

## Impact Assessment Screening Tool

---

<b>Name of policy or process</b>	Standards Review
<b>Purpose of policy or process</b>	To update the standards that we set for students and fully-qualified individuals, with consequential amendments made to the standards for optical businesses.
<b>Team/Department</b>	Policy & Standards
<b>Date</b>	13 <sup>th</sup> November 2023 (Updated 21 August 2024)
<b>Screen undertaken by</b>	Rebecca Chamberlain and Charlotte Urwin
<b>Approved by</b>	Steve Brooker, Director of Regulatory Strategy
<b>Date approved</b>	6 September 2024
<b>Instructions:</b>	<ul style="list-style-type: none"> <li>• Circle or colour in the current status of the project or policy for each row.</li> <li>• <b>Do not miss out any rows.</b> If it is not applicable – put N/A, if you do not know put a question mark in that column.</li> <li>• This is a live tool, you will be able to update it further as you have completed more actions.</li> <li>• Make sure your selections are accurate at the time of completion.</li> <li>• Decide whether you think a <b>full</b> impact assessment is required to list the risks and the mitigating/strengthening actions.</li> <li>• If you think that a full impact assessment is <b>not</b> required, put your reasoning in the blank spaces under each section.</li> <li>• You can include comments in the boxes or in the space below.</li> <li>• Submit the completed form to the Compliance Manager for approval.</li> </ul>

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		<b>No impact on the reserves / not used</b>	
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)	<b>No budget is required OR budget has been allocated and it is unlikely more will be required</b>	
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	<b>Aware of all the legislation, it is included in the project/process, and we are compliant</b>	
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	<b>Legislation may be changed at some point in the near future</b>	There are no plans for legislation to be changed	
5. Reputation and media	This topic has high media focus at present or in last 12 months	<b>This topic has growing focus in the media in the last 12 months</b>	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 and equipment)	Requires new resource	Likely to complete with current resource, or by sharing resource	Likely to complete with current resource	<b>Able to complete with current resource</b>	
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	<b>More than 5 people are aware of the process/project and it is clearly recorded centrally</b>	
	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	<b>NA</b>
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	<b>Both internal and external comms plan is in place and completed, owner and completion dates are identified</b>	
	Not sure if needs to be published in Welsh	<b>Must be published in Welsh;</b>		Does not need to be published in Welsh	

Please put commentary below about your impacts ratings above:

**Point 3:** The revisions include an introductory statement which makes clear that registrants must follow all relevant legislation.

**Point 4:** We are aware that there are new pieces of primary legislation in the pipeline, which may come into effect in the lifecycle of these standards, e.g., legislation on Artificial Intelligence. This has been addressed by inclusion of a generic statement which requires registrants to follow all relevant legislation.

**Point 5:** There has been some media attention on the Standards Review project since its official launch in April 2023. The proposed revisions to the standards are likely to receive further media attention.

**Point 8:** A new communications plan for the publication and implementation of the revised standards will be developed in collaboration with the Communications Department.

The risks identified in this section are mainly low, and the medium risks have been addressed as far as possible, therefore a full impact assessment is not necessary.

B) Information governance	High risk	Medium risk		Low risk	? or N/A
1. What data is involved?	Sensitive personal data	Personal data	<b>Private / closed business data</b>	Confidential / open business data	
2. Will the data be anonymised?	<b>No</b>	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	<b>NA</b>
4. Is <b>all</b> of the data collected going to be used?	No, maybe in future	<b>Yes, but this is the first time we collect and use it</b>	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		<b>Less than 1,000 records</b>	
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	<b>NA</b>
7. Do you know how long the data will be held?	No – it is not yet on retention schedule	<b>Yes – it is on retention schedule</b>	Yes – but it is not on the retention schedule	On retention schedule <b>and</b> 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)	<b>GOC shared drive; personal drive</b>	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)	<b>Yes, but it has not been reviewed by IAO</b>	Yes, and has been reviewed by IAO <b>and</b> approved by Gov. dept.	
10. Will data be shared or disclosed with third parties?	Yes, but no agreements are in place	<b>Yes, agreement in place</b>	Possibly under Freedom of Information Act	No, all internal use	
11. Will data be handled by anyone outside the EU?	Yes	-	-	<b>No</b>	
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	<b>None - no personal or identifiable data will be published</b>	

B) Information governance	High risk	Medium risk		Low risk	? or N/A
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:

**Point 2:** The revisions themselves do not relate to specific individuals so there is no requirement to anonymise the data.

**Point 4:** All the consultation responses have been reviewed and used to inform a) the final revisions to the standards and b) the consultation response report.

**Point 7:** Retention schedule requires consultation documents to be retained for 6 years after the date created – the consultation document will contain copies of the revised standards.

**Point 9:** All documents relating to the Standards Review project are on the asset register.

The risks identified in this section are low or medium, and the medium risks have been addressed as far as possible, therefore a full impact assessment is not necessary.

C) Human rights, equality and inclusion	High risk	Medium risk		Low risk	? or N/A
1. Main audience/policy user	<b>Public</b>			<b>Registrants, employees or members</b>	
2. 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			<b>No, the policy, process or activity does not restrict an individual's inclusion, interaction or participation in a process</b>	
3. 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	<b>Yes, the decision is made by a representative panel (specifically selected) OR No, no decisions are required</b>	
	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	<b>There is clear decision criteria and a form to record the decision</b>	
	<b>There is no internal review or independent appeal process</b>	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 and unconscious bias training, and there are no plans for this in the next 3 months	The decision-makers are due to receive EDI and unconscious bias training in the next 3 months, which is booked	The decision-makers are not involved before receiving EDI and unconscious bias training	<b>The decision-makers have received EDI and unconscious bias training within the last 12 months, which is recorded</b>	

<b>C) Human rights, equality and inclusion</b>	<b>High risk</b>	<b>Medium risk</b>		<b>Low risk</b>	<b>? or N/A</b>
4. Training for all involved	Less than 50% of those involved have received EDI training in the last 12 months; and there is no further training planned	Over 50% of those involved have received EDI training, and the training are booked in for all others involved in the next 3 months.		<b>Over 80% of those involved have received EDI training in the last 12 months, which is recorded</b>	
5. Alternative forms – electronic / written available?	No alternative formats available – just one option	Yes, primarily internet/computer-based but paper versions can be used		<b>Alternative formats available and users can discuss and complete with the team</b>	
6. Venue where activity takes place	Building accessibility not considered	Building accessibility sometimes considered		Building accessibility always considered	<b>NA</b>
	Non-accessible building;	Partially accessible buildings;	Accessible buildings, although not all sites have been surveyed	All accessible buildings and sites have been surveyed	<b>NA</b>
7. Attendance	Short notice of dates/places to attend	Medium notice (5-14 days) of dates/places to attend		<b>Planned well in advance</b>	
	Change in arrangements is very often	Change in arrangements is quite often		<b>Change in arrangements is rare</b>	
	Only can attend in person	Mostly required to attend in person		<b>Able to attend remotely</b>	
	Unequal attendance / involvement of attendees	Unequal attendance/ involvement of attendees, but this is monitored and managed		<b>Attendance/involvement is equal, and monitored per attendee</b>	
	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	<b>Religious holidays considered, and ability to be flexible (on dates, or flexible expectations if no alternative dates)</b>	

C) Human rights, equality and inclusion	High risk	Medium risk		Low risk	? or N/A
8. Associated costs	<b>Potential expenses are not included in our expenses policy</b>	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	
9. 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	<b>See EDI section</b>
10. Consultation and Inclusion	No consultation; consultation with internal employees only	Consultation with employees and members	Consultation with employees, members, and wider groups	<b>Consultation with policy users, employees, members and wider groups</b>	

Please put commentary below for human rights, equalities and inclusion ratings above:

**Point 3:** The revised standards will be reviewed and signed off by Council. Acceptance of the revised standards will be formally recorded in Council minutes. There is no internal GOC appeals process – Council's decision is final, however revisions to the standards have been informed by significant stakeholder engagement. Council members undergo annual EDI training.

**Point 5:** We will publish the standards in English and Welsh, with alternative formats available on request.

**Point 10:** We received 39 written consultation responses and held eight stakeholder events to give stakeholders the opportunity to discuss the changes.

The risks identified in this section are mainly low, therefore a full impact assessment is not necessary.



Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
Age	Positive	<p>The revised standards do not include any amendments or additions that would have a detrimental impact on anyone based on their age.</p> <p>The following new standard in the Standards for Optical Businesses may also have a positive impact on young people in particular:</p> <p><b>“Provide support for staff who have experienced discrimination, bullying, or harassment in the workplace.”</b></p> <p>We know from our registrant survey that registrants under 35 are more likely to experience discrimination, bullying and harassment, so the addition of this standard will contribute to improved support for those registrants.</p> <p>The revisions to standard 13 relating to behaviour between colleagues should have a positive impact across all protected characteristics.</p> <p>The consultation did not identify any additional impacts on individuals based on age.</p>
Disability	Positive	<p>The revised standards do not include any amendments or additions that would have a detrimental impact on anyone with a disability.</p> <p>The following standard may have a positive effect on those with a disability.</p> <p><b>“If you have a serious communicable disease, or have been exposed to a serious communicable disease, and believe you could be a carrier, you should not practise until you have sought appropriate medical advice. You must follow the medical advice received, which may include the need to suspend, or modify your practice and/or guidance on how to prevent transmission of the disease to others. For guidance on serious communicable diseases, refer to current public health guidance.”</b></p>

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
		<p>Those with a disability that relates to having a compromised immune system will benefit from the practice of reducing the possibility of exposure to communicable diseases and find access to services safer.</p> <p>The following new standard in the Standards for Optical Businesses may also have a positive impact on those with a disability:</p> <p><b>“Provide support for staff who have experienced discrimination, bullying, or harassment in the workplace.”</b></p> <p>We know from our registrant survey that registrants with a disability are more likely to experience discrimination, bullying and harassment, so the addition of this standard will contribute to improved support for those registrants.</p> <p>As above, the revisions to standard 13 relating to behaviour between colleagues should have a positive impact across all protected characteristics.</p> <p>Several respondents to the consultation stated that they believed the standards would have a positive impact by raising awareness and potentially offering better protection for individuals with disabilities or vulnerabilities.</p>
Sex	Positive	<p>The revised standards do not include additions or amendments that should have a detrimental impact on someone based on their sex/gender.</p> <p>The following new standard in the Standards for Optical Businesses may have a positive impact on female registrants in particular:</p> <p><b>“Provide support for staff who have experienced discrimination, bullying, or harassment in the workplace.”</b></p>

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
		<p>We know from our registrant survey that female registrants are more likely to experience discrimination, bullying and harassment, so the addition of this standard will contribute to improved support for those registrants.</p> <p>As above, the revisions to standard 13 relating to behaviour between colleagues should have a positive impact across all protected characteristics. The revisions to standard 15 deal specifically with the issue of sexual misconduct.</p> <p>The consultation did not identify any additional impacts on individuals based on their sex. Respondents expressed an expectation that the new standards will benefit certain groups, particularly women in relation to the standard on sexual boundaries.</p>
Gender reassignment (trans and non-binary)	Positive	<p>The revised standards do not include additions or amendments that should impact someone based on their gender reassignment or trans status.</p> <p>As above, the revisions to standard 13 relating to behaviour between colleagues should have a positive impact across all protected characteristics.</p> <p>The consultation did not identify any additional impacts on individuals based on gender reassignment.</p>
Marriage and civil partnership	Positive	<p>The revised standards do not include additions or amendments that should impact someone because of their marital status, regardless of whether it is a same-sex marriage/civil partnership or an opposite-sex one.</p> <p>As above, the revisions to standard 13 relating to behaviour between colleagues should have a positive impact across all protected characteristics.</p> <p>The consultation did not identify any additional impacts on individuals based on marriage or civil partnership.</p>

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
Pregnancy/ maternity	Positive	<p>The only amendment or addition to the Standards which may affect those pregnant is the following requirement:</p> <p><b>“If you have a serious communicable disease, or have been exposed to a serious communicable disease, and believe you could be a carrier, you should not practise until you have sought appropriate medical advice. You must follow the medical advice received, which may include the need to suspend, or modify your practice and/or guidance on how to prevent transmission of the disease to others. For guidance on serious communicable diseases, refer to current public health guidance.”</b></p> <p>Pregnant people can experience periods of lower immunity throughout their pregnancy and will likely benefit from the practice of reducing the possibility of exposure to communicable diseases and find access to services safer.</p> <p>As above, the revisions to standard 13 relating to behaviour between colleagues should have a positive impact across all protected characteristics.</p> <p>The consultation did not identify any additional impacts on individuals based on pregnancy or maternity.</p>
Race	Positive	<p>The revised standards do not include additions or amendments that should have a detrimental impact on someone because of their race or ethnicity.</p> <p>The following new standard in the Standards for Optical Businesses may also have a positive impact on those from an ethnic minority background:</p> <p><b>“Provide support for staff who have experienced discrimination, bullying, or harassment in the workplace.”</b></p> <p>We know from our registrant survey that registrants from ethnic minority backgrounds were more likely to have experienced harassment, bullying or abuse specifically from managers, other</p>

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
		<p>colleagues, and tutors, lecturers or supervisors. Those from ethnic minority groups were also more likely to have experienced any discrimination, particularly those of Asian/Asian British ethnicity. The addition of this standard will contribute to improved support for those registrants.</p> <p>As above, the revisions to standard 13 relating to behaviour between colleagues should have a positive impact across all protected characteristics.</p> <p>The consultation did not identify any additional impacts on individuals based on race.</p>
Religion/belief	Positive	<p>The revised standards do not include additions or amendments that should impact someone based on their religion or beliefs, including the absence of either.</p> <p>As above, the revisions to standard 13 relating to behaviour between colleagues should have a positive impact across all protected characteristics.</p> <p>The consultation did not identify any additional impacts on individuals based on religion or belief.</p>
Sexual orientation	Positive	<p>The revised standards do not include additions or amendments that should impact someone because of their sexual orientation.</p> <p>As above, the revisions to standard 13 relating to behaviour between colleagues should have a positive impact across all protected characteristics.</p> <p>The consultation did not identify any additional impacts on individuals based on sexual orientation.</p>
Other groups (e.g. carers, people from different socio-	Neutral	<p><b>Different socio-economic groups</b></p> <p>The revised standards do not include additions or amendments that should impact someone because of their socio-economic background.</p>

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
economic groups)		The consultation did not identify any impact on individuals because of their socio-economic background
	Neutral	<p><b>Welsh language users</b></p> <p>The revised standards do not include additions or amendments that should impact someone because of their status as a Welsh language speaker or user.</p> <p>The consultation indicated that respondents view the publication of the standards in the Welsh language positively and acknowledge it is a) beneficial for Welsh speaking patients and practitioners, b) promotes equity between Welsh and non-Welsh speakers and c) facilitates reflection on and application of the standards in an individual's first/preferred language.</p>
	Positive	<p><b>Patients in vulnerable circumstances</b></p> <p>The revised standards include the following addition to the introduction:</p> <p><b>“Consider and respond to the needs of patients who, due to their personal circumstances, are in need of particular care, support or protection or at risk of abuse and neglect. Patients may be vulnerable for a range of reasons, including physical or mental health conditions, capability in managing their health, or handling a difficult set of life events. Levels of vulnerability may vary between contexts, and change over time, so consider a patient's vulnerabilities as part of each consultation”</b></p> <p>And the following revisions:</p> <p>“Conduct an adequate assessment for the purposes of the optical consultation, including where necessary any relevant medical, family and social history of the patient. This may include current symptoms, personal beliefs, cultural factors and <b>vulnerabilities</b>.”</p>

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
		<p>“Consider and respond to the needs of disabled patients, and <b>patients in vulnerable circumstances</b>, and make reasonable adjustments to your practice to accommodate these and improve access to optical care.”</p> <p>As outlined in the first addition, vulnerable people may require specific care, regardless of their protected characteristic status, and may be more at risk of abuse. These additions and amendments will work to ensure vulnerable people are better protected and receive better care.</p> <p>The consultation did not identify any additional impacts on individuals in vulnerable circumstances. Several respondents believe the standards will have a positive impact by raising awareness and potentially offering better protection for individuals with disabilities or vulnerabilities.</p>