the language used and the layout of the draft bye-law easy to follow and understand?**

- Yes
- No

Use the space below for your comments

**6. Is there anything that you consider should be amended in this bye-law?**



- Yes
- No

Please provide further details below

**7. Is there anything you believe should be added to this bye-law?**

- Yes
- No

Please provide further details below

**8. Is there anything you believe should be removed from this bye-law?**

- Yes
- No

Please provide further details below

**9. How did you hear about this consultation? (please tick as many as apply)**

- Advertisement in a newspaper
- On [www.coru.ie](http://www.coru.ie)
- By email

Other (please specify)



## Appendix 4: Bye-Law

[Please click on the link here to view the Application for Registration Bye Law in full text.](#)