

Annex One: Impact Screening Assessment

Name of policy or process	GOC registration process for international applicants
Purpose of policy or process	To consult on a proposed revised approach to managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, following the introduction of the GOC's updated education and training requirement.
Team/Department	Education Development
Date	25.01.23, updated 10.05.24
Screen undertaken by	Ben Pearson
Approved by	Andy Mackay-Sim, Head of Governance
Date approved	7 June 2023
Instructions:	<ul style="list-style-type: none"> • 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 your 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)	No budget is required OR budget has been allocated and it is unlikely more will be required	
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 and 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 and 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:

In 2022 the number of applicants who successfully joined the fully qualified register under the current non-UK route was 42. Although this may appear to be a small number, it is the highest number per annum over a five-year period.

We consulted on changing the GOC's current procedure for admitting international applicants to our register given the new ETR approved by the GOC Council in February 2021, focusing the consultation on proposed consequential changes to the management of applications from optical professionals qualified overseas to the GOC register.

We do not consider the revised approach to be high reputational risk as most, if not all, GOC stakeholders recognise the need to update our procedure for admitting international applicants so that it is in line with the ETR. The proposed approach contained in the consultation enables providers who are interested in designing, developing and seeking approval for GOC approved qualification which meets the needs of this group of applicants to respond in a flexible way to address the market demand, a demand that has increased substantially over the last few years. A full impact assessment was developed for the GOC's requirements for approved qualifications in optometry and dispensing optics and this approach uses the same ETR regulatory framework, albeit with a reduced financial impact, given that the fees charged by providers for international students/professionals are usually substantially higher than that charged for home students.

The consultation concerned proposed changes to a current GOC procedure as a result of implementing the ETR. Some but not all existing operational elements will need to change to meet the requirements of the revised procedure. The driver for change was the GOC's Education Strategic Review which produced the ETR and was subject to policy development, consultation, and risk analysis. Relevant documentation pertaining to this can be found on the [GOC's website](#).

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	

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:

The information handled was the consultation response data. All respondents were asked permission for anonymised personal data and responses to questions to be used. No individuals were identified in their responses, and all EDI information will be fully anonymised. All data was be processed and stored in line with our [information governance policies](#), and individuals will be provided with a privacy notice.

C) Human rights, equality and inclusion	High risk	Medium risk		Low risk	? or N/A
1. Main audience/policy user	Public			Registrants, employees or members	
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			No, the policy, process or activity does not restrict an individual's inclusion, interaction or participation in a process	
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	Yes, the decision is made by a representative panel (specifically selected) OR No, no decisions are required	N/A
	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	N/A
	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	N/A
	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	The decision-makers have received EDI and unconscious bias training within the last 12 months, which is recorded	N/A
4. 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	N/A

C) Human rights, equality and inclusion	High risk	Medium risk		Low risk	? or N/A
	months; and there is no further training planned			months, which is recorded	
5. 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	N/A
6. Venue where activity takes place	Building accessibility not considered	Building accessibility sometimes considered		Building accessibility always considered	
	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
7. 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
8. 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	
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	N/A

C) Human rights, equality and inclusion	High risk	Medium risk		Low risk	? or N/A
10. 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:

While the majority of respondents to the consultation did not identify any EDI impacts, there were several respondents who identified potential issues in response to quantitative questions including race, age and disability. We received a limited amount of qualitative feedback on EDI impact in respect of each protected characteristic. The feedback we did receive is noted in the explanation boxes below for each protected characteristic.

All optical professionals who have qualified outside the UK will need to demonstrate that they have met the outcomes as set out in the Education and Training Requirements (ETR) approved by Council in February 2021. We did not receive sufficient feedback to the consultation to be able to identify with precision, exactly what the EDI impact would be to meet this requirement. However, the key mitigating adjustment to our proposals - that is to have two alternative routes to registration as set out in the consultation response paper - will help to enhance the proportionality of our proposals by ensuring any protected groups impacted as a result of having to meet the requirements of the ETR will only need to carry out additional education and training required to meet the outcomes for registration.

Our QA processes will ensure providers are complying with the EDI standards in our ETR.

Just as the current process for admitting overseas optical professionals excludes individuals who are unable to meet our requirements, the new approach outlined in this paper does so on the grounds of protecting patients and the general public.

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
Age	Neutral	<p>A respondent noted that older professionals might find adapting to new educational and qualification requirements more challenging, mainly if they have been practising for a long time in a different jurisdiction. The key adjustment to our proposals following the closure of the consultation; that is to have two alternative routes to registration as set out in the consultation response paper; will help to enhance the proportionality of our proposals by ensuring any protected groups impacted as a result of having to meet the requirements of the ETR will only need to carry out additional education and training required to meet the outcomes for registration.</p> <p>The same respondent also noted that younger professionals who are more adaptable to newer technologies and educational formats might find it easier to navigate the requirements for registration, potentially benefiting them.</p>
Disability	Positive	<p>A respondent noted accessibility can be a concern for people with disabilities particularly in practical examinations or clinical training settings. The same respondent noted that if the GOC incorporates digital assessment and learning tools that adhere to best practices for accessibility, individuals with disabilities might find it easier to complete their qualifications.</p> <p>Any additional education and retraining required to meet the ETR will be managed by GOC approved providers of optical education and will take place in academic and healthcare settings relevant to the GOC's quality assurance regime as well as the GOC's standards for optical businesses. As part of this process, providers supply details of widening participation measures which include details of accessibility measures in place to accommodate individual needs. GOC approved providers must also be listed on one of the national frameworks for higher education qualifications for UK degree-awarding bodies (The Framework for Higher Education Qualifications of Degree-Awarding Bodies in England, Wales and Northern Ireland (FHEQ) and the Framework for Qualifications of Higher Education Institutions in Scotland (FQHEIS)), or be a qualification regulated by Ofqual, SQA or Qualifications Wales which have their own regulatory requirements.</p>

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
Sex	Positive	<p>A respondent noted that some healthcare settings can be discriminatory or not fully inclusive, affecting people who have undergone gender reassignment or may face gender discrimination. The same respondent also noted that mandatory training on inclusivity for evaluators would positively impact women and those who have undergone gender reassignment by fostering a more equitable assessment environment.</p> <p>Any additional education and retraining required to meet the ETR will be managed by GOC approved providers of optical education and will take place in academic and healthcare settings relevant to the GOC's quality assurance regime as well as the GOC's standards for optical businesses. GOC approved providers must also be listed on one of the national frameworks for higher education qualifications for UK degree-awarding bodies (The Framework for Higher Education Qualifications of Degree-Awarding Bodies in England, Wales and Northern Ireland (FHEQ) and the Framework for Qualifications of Higher Education Institutions in Scotland (FQHEIS)), or be a qualification regulated by Ofqual, SQA or Qualifications Wales which have their own regulatory requirements.</p>
Gender reassignment (trans and non-binary)	Positive	As above
Marriage and civil partnership	Neutral	<p>A respondent noted that there could be issues of spousal sponsorship for visas or the availability of visas for partners, which might affect these individuals differently. Whilst optical professionals who qualified outside the UK may be affected by visa issues both now and in the future, these are a matter for the UK government rather than the GOC. Another respondent noted as a positive impact that for someone who has a partner in the UK, it provides the opportunity for the Optometrist/Optician to practice their profession while residing in the UK.</p>
Pregnancy/ maternity	Neutral	<p>A respondent noted that the length of programs and timing of examinations could have implications for those who are pregnant or have maternity needs, potentially disadvantaging them in the registration process. Any additional education and retraining required to meet</p>

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
		<p>the ETR will be managed by GOC approved providers of optical education and will take place in academic and healthcare settings relevant to the GOC's quality assurance regime as well as the GOC's standards for optical businesses. As part of this process, providers supply details of widening participation measures which include details of accessibility measures in place to accommodate individual needs. GOC approved providers must also be listed on one of the national frameworks for higher education qualifications for UK degree-awarding bodies (The Framework for Higher Education Qualifications of Degree-Awarding Bodies in England, Wales and Northern Ireland (FHEQ) and the Framework for Qualifications of Higher Education Institutions in Scotland (FQHEIS)), or be a qualification regulated by Ofqual, SQA or Qualifications Wales which have their own regulatory requirements.</p>
Race	Negative	<p>The profile of international applications indicates the approach is likely to have a greater impact on people from the Global Majority. This can be indicated in the number of applications from non-UK countries received between 2018-2022 which are as follows: Nigeria 387, India 84, Ghana 35, South Africa 34, Italy 32, Spain 31, Ireland 26, Romania 19, Pakistan 16, Greece 14. The GOC will commission analysis (publicly accessible guidance) that maps qualifications in certain overseas countries against the ETR. This means that qualifications in those countries will have been evaluated on a fair basis although this may result in a discriminatory effect for those who are required to undertake additional education and training which will involve additional costs. However, we have sought to mitigate this requirement by ensuring additional education and training is proportionate to meeting the outcomes for registration.</p>
Religion/belief	Neutral	<p>A respondent noted that training and examination schedules could conflict with religious observances, disadvantaging specific individuals. The same respondent noted that providing flexibility in exam schedules to accommodate religious observances would positively impact individuals of specific faiths. Any additional education and retraining required to meet the ETR will be managed by GOC approved providers of optical education and will take place in academic and healthcare settings relevant to the GOC's quality assurance regime as well as the GOC's standards for optical businesses. As part of this process, providers supply details</p>

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
		of widening participation measures which include details of accessibility measures in place to accommodate individual needs which include accommodating religion and beliefs. GOC approved providers must also be listed on one of the national frameworks for higher education qualifications for UK degree-awarding bodies (The Framework for Higher Education Qualifications of Degree-Awarding Bodies in England, Wales and Northern Ireland (FHEQ) and the Framework for Qualifications of Higher Education Institutions in Scotland (FQHEIS)), or be a qualification regulated by Ofqual, SQA or Qualifications Wales which have their own regulatory requirements.
Sexual orientation	Positive	None identified that are specific to these proposals. Any additional education and retraining required to meet the ETR will be managed by GOC approved providers of optical education and will take place in academic and healthcare settings relevant to the GOC's quality assurance regime as well as the GOC's standards for optical businesses. GOC approved providers must also be listed on one of the national frameworks for higher education qualifications for UK degree-awarding bodies (The Framework for Higher Education Qualifications of Degree-Awarding Bodies in England, Wales and Northern Ireland (FHEQ) and the Framework for Qualifications of Higher Education Institutions in Scotland (FQHEIS)), or be a qualification regulated by Ofqual, SQA or Qualifications Wales which have their own regulatory requirements.
Other groups (e.g. carers, people from different socio-economic groups)	Neutral	We received a comment which said there may be unintentional biases in the evaluation of qualifications from specific non-UK regions. However, we have considered the importance of a fair evaluation process by proposing to commission analysis (publicly accessible guidance) that maps qualifications in certain overseas countries against the ETR. It was noted that the impact on the overall quality and diversity of the optometry workforce in the UK may benefit from international perspectives, and that it is possible that migrants and refugees may be impacted positively if support to navigate the approach improves clarity, or reduces delays or costs. The commissioning of analysis mapping qualifications in certain overseas countries against the ETR will require interested organisation(s) to submit a proposal which we expect to include details of the methodology used to assess qualifications thereby mitigating the potential for unconscious bias.

