Impact Assessment Screening Tool

Name of policy or process	Statement on testing of sight
Purpose of policy or process	To set out the GOC's position on testing of sight
Team/Department	Policy and Standards
Date	22 December 2025; updated 13 April and 7 May 2026
Screen undertaken by	Marie Bunby and Toby Ganley
Approved by	Charlotte Urwin
Date approved	15 May 2026
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 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	N/A
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:
5: The topic of technology related to sight testing has had some media interest in the last 12 months and we expect this to continue as methods of service delivery evolve alongside developments in technology. We are mitigating this risk through ongoing discussion and engagement with stakeholders so that they are aware of our plans and have an opportunity to comment through the public consultation process. 8: We have prepared a full communications plan to support consultation engagement which will be completed when we are able to determine timescales. The consultation document and annexes will be translated into Welsh. The proposals in this document relate to an updated version of our existing 2013 statement on testing of sight to reflect the current position in relation to pre-/post-screening activities and separation of the sight test by time, person and/or place. It will apply to any formats of sight tests that fall within UK regulation. We have assessed that these proposals will not have any effects on opportunities to use the Welsh language or affect the treatment of the Welsh language. The risks identified in this section are low and medium risks. They have been addressed as far as possible and 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	Private / closed business data	Confidential / open business data	N/A
2. Will the data be anonymised?	No	Sometimes, in shared documents	Yes, immediately, and the original retained	Yes, immediately, and the original deleted	N/A
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	N/A
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	N/A
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	N/A
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	N/A
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	N/A
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	N/A
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.	N/A
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	N/A
11. Will data be handled by anyone outside the EU?	Yes	-	-	No	N/A
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	N/A

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	N/A

Please put commentary below about reasons for information governance ratings:
1-13: This proposal does not involve the collection or processing of personal data as part of its core function. The consultation proposals do not involve us collecting data – it is not a policy or process that involves applications – rather it is a proposed updated position statement and proposed revised standards for our registrants, therefore much of this section is not applicable. Responses to the consultation itself will be unlikely to provide personal data about individuals but they may provide information about businesses and their commercial practices. In line with our consultation policy, we will redact information which we consider to be offensive, vexatious, libellous or contain rhetoric that promotes discriminatory behaviour/views against anyone with protected characteristics under the Equality Act 2010, or are irrelevant (consultation-policy-final-july-2024.pdf (optical.org)). Consultation respondents can provide their personal information (name, contact details and EDI information) when submitting a consultation response, but it is not mandatory. Where gathered, all such information is used solely for the purposes of analysing responses and we do not identify or publish the names of any individuals who have responded to the consultation. Our consultation platform includes a privacy statement, setting out how we will use respondents' data (Privacy Policy | General Optical Council). Most risks are low or medium and have been mitigated. Full impact assessment not required.

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

C) Human rights, equality and inclusion	High risk	Medium risk		Low risk	? or N/A
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.		Over 80% of those involved have received EDI training in the last 12 months, which is recorded	N/A
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	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
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	N/A

C) Human rights, equality and inclusion	High risk	Medium risk		Low risk	? or N/A
				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
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:
3-9: The proposed updated statement and proposed revised standards do not include decision-making which gives outcomes for individuals, therefore much of this section is not applicable. Any direct impact at this stage will therefore be limited. Potential future impact will depend on how care is implemented in practice by businesses. The consultation approach is designed to support inclusive participation through availability of documents in alternative formats on request, open access through our website, and multiple response routes. Any decisions on the content of the final statement will be made at a public Council meeting which take place online and are open to all to attend. We publish Council papers a week in advance of meetings. Full impact assessment not required.

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
Age	Positive	These proposals will result in safeguards being put in place by optical businesses operating sight tests that are separated by time, person and/or place. It includes guidance on having documented protocols and service specifications for how the format should be operated,

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
		including how to assess whether any patients would not be suitable for the format of sight test due to their clinical risk. This is likely to protect patients in the older age group, as our research[1] shows that they fall into the category of a higher risk patient and are therefore a) less likely to be suitable for such a sight test format by virtue of their age and b) more likely to have pre-existing eye conditions.
Disability	Positive	Our public perceptions research shows that people with a disability are more likely to experience something going wrong during a visit to the opticians/optometrist practice. Having documented protocols and service specifications for how a sight test separated by time, person and/or place should be operated is likely to have a positive impact on those with a disability, as it will ensure that the format is suitable for patients being offered it, as well as ensuring that the patient is aware of the format prior to the appointment so that they can exercise choice and informed consent (or otherwise).
Sex	Neutral	No specific differential impacts have been identified at this stage, although this will be kept under review as formats of sight test evolve.
Gender reassignment (trans and non-binary)	Neutral	No specific differential impacts have been identified at this stage, although this will be kept under review as formats of sight test evolve.
Marriage and civil partnership	Neutral	No specific differential impacts have been identified at this stage, although this will be kept under review as formats of sight test evolve.

[1] Jonuscheit, S. et al. (2025), 'Testing of sight - a risk-based framework: Project report'

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
Pregnancy/ maternity	Neutral	No specific differential impacts have been identified at this stage, although this will be kept under review as formats of sight test evolve.
Race	Neutral	No specific differential impacts have been identified at this stage, although this will be kept under review as formats of sight test evolve.
Religion/belief	Neutral	No specific differential impacts have been identified at this stage, although this will be kept under review as formats of sight test evolve.
Sexual orientation	Neutral	No specific differential impacts have been identified at this stage, although this will be kept under review as formats of sight test evolve.
Other groups (e.g. carers, people from different socio-economic groups)	Positive	Testing of sight separated by time, person and/or place (e.g. remote sight testing using teleoptometry) and providing for remote supervision, are likely to be positive for people based in rural or remote areas where recruitment of optometrists can be challenging. This may improve accessibility of care and therefore earlier detection of sight-threatening conditions. It should also be noted that some individuals may experience overlapping impacts (for example, older people with disabilities or those experiencing socio-economic disadvantage), which may not be fully captured when considering characteristics individually.