Impact Assessment Screening Tool

Name of policy or process:	Policy and Process for Updating Gender on the GOC Register
Purpose of policy or process:	Supporting registrants to update gender on the GOC register
Team/Department:	GRA Project Team
Date:	Original screening undertaken Dec 2021, reviewed Dec 2022
Screen undertaken by:	Aaron Grell, Yani King, and John Duncan
Approved by:	*Tba*
Date approved:	*Tba*
Instructions:	- Circle or colour in the current status of the project or policy for each row. **Do not miss out any rows**. If it is not applicable – put N/A, if you do not know put a question mark in that column. - This is a live tool, you will be able to update it further as you have completed more actions. - Make sure your selections are accurate at the time of completion. - Decide whether you think a full impact assessment is required to list the risks and the mitigating/strengthening actions. - If you think that a full impact assessment is **not** required, put you reasoning in the blank spaces under each section. - You can include comments in the boxes or in the space below. - Submit the completed form to the Compliance Manager for approval.

A) Impacts	High Risk	Medium Risk		Low Risk	? or N/A
1. Reserves	It is likely that reserves may be required	It is possible that reserves may be required		No impact on the reserves / not used	
2. Budget	No budget has been allocated or agreed, but will be required.	Budget has not been allocated, but is agreed to be transferred shortly	Budget has been allocated, but more may be required (including in future years)	Budget has been allocated and it is unlikely more will be required	N/A
3. Legislation, Guidelines or Regulations	Not sure of the relevant legislation	Aware of all the legislation but not yet included within project/process	Aware of the legislation, it is included in the process/project, but we are not yet compliant	Aware of all the legislation, it is included in the project/process, and we are compliant	
4. Future legislation changes	Legislation is due to be changed within the next 12 months	Legislation is due to be changed within the next 24 months	Legislation may be changed at some point in the near future	There are no plans for legislation to be changed	
5. Reputation & Media	This topic has high media focus at present or in last 12 months	This topic has growing focus in the media in the last 12 months	This topic has little focus in the media in the last 12 months	This topic has very little or no focus in the media in the last 12 months	
6. Resources (people & equipment)	Requires new resource	Likely to complete with current resource, or by sharing resource	Likely to complete with current resource	Able to complete with current resource	
7. Sustainability	Less than 5 people are aware of the process/project, and it is not recorded centrally nor fully	Less than 5 people are aware of the project/process, but it is recorded centrally and fully	More than 5 people are aware of the process/project, but it is not fully recorded and/or centrally	More than 5 people are aware of the process/ project and it is clearly recorded centrally	
	No plans are in place for training, and/or no date set for completion of training	Training material not created, but training plan and owner identified and completion dates set	Training material and plan created, owner identified and completion dates set	Training completed and recorded with HR	
8. Communication (Comms) / Raising Awareness	No comms plan is in place, and no owner or timeline identified	External comms plan is in place (including all relevant stakeholders) but not completed, an owner and completion dates are identified	Internal comms plan is in place (for all relevant levels and departments) but not completed, and owner and completion dates are identified	Both internal and external comms plan is in place and completed, owner and completion dates are identified	
	Not sure if needs to be published in Welsh	Must be published in Welsh, Comms Team aware.		Does not need to be published in Welsh.	

Please put commentary below about your Impacts ratings above:

External comms plan is in place: External comms plan discussed with the communications team and will be fleshed out more for public consultation in Mid-2023 (PRIDE Month). Planning for this will be in April 2023

Reputation & Media: On going conversations on Trans rights. Additionally, govt have decided new data fields for national census which has caused some controversy amongst the LGBTQ+ community (Dec 2022).
No plans are in place for training, and/or no date set for completion of training: no plans set, however considering in implementation (from Mid-2023)

Welsh language scheme: Still waiting on Welsh Govt to decide what needs to be published in Welsh (April 2021)

B) Information Governance	High Risk	Medium Risk		Low Risk	? or N/A
1. What data is involved?	Sensitive personal data	Personal data	Private / closed business data	Confidential / open business data	
2. Will the data be anonymised?	No	Sometimes, in shared documents	Yes, immediately, and the original retained	Yes, immediately, and the original deleted.	
3. Will someone be identifiable from the data?	Yes	Yes, but their name is already in the public domain(SMT/Council)	Not from this data alone, but possibly when data is merged with other source	No – all anonymised and cannot be merged with other information	
4. Is **all** of the data collected going to be used?	No, maybe in future	Yes, but this is the first time we collect and use it	Yes, but it hasn't previously been used in full before	Yes, already being used in full	
5. What is the volume of data handled per year?	Large – over 4,000 records	Medium – between 1,000-3,999 records		Less than 1,000 records	
6. Do you have consent from data subjects?	No	Possibly, it is explained on our website (About Us)	Yes, explicitly obtained, not always recorded	Yes, explicitly obtained and recorded/or part of statutory duty/contractual	
7. Do you know how long the data will be held?	No – it is not yet on retention schedule	Yes – it is on retention schedule	Yes – but it is not on the retention schedule	On retention schedule **and** the relevant employees are aware	
8. Where and in what format would the data be held? (delete as appropriate)	Paper; at home/off site; new IT system or provider; Survey Monkey; personal laptop	Paper; Archive room; office storage (locked)	GOC shared drive; personal drive	other IT system (in use); online portal; CRM; Scanned in & held on H: drive team/dept folder	
9. Is it on the information asset register?	No	Not yet, I've submitted to Information Asset Owner (IAO)	Yes, but it has not been reviewed by IAO	Yes, and has been reviewed by IAO **and** approved by Gov. dept.	
10. Will data be shared or disclosed with third parties?	Yes, but no agreements are in place	Yes, agreement in place	Possibly under Freedom of Information Act	No, all internal use	
11. Will data be handled by anyone outside the EU?	Yes	-	-	No	
12. Will personal or identifiable data be published?	Yes – not yet approved by Compliance	Yes- been agreed with Compliance	No, personal and identifiable data will be redacted	None - no personal or identifiable data will be published	

13. Individuals handling the data have been appropriately trained	Some people have never trained by GOC in IG.	All trained in IG but over 12 months ago		Yes, all trained in IG in the last 12 months	

Please put commentary below about reasons for Information Governance ratings:
Sensitive personal data: There are protections for gender reassignment as part of the gender reassignment act and we therefore need to be careful of how we handle the data and protect the individual's data. The policy has outlined the process of how this is done by the registration team and what happens with the data on CRM. Will the data be anonymised? Anonymised is not quite the right term in this case, as two profiles would exist. An active profile of data on CRM of the new identity and a closed data profile of the former identity. In the policy we have included protections to ensure the individual's data is unlinked (anonymised). There will be a note on each CRM profile in which certain members of the registration team will be able to see. Will someone be identifiable from the data? Although data is unlinked there will be a note on each CRM profile in which certain members of the registration team will be able to see, in order to support queries and understand any actions with regards to FTP. Is it on the information asset register? Need to speak with Information Governance Officer to work out how data handle in association to Information Assurance Officer. EU: CRM Project Manager lives outside of the EU and will have access to CRM data. Will personal or identifiable data be published? Their data, although limited, will be published on the register as required as a registrant. This is consented on the application form.

C) Human Rights, Equality and Inclusion	High Risk	Medium Risk	Medium Risk	Low Risk	? or N/A
Main audience/policy user	Public			Registrants, employees or members	
Participation in a process (right to be treated fairly, right for freedom of expression)	Yes, the policy, process or activity restricts an individual's inclusion, interaction or participation in a process.			No, the policy, process or activity does not restrict an individual's inclusion, interaction or participation in a process.	
The policy, process or activity includes decision-making which gives outcomes for individuals (right to a fair trial, right to be treated fairly)	Yes, the decision is made by one person, who may or may not review all cases	Yes, the decision is made by one person, who reviews all cases	Yes, the decision is made by an panel which is randomly selected; which may or may not review all cases.	Yes, the decision is made by a representative panel (specifically selected). No, no decisions are required.	
	There is limited decision criteria; decisions are made on personal view	There is some set decision criteria; decisions are made on 'case-by-case' consideration.	There is clear decision criteria, but no form to record the decision.	There is clear decision criteria and a form to record the decision.	
	There is no internal review or independent appeal process	There is a way to appeal independently, but there is no internal review process.	There is an internal review process, but there is no way to appeal independently	There is a clear process to appeal or submit a grievance to have the outcome internally reviewed and independently reviewed	
	The decision-makers have not received EDI & unconscious bias training, and there are no plans for this in the next 3 months.	The decision-makers are due to receive EDI & unconscious bias training in the next 3 months, which is booked.	The decision-makers are not involved before receiving EDI & unconscious bias training.	The decision-makers have received EDI & unconscious bias training within the last 12 months, which is recorded.	
Training for all involved	Less than 50% of those involved have received EDI training in the last 12	Over 50% of those involved have received EDI training, and the training are booked in for all others involved in the next 3 months.		Over 80% of those involved have received EDI training in the last 12	

	months; and there is no further training planned		months, which is recorded.	
Alternative forms – electronic / written available?	No alternative formats available – just one option	Yes, primarily internet/computer-based but paper versions can be used	Alternative formats available and users can discuss and complete with the team.	
Venue where activity takes place	Building accessibility not considered	Building accessibility sometimes considered	Building accessibility always considered	N/A
	Non-accessible building;	Partially accessible buildings;	Accessible buildings, although not all sites have been surveyed	All accessible buildings and sites have been surveyed	N/A
Attendance	Short notice of dates/places to attend	Medium notice (5-14 days)of dates/places to attend	Planned well in advance	N/A
	Change in arrangements is very often	Change in arrangements is quite often	Change in arrangements is rare	N/A
	Only can attend in person	Mostly required to attend in person	Able to attend remotely	N/A
	Unequal attendance / involvement of attendees	Unequal attendance/ involvement of attendees, but this is monitored and managed.	Attendance/involvement is equal, and monitored per attendee.	N/A
	No religious holidays considered; only Christian holidays considered	Main UK religious holidays considered	Main UK religious holidays considered, and advice sought from affected individuals if there are no alternative dates.	Religious holidays considered, and ability to be flexible (on dates, or flexible expectations if no alternative dates).	N/A
Associated costs	Potential expenses are not included in our expenses policy	Certain people, evidencing their need, can claim for potential expenses, case by case decisions	Most users can claim for potential expenses, and this is included in our expenses policy; freepost available.	N/A
Fair for individual's needs	Contact not listed to discuss reasonable adjustments, employees not aware of reasonable adjustment advisors.	Most employees know who to contact with queries about reasonable adjustments	Contact listed for reasonable adjustment discussion	N/A
Consultation and Inclusion	No consultation; consultation with internal employees only	Consultation with employees and members	Consultation with employees, members, and wider groups	Consultation with policy users, employees,	

				members and wider groups.	

Please put commentary below for Human Rights, Equalities and Inclusion ratings above:
Assessment of each characteristic:

The internal data on trans registrants is limited due to low numbers. Therefore, the impact is on research conducted by other organisations. The impact will also be later assessed after full consultation.

Age: Positive. Older people may experience prejudice relating to their age and this may compound their experience of transphobic discrimination. Older people may also find it more difficult to transition due to a proportionately longer period not being open about their gender identity and experiencing less engaged societal debate about trans issues. Therefore, a clear and transparent process makes this easier for older people to transition.

Disability: Positive. If a trans employee has been diagnosed as having gender dysphoria and this has a long-term adverse impact on their ability to carry out normal day-to-day activities, then they may be protected under the provisions of the Equality Act 2010. According to a 2018 Stonewall report 70% of non-binary have said the experienced depression, 79% of non-binary people and 71% of trans people have experienced anxiety. 64% of trans people felt like their life wasn't worth living, with 12% attempting to take their own life.

Sex: Trans people have historically experienced discrimination mainly to poorly informed practice in relation to data collection and having no recognition on the survey.

Gender: Positive. This policy seeks to directly impact this community and make the process of transitioning in their professional life easier, transparent and data secure.

Marriage: - Up until the 1970's, transgendered people in the United Kingdom were able to marry people of the opposite sex with the unofficial correcting of birth certificates. Although not entirely legal, the fact a person could show with a birth certificate the sex they claimed to be allowed them to enter into the union of marriage. The Gender Recognition Act 2004 granted full legal recognition of a trans person's new gender for all purposes, ranging from marriage to the issuance of a new birth certificate.

Pregnancy/Maternity: - Pregnancy is possible for transgender men who retain functioning ovaries and a uterus. Regardless of prior hormone replacement therapy (HRT) treatments, the progression of pregnancy and birthing procedures are typically the same as those of cisgender women. |

Race: Trans people may face dual discrimination on the grounds of their race and their gender reassignment. Black and Global Majority trans people are more likely to be discriminated against.

Religion: Neutral. According to the Equality Network, around 70% of trans people have no religious beliefs. Their LGBT Equality Report (2015) suggests trans people from certain faith backgrounds will face particular forms of prejudice from within their faith communities. LGBT rights are often contrasted against religious rights despite LGBT people being represented in all faith groups. The report suggests that trans people with faith beliefs are less able to be open about themselves than people with no faith conviction.

Sexual Orientation: Positive. Trans people are often discriminated against on the grounds of their perceived sexual orientation due mainly to misunderstanding of the relationship between sexual orientation and gender reassignment. The terms can mistakenly be used interchangeably. Trans men and women can experience homophobic abuse that compounds the overall experience of discrimination.

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Policy – Impact Assessment

Step 1: Scoping the IA

Name of the policy/function:	Policy and Process for Updating Gender on the GOC Register
Assessor:	Aaron Grell, Yani King, John Duncan
Date IA started:	February 2021
Date IA completed:	December 2021; reviewed December 2022
Date of next IA review:	December 2025
Purpose of IA:	
Approver:	
Date approved:	

Q1. Screening Assessment

Has a screening assessment been used to identify the potential relevant risks and impacts? Tick all that have been completed:

☐ Impacts

☐ Information Governance (Privacy)

☐ Human Rights, Equality & Inclusion

☐ None have been completed

Q2.About the policy, process or project

What are the main aims, purpose and outcomes of the policy or project?

You should be clear about the policy proposal: what do you hope to achieve by it?

Who will benefit from it?

Aims: To ensure that our policy, last reviewed in 2014, is in line with current legislation and best practice. An up to date policy for managing GRA requests from our registrants. Protection for our registrants, especially those who are transgender. Better inclusion of the transgender community. Reduced legal risks for the GOC.
Purpose and Outcome: New policy complies with legislation, is clear to users, and easy to apply and fair.
Who will benefit: Transgender Community

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

Which aspects/activities of the policy are particularly relevant to impact or risk? At this stage you do not have to list possible impacts, just identify the areas.

Activity/Aspect
Operational aspect of managing the application – data breach risks apply
Training and not understanding the process – Not managing the CRM actions correctly

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Q4. Gathering the evidence

List below available data and research that will be used to determine impact of the policy, project or process.

Consider each part of the process or policy and identify where risks or implications might be found for: 1) Impacts; 2) Information Governance and Privacy implications; and 3) Human Rights, Equality and Inclusion.

Available evidence – used to scope and identify impact
EDI Report
Higher education statistics agency
Other healthcare regulator research
Charity research (Mermaids)
Equality Impact assessment from NHS Glasgow on their trans policy
Government Legislation
GDPR rules
Data Protection Act 2018
Equality Act 2010
Gender Recognition Act 2004
GOC Name Change Policy
GOC Data Retention Policy
GOC Information Governance Framework
Various higher education institution trans policies

Q5. Evidence gaps

Do you require further information to gauge the probability and/or extent of impact? Make sure you consider:

Impacts;

Information Governance and Privacy implications; and

Human Rights, Equality and Inclusion implications.

If yes, note them here:

Opinions and feedback from registrants and professional bodies

Q6. Involvement and Consultation

Consultation has taken place, who with, when and how:
Limited consultation in November and full consultation in January
Summary of the feedback from consultation:
TBC
Link to any written record of the consultation to be published alongside this assessment:
TBC
How engagement with stakeholders will continue:

Future EDI reports
EDI updates during SMT and Council Meetings

Step 2: Assess impact and opportunity to promote best practice

Using the evidence you have gathered what if any impacts can be identified. Please use the table below to document your findings and the strand(s) affected.

What can be done to remove or reduce any impact identified?

Consider each part of the process or policy and identify where risks might be found for equality, human rights and information governance and privacy.

Ensure any gaps found in Q5 are recorded as actions and considerations below.

Use the table below to document your strengthening actions (already in place or those to further explore or complete).

Activity/ Aspect	Potential/actual Impact	Strengthening actions to remove or reduce impact. For actions, include timeframes.
Training	Training and not understanding the process – Not managing the CRM actions correctly	Training plan in development
Sensitive Personal Data	Operational aspect of managing the application – data breach risks apply	Making sure policy and process is robust

Step 3: Monitoring and review

Q6. What monitoring mechanisms do you have in place to assess the actual impact of your policy?

Feedback form
Registrant survey
User testing
Full review of policy and process in 2025

Please provide a review date to complete an update on this assessment (three months from initial completion).

Date: 2/4/2023