

## Non-EEA route to registration for optometrists: Equality impact assessment

Human rights, equality and inclusion	High risk	Medium risk	Medium risk	Low risk	? or N/A
Main audience/policy user	Public		X	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			<b>No, the policy, process or activity does not restrict an individual's inclusion, interaction or participation in a process</b>	
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)</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>	
	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	<b>There is a clear process to appeal to have the outcome internally reviewed and independently reviewed</b>	

Human rights, equality and inclusion	High risk	Medium risk	Medium risk	Low risk	? or 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	<b>The decision-makers have received EDI and unconscious bias training within the last 12 months, which is recorded</b>	
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>	
Alternative forms – electronic / written available?	No alternative formats available – just one option	<b>Yes, primarily internet/computer-based but paper versions can be used</b>		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		<b>Building accessibility always considered</b>	
	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		<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/contribute remotely</b>	

Human rights, equality and inclusion	High risk	Medium risk	Medium risk	Low risk	? or 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	
	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)	
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		Applicants are required to pay for their own expenses. Non-UK assessors are covered by our expenses policy	
Fair for individual's needs	Contact not listed to discuss reasonable adjustments, employees not aware of reasonable adjustment advisors	<b>Most employees know who to contact with queries about reasonable adjustments</b>		Contact listed for reasonable adjustment discussion	
Consultation and Inclusion	No consultation; consultation with internal employees only	Consultation with employees and members	<b>Consultation with employees, members, and wider groups</b>	Consultation with all relevant stakeholders (internal and external)	

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

- The main audience is the wider optical sector (potential applicants, employers, professional bodies and educational providers, but low impact on these stakeholders). We have discussed the proposals with the College of Optometrists.
- The proposed changes will result in a closer alignment to the existing requirements our UK registrants must meet through their training. Therefore, we propose that the changes will lead to better outcomes for the public with greater assurance with regards to patient safety.
- We will use internal non-UK assessors to develop the mapping process and interview with the applicant – these assessors receive regular training and have undergone unconscious bias training. We will need to be particularly aware of unconscious bias during the mapping process and interview as applicants' names will be on the documentation. Having more than one assessor to make the recommendation to the GOC at each stage of the process will help to manage any unconscious bias. Regular quality assurance by GOC staff and a working group will also help to manage this.
- Applicants who undergo training in the UK will enter the UK system of education. The educational providers will have their own requirements in relation to EDI and are quality assured by the GOC through its visiting programme.
- The College of Optometrists manage the Scheme for Registration and will have EDI policies to protect the applicants including reasonable adjustments (<https://www.college-optometrists.org/qualifying/scheme-for-registration/reasonable-adjustments.html>). Their assessors and examiners receive regular training in EDI.
- The previous non-EEA process meant that applicants had to undergo College examinations at only two points of the year. The Scheme for Registration has more frequent workplace-based assessments and examinations, thereby promoting flexibility and allowing individuals to plan around their existing, work, personal, social or religious commitments.

#### **Equality impact assessment**

- Age: The application form will request the applicant's date of birth for monitoring and identification purposes. We consider that the process does not adversely impact upon any particular age, although it should be noted that applicants will be required to complete a minimum of one year's unsupervised practice post-qualification – this is relevant to all applicants, whatever their age.
- Disability: The application form will request information about any disabilities, as is the case with UK applicants. We will use this information to consider whether any reasonable adjustments might be required for the purposes of the applicant's interview or during any further training that might be required. We will also pass this information on to the College of

Optometrists so that they can consider this during any workplace-based assessments or examinations for the Scheme for Registration (<https://www.college-optometrists.org/qualifying/scheme-for-registration/reasonable-adjustments.html>). It will be for the applicant to find a suitable workplace to undertake the Scheme for Registration.

- Gender reassignment: We do not intend to collect this information on the application form. We consider that the process does not adversely impact on anyone who has undergone or is undergoing gender reassignment.
- Marriage and civil partnership: We do not intend to collect this information on the application form. We consider that the process does not adversely impact on anyone in respect of marital or civil partnership status.
- Pregnancy and maternity: We do not intend to collect this information on the application form. Any applicant who is pregnant or on maternity leave during the application process will need to decide at which stage they wish to undertake the interview, further training and/or the Scheme for Registration. We will need to consider writing into the process how long each decision is valid for, and take into account circumstances such as pregnancy and maternity leave.
- Race (including colour, nationality, ethnicity or national origin):
  - We will map the qualifications and experience of all applicants against the UK standards of competence as a first step. However, it is likely that there will be certain countries where the education is at or above the same level as the UK standard, meaning that an applicant who has qualified and worked in that country would be more likely to progress to the next stage than an applicant who has qualified in another country. Our process will require our assessors to consider each case on its merits and there will be no automatic progression based on country of qualification – it will be dependent on the qualifications and experience of each individual applicant.
  - Our process will require applicants to demonstrate that they meet a certain standard of English through completion of an English language qualification.
- Religion or belief: We do not intend to collect this information on the application form. We consider that the process does not adversely impact on anyone of a particular religion or belief. In terms of religious holidays, we will seek to hold the interview with the applicant at a time convenient for the applicant and our assessors. Any further training will be arranged by the applicant and any education provider would have policies to ensure that religious holidays are taken into account during lesson and assessment/examination time. This is also the case with the College of Optometrists' Scheme for Registration.
- Sex: The application form will request the applicant's sex for monitoring and identification purposes. We consider that the process does not adversely impact upon any particular sex.

- Sexual orientation: We do not intend to collect this information on the application form. We consider that the process does not adversely impact on anyone in respect of their sexual orientation.

### **Financial impact on potential applicants**

- An applicant will be required to pay a scrutiny fee of £110 at the start of their application, with an equivalency assessment charged at £405 (and we propose to introduce a fee for the interview of £200).
- An applicant who is required to undergo further training to meet the UK standards of competence will be expected to fund this. This might make the cost of entering the UK register too great for some UK applicants, but it would not be appropriate for the GOC to fund non-EEA applicants. Applicants have the option of finding sponsorship from an employer.
- An applicant who enters the College of Optometrists' Scheme for Registration will be expected to fund this. Current fees for the full Scheme are £3,645 to be paid in two instalments – this covers up to four stage 1 work-based assessment visits, one stage 2 work-based assessment visit and one attempt at the final assessment (additional/missed stage 1/2 assessment visits are currently charged at £255-435 each and a re-attempt of the final assessment is charged at £610).
- Prior to the new process, the College of Optometrists' non-EEA examination cost was £200 for a logbook assessment and £2,300 for the full examination (£330 per re-sit of each section).
- The cost of the Scheme for Registration may be off-putting to some applicants. However, we understand that funding for the Scheme for Registration is often paid for by an employer who sponsors the applicant, so it may be that even though the fee is higher than the previous non-EEA examination, applicants may be able to find funding from an external source.
- Upon successful completion of the Scheme for Registration, the applicant will have to pay a fee of £340 to enter the UK register (and an annual renewal fee of £340 to remain on the register).