

Consultation 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 requirements

Section One

Overview

- 1.1 The General Optical Council (GOC) is the regulator for the optical professions in the United Kingdom (UK). We currently register around 33,000 optometrists, dispensing opticians, students and optical businesses.
- 1.2 We have four core functions:
 - setting standards for optical education and training, performance and conduct;
 - approving qualifications leading to registration;
 - maintaining a register of individuals who are qualified and fit to practise, train or carry on business as optometrists and dispensing opticians; and
 - investigating and acting where registrants' fitness to practise, train or carry on business is impaired.
- 1.3 The GOC's overarching objective is the protection of the public. One of our main functions is to approve qualifications in optometry and dispensing optics leading to entry to the register, and to ensure that optical professionals who have qualified outside the UK or Switzerland¹ who wish to join the GOC's register meet the same standards as optical professionals who have qualified in the UK.

¹ Not applicable to Swiss optical professionals who started their optical qualification programme after EU exit day (31 January 2020). Swiss optical professionals who were formally recognised as such before EU exit day or were in the process of completing their optical qualification in Switzerland on EU exit day must register with the GOC by 31 December 2024 to be processed in accordance with the GOC's procedures for registering Swiss optical professionals before EU exit day as part of a four-year 'grace period' stipulated under the 2018 [Swiss Citizen's Rights Agreement](#) (SCR) (notwithstanding the GOC's right to adapt those procedures to ensure they align with the GOC's Education and Training Requirements). From January 2025 [the UK-Switzerland Recognition of Professional Qualifications Agreement of June 2023](#) will apply to Swiss optical professionals wishing to register with the GOC.

Why we are consulting?

- 1.4 The process for managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland needs to be updated following the approval in February 2021 of new education and training requirements (ETR) for GOC approved qualifications leading to registration as an optometrist or a dispensing optician. The ETR include new 'Outcomes for Registration' which dispensing opticians and optometrists will have to meet in order to qualify and join the register. You can read our new ETR [here](#).
- 1.5 The updated ETR has replaced our current Quality Assurance Handbooks for optometry (2015) and ophthalmic dispensing (2011) for qualifications we approve. It will also require changes to the way we manage applications to the GOC register for optical professionals who have qualified outside the UK or Switzerland. This is because optical professionals who have qualified outside the UK or Switzerland who wish to join the GOC's register must meet the same standards of education and training as optical professionals who have qualified in the UK.

What will our proposals replace?

- 1.6 At present, optical professionals who have qualified outside the UK or Switzerland applying to join the GOC register are assessed by us against our handbook requirements (Quality Assurance Handbooks for optometry (2015) and ophthalmic dispensing (2011)). If that assessment is successful, applicants then go on to undertake either the College of Optometrist's Scheme for Registration (for optometrists) or ABDO's examinations (for dispensing opticians).
- 1.7 Now that our two quality assurance handbooks have been replaced by our new ETR, we need to consult on how we might manage applications to the GOC register for optical professionals who have qualified outside the UK or Switzerland, and how we might assess whether they meet our updated 'Outcomes for Registration' for optometry and dispensing optics.
- 1.8 This is particularly important for optometrists who have qualified outside the UK or Switzerland. At present most optometrists who have qualified outside the UK or Switzerland, following an assessment by us, undertake the College of Optometrist's Scheme for Registration. In future, once GOC approved qualifications in the UK have adapted to meet the updated ETR and students studying on existing GOC approved qualifications have joined the GOC register, the College of Optometrist's Scheme for Registration will cease, and will not be available for international applicants to utilise.

- 1.9 You can read how our current international registration process works for [optometrists](#) and [dispensing opticians](#) who have qualified outside of the UK on our [website](#). The application process for Swiss nationals can be found [here](#). In this consultation we propose that the management of the checks the GOC registration team currently undertake will change (checks such as an applicant's levels of training, experience, registration with their own country's regulator, and English language testing) as will the assessment of an applicant's prior qualifications and experience by our independent assessors.

How many international applications does GOC receive year each?

- 1.10 A summary of the number of applications to the GOC register from optical professionals who have qualified outside the UK or Switzerland, as well as the numbers of applicants admitted, and their country of qualification is published in a briefing document alongside this consultation on our Consultation Hub. Most of the optical professionals who have qualified outside the UK or Switzerland and applying to join the GOC register are optometrists. Very few are dispensing opticians.
- 1.11 The volume of applications from overseas qualified professionals is increasing. In the 2022 calendar year we received 350 applications; so far, 42 individuals have joined the register and 28 were assigned for assessment, as compared to 103 applications in 2019, with 27 individuals joining the register and 42 assigned for assessment². Once an applicant has submitted an application, it can take over a year for them to complete the College of Optometrist's Scheme for Registration, or ABDO's Examinations, and register with the GOC. Even so, the small proportion of applications assigned for assessment compared to the total number of applications received indicates that many of the initial applications we receive do not meet our threshold for further consideration. Also of note, in 2022 all but ten applications were from non-European Economic Area (EEA) countries. Prior to the UK exiting the European Union most applications to the GOC register from optical professionals who had qualified overseas were from optical professionals from EEA countries.
- 1.12 We are aware that some optical businesses are recruiting optical professionals who have qualified overseas to work in the UK. We understand that this helps to address reported workforce shortages and helps to ensure that optical healthcare is available when it is needed most. While maintaining standards is our paramount consideration, we also recognise the importance of ensuring our regulatory

² Note that overseas applicants are not able to join in the register in same year they applied, because the Scheme for Registration is a mandatory process they need to undertake.

approach is proportionate and that our registration processes meet employer and workforce need.

What are we not consulting on?

- 1.13 This consultation is not seeking views and evidence of impact (positive or negative) on the GOC's updated ETR; this consultation only seeks views on how we might manage future applications to the register from optical professionals who have qualified outside the UK or Switzerland.
- 1.14 The proposal is that all applications for international registration from the agreed implementation date (September 2026 – see paragraphs 2.18 to 2.19) will be assessed against the relevant ETR.

GOC Approved Qualifications – non-UK providers

- 1.15 This consultation is not seeking views on the process by which the GOC may receive and assess an application for qualification approval by a prospective qualification provider based overseas. We call these 'non-UK providers.' A non-UK provider may be a UK qualification provider (such as a university) offering a GOC approved qualification at a campus or institution overseas, or a non-UK institution (such as an overseas university) who wishes to offer a GOC approved qualification overseas. At present there are no 'non-UK providers' offering GOC approved qualifications.
- 1.16 Providers, and prospective providers, of GOC approved qualifications whether delivered in the UK or overseas, must meet our updated ETR in accordance with our quality assurance and approval processes. Successful graduates of GOC approved qualifications are eligible for direct entry to the GOC register. This includes graduates from GOC approved qualifications delivered by non-UK providers, should we ever approve such qualifications.
- 1.17 The proposed approach to managing applications to the register from optical professionals who have qualified overseas, described in our consultation in section two, will therefore NOT apply to successful graduates of GOC approved qualifications delivered by non-UK providers.
- 1.18 Please note that our new Quality Assurance and Enhancement Method (QA&EM) agreed by Council in February 2021 ensures that the costs of any of our quality assurance and approval activity in relation to non-UK qualification approval is recovered in full from the qualification provider.

Unilateral/bilateral registration agreements

- 1.19 The Professional Qualifications Act 2022 revoked the previous system for recognising overseas qualifications, based on EU rules. The Act provides powers to enable regulators such as the GOC to conclude recognition agreements with their overseas counterparts. Under the legislation regulators' autonomy is protected in relation to determining entry requirements for a profession and assessing whether individuals are fit to practise.
- 1.20 At present the GOC does not have any plans to negotiate any unilateral/bilateral registration agreements. Should, however, any unilateral/bilateral registration agreements be agreed by GOC, and depending on the terms of that agreement, the proposed approach described in section two for managing applications to the register may not apply.
- 1.21 It has been suggested that overseas qualifications in some jurisdictions, such as parts of North America, Australasia and some Nordic countries, are comparable to UK qualifications under the ETR. The volume of applications for registration from optical professionals qualified in these jurisdictions is very low. However, it is possible that demand is suppressed because the GOC's processes for managing applications from optical professionals qualified overseas requirements are perceived as difficult to navigate.
- 1.22 As part of this consultation, we would be interested in views and evidence of overseas qualifications that may be broadly equivalent to UK qualifications under the ETR.

The consultation

- 1.23 We would like to hear your views on the proposed revised approach described in Section 2 of this consultation paper, and our draft assessment of impact and cost benefit analysis published alongside the consultation.
- 1.24 The consultation will last for a period of 12 weeks closing at 11.59pm on Wednesday 4 October 2023.

Relevant documents

- 1.25 Related documents include the Opticians Act 1989 and the Requirements for Approved Qualifications in Optometry and Dispensing Optics.

Section two

2.1 In this section we describe our 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 ETR.

Proposed revised approach to managing applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland

2.2 The approach for the future management of the assessment of applicants who have qualified overseas can be summarised as:

1: The applicant successfully completes and is awarded a GOC approved qualification in either dispensing optics or optometry.

[NOTE: The provider of the approved qualification will be responsible for the decision to admit an applicant or not; including any assessment of prior learning and experience (advance standing) with reference to publicly accessible guidance, such as guidance produced by the optical sector on geographic equivalence.]

2: The GOC will no longer undertake individual registration assessments prior to an applicant applying to be admitted to a GOC approved qualification.

3. The GOC may continue to assess applications for registration from optical professionals who have qualified outside the UK or Switzerland who meet or exceed the requirements for GOC registration (including the relevant ‘outcomes for registration’).

[NOTE: We expect such applications to be rare (less than 10 a year). We will continue to charge a fee for this assessment.]

2.3 Provided an overseas applicant has met the ETR by successfully completing a GOC approved qualification in either dispensing optics or optometry, they will then be eligible to join the register in the normal way. We expect almost all applications for registration from optical professionals who have qualified outside the UK or Switzerland to be managed this way.

2.4 The success of this approach will depend upon the willingness of education and training providers (“providers”) to offer qualifications in either dispensing optics or optometry that meet the needs of applicants who have already qualified overseas. For some providers, this could mean adapting existing GOC-approved qualifications

to meet the needs of applicants qualified overseas. For other providers, it could mean designing and applying for GOC approval of a new qualification that meets the needs of applicants who have already qualified overseas.

- 2.5 In designing a qualification suitable for optical professionals who have qualified overseas, providers will need to meet all the ETR requirements. This includes:
- a. The requirement for a qualification to be either a regulated qualification or a qualification listed on one of the national frameworks for higher education qualifications for UK degree-awarding bodies (see 'Standards for Approved Qualifications', S3.12);
 - b. For an approved qualification in optometry, it must be at a minimum RQF, FHEQ or CQF level 7 or SCQF/FQHEIS level 11. For an approved qualification in dispensing optics, it must be at a minimum RQF, FHEQ or CQF level 6 or SCQF/FQHEIS level 9 or 10 (see S3.12);
 - c. The approved qualification must integrate at least 1600 hours/ 48 weeks of patient-facing learning and experience in practice (see S3.15);
 - d. Selection and admission criteria must include relevant health, character, fitness to train checks and evidence of proficiency in the English language (at least Level 7 overall (with no individual section lower than 6.5) on the International English Language Testing System (IELTS) scale or equivalent): (see S2.1); and
 - e. Recognition of prior learning (RPL – advanced standing) may be utilised to admit applicants at a point other than the start of a programme, (see S5.2).
- 2.6 In practical terms, the ETR gives providers considerable scope for providers to design flexible, inclusive qualifications that can meet the needs of applicants who have already qualified as an eye-care professional in another country. For example, a provider in England may choose to offer a 60-credit level 7 postgraduate certificate, which integrates assessment of the applicant's ability to meet the Outcomes for Registration for optometry with the required periods of professional and clinical experience.
- 2.7 In this approach, the provider will be solely responsible deciding whether to admit the optical professional to the approved qualification, and whether to offer advanced standing as a result of RPL, using publicly accessible guidance produced and maintained by the optical sector on territorial equivalence. This includes responsibility for ensuring that applicants can evidence proficiency in English language in accordance with S2.1. The provider will also be responsible for assessing if the optical professional has met the Outcomes for Registration leading to the award of the approved qualification.
- 2.8 The GOC will no longer undertake individual registration assessments prior to an applicant applying to be admitted to a GOC approved qualification.

- 2.9 However, the GOC will maintain a process for assessing applications for registration from optical professionals who have qualified outside the UK or Switzerland, for those applicants who consider they already meet the full requirements for GOC registration (the 'Outcomes for Registration.'). We expect such applications to be rare (less than 10 a year). We will continue to charge a fee for this assessment.
- 2.10 All GOC approved qualifications must meet the ETR. New or previously unapproved qualifications must seek GOC approval in accordance with the staged approach outlined in the quality assurance and enhancement method approved by Council in February 2021.
- 2.11 A diagram of routes to entry to the GOC register for optical professionals who have qualified overseas [may be viewed here](#).

Potential benefits

- 2.12 From a provider's perspective, the approach offers an opportunity to develop responsive and high-quality approved qualifications to meet a growing market need and for existing approved qualifications to meet the needs of international applicants in a flexible and proportionate way. The duration of such qualifications may be significantly shorter than those traditionally offered to students with no prior experience or qualifications in optics, and providers may benefit from the international perspectives and experience applicants will bring to the programme. In addition, providers may benefit financially from the fees they might charge for the approved qualification they offer to international applicants.³ Finally, all GOC approved qualifications must meet the ETR.
- 2.13 From an applicant's perspective, optical professionals who have qualified overseas may benefit from a greater choice of approved qualifications and potential competition on price, price certainty, and academic offer (for example, the opportunity to 'top up' an approved qualification, which might be a 120 credit PGDip, once qualified, to a 180 credit masters qualification, potentially incorporating an approved qualification in independent prescribing). Applicants' transition to practice in the UK may benefit from the periods of professional and clinical experience organised by providers as part of the approved qualification offer, and in relation to optometry, limit delays currently experienced by professional trainees from overseas due to the shortage of training places and adaptation opportunities. Applicants may also benefit from the infrastructure and support provided to international students by UK providers, such as universities with established international student support programmes.

³ As a guide, the average full-time fee per year for international optometry students is currently £18,000 per year and for international dispensing optics students (f/t) it is £14,700.

- 2.14 From an employer perspective, this approach may provide a straightforward method for employers to sponsor optical professionals who have already qualified overseas and who wish to undertake a GOC approved qualification in order to register with the GOC and work either as an optometrist or a dispensing optician in the UK. Notwithstanding the availability of visas, over which the GOC has no control, employers may be offered a greater choice of providers through which they may sponsor applicants' study, potentially offering greater time and cost certainty.
- 2.15 Applicants and their employers will benefit from applicants no longer having to undertake a GOC registration assessment prior to enrolling on a GOC approved qualification (such as the Scheme of Registration), with a consequential reduction in delays and costs associated with the current assessment process.
- 2.16 From the GOC's perspective, this approach will mean that, from September 2026, we will no longer offer individual registration assessments (except in very specific circumstances, as described above). Instead, the GOC will signpost optical professionals who have qualified overseas to GOC approved qualifications. The retained costs from the GOC perspective will be to provide information to optical professionals who have qualified overseas and their potential employers, and the costs incurred from additional quality assurance and approval activity.
- 2.17 Patient and public benefit is anticipated to be twofold. First, the assessment of optical professionals who have qualified overseas will now be made against requirements which are up-to-date, have been widely consulted upon, and reflect contemporary expectations for future optical professionals, as opposed to the current, aged, handbook requirements. Second, the more streamlined throughput of additional UK-registered optical professionals qualified to the same standard as UK trained optometrists and dispensing opticians will help meet anticipated patient demand and address reported workforce shortages.

Potential risks

- 2.18 The risks of this approach are:
- a. None or too few providers accept optical professionals who have qualified overseas onto their approved ETR qualification or develop and successfully apply for GOC approval for qualifications specially designed to meet this market need. If no provider chooses to meet this market demand, there will be no route to registration for overseas qualified applicants;
 - b. The costs (fees) of GOC approved qualifications for optical professionals who have qualified overseas are too high and are a disincentive to UK registration; and
 - c. Inconsistency between providers in their admissions decisions, which may be influenced by commercial considerations. However, the GOC's quality assurance processes would be a mitigation against this risk. As a further safeguard, in relation

to RPL we propose a requirement for providers to refer to benchmarking guidance produced by the optical sector.

2.19 The costs associated with this approach are:

- a. One off cost for providers of developing and seeking GOC approval of a qualification targeted at this market (if the provider chooses to do so);
- b. On-going costs to providers in the management and delivery of a GOC approved qualification, offset by fees charged to professional trainees from overseas;
- c. One off cost to optical professionals qualified overseas who wish to register in the UK, that of their tuition fee to the provider of the GOC approved qualification targeted at this market. In addition, professional trainees from overseas will have the cost of registering with the GOC as a student; the cost of any visa applications; and the costs of moving to and living in the UK, which might be offset by a salary or fees earned during any periods of professional and clinical experience or employer sponsorship;
- d. On-going costs for employers. First, potential costs of sponsoring an optical professional qualified overseas who wishes to work/register in the UK (which may offset the applicant's tuition fees; living costs and/or relocation costs.) Second, the potential ongoing costs (supervision, placement management and salary costs) incurred by employers offering periods of professional and clinical experience in practice to overseas qualified optical professionals undertaking a GOC approved qualification; and
- e. Costs to the GOC in terms of a reduction in income offset by potential savings; the costs of providing information to optical professionals who have qualified overseas and their potential employers; costs of maintaining a registration assessment; and the costs incurred from additional quality assurance and approval activity.

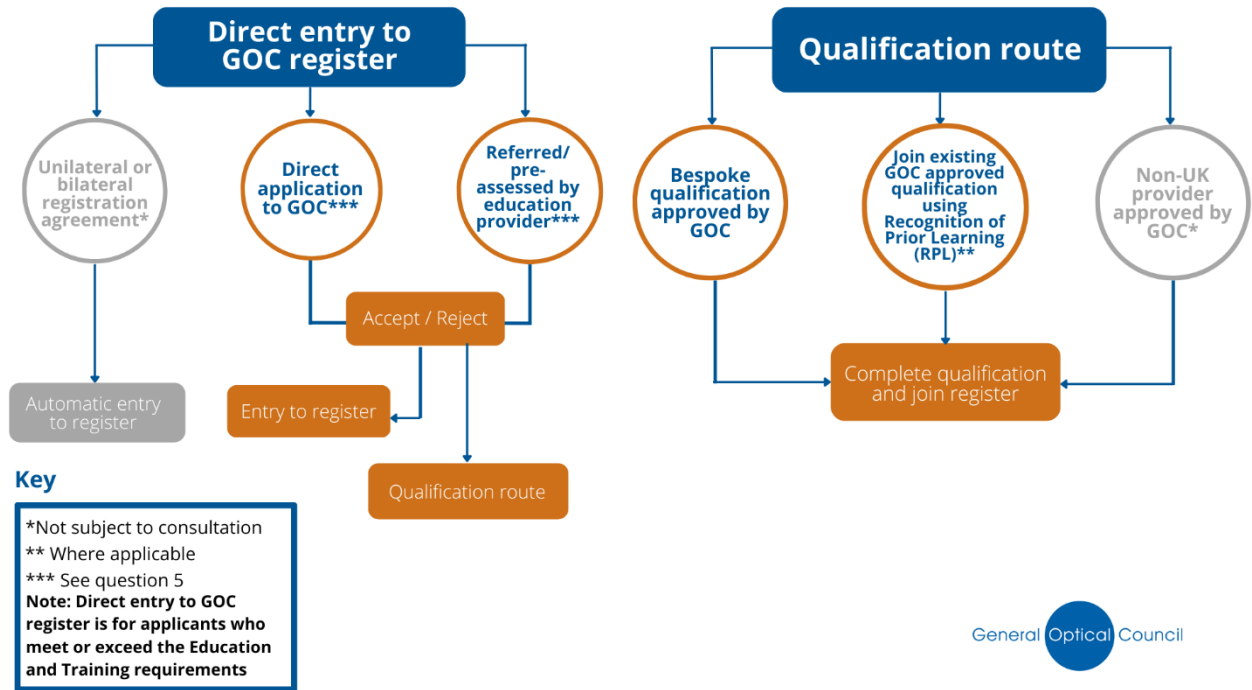
Proposed implementation and transitional arrangements

2.20 From September 2026 (or other date as agreed following the outcome of this consultation) optical professionals who have qualified outside the UK or Switzerland applying to the GOC register will need to meet the ETR, including the ['Outcomes for Registration' for dispensing optics and optometry](#).

2.21 While our proposed implementation date is September 2026, there are no regulatory barriers to providers applying for GOC approval of qualifications aimed at overseas applicants, and applications for qualification approval may be submitted at any time.

Figure 1:

Routes to GOC registration for overseas applicants



Questions

(Question numbers are different in the consultation hub to accommodate questions about respondents)

- 1. We are interested in your views and evidence on which overseas qualifications, if any, may be comparable to GOC approved qualifications in optometry or dispensing optics which meet the new ETR.**

Please identify which qualifications may be comparable and explain why.

- 2. Please consider proposals one and two described in section two of this consultation ([paragraph 2.2](#)).**

1: The applicant successfully completes and is awarded a GOC approved qualification in either dispensing optics or optometry.

2: The GOC will no longer undertake individual registration assessments prior to an applicant applying to be admitted to a GOC approved qualification.

Will these proposals have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland?

a) Positive b) Negative c) Neutral

Please explain why.

- 3. If your answer to Question 2 is 'negative', do you have an alternative proposal for 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 requirements?**

a) Yes b) No

Please provide further detail.

4. Please consider proposal three described in section two of this consultation ([paragraph 2.2](#)).

3. The GOC may continue to assess applications for registration from optical professionals who have qualified outside the UK or Switzerland who meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration').

[NOTE: We expect such applications to be rare (less than 10 a year). We will continue to charge a fee for this assessment.]

Will this proposal have a positive, neutral or negative impact on the management of applications for GOC registration from optical professionals who have qualified outside the UK or Switzerland, who are likely to meet or exceed the requirements for GOC registration (including the relevant 'outcomes for registration').

- a) Positive b) Negative c) Neutral

Please explain why.

5. Should such applications be pre-assessed by a provider of the approved qualification, or may optical professionals apply directly to the GOC?

- a) Pre-assessed by a provider of the approved qualification only
b) Direct application to the GOC only
c) The applicant may choose between either of the two routes above

Please explain why.

6. We want to understand whether the approach may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

- a) Age b) Disability c) Gender reassignment d) Marriage and civil partnership e) Pregnancy and maternity f) Race g) Religion or belief h) Sex i) Sexual orientation j) None of the above k) Don't know

Please describe the impact on the individuals or groups that you have ticked.

7. We also want to understand whether the approach may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010 which protects everyone living in the UK including refugees and migrants. Do you think the approach will have a positive impact on any individuals or groups who share any of the protected characteristics listed below? (Please select all that apply)

a) Age b) Disability c) Gender reassignment d) Marriage and civil partnership e) Pregnancy and maternity f) Race g) Religion or belief h) Sex i) Sexual orientation j) None of the above k) Don't know

Please describe the impact on the individuals or groups that you have ticked.

8. How do you think the approach will impact – positively or negatively – on any other individuals or groups (for example, students, patients and the public, current providers of approved qualifications, placement providers, employers and devolved nations)?

Positive Negative

a) Applicants from optical professionals who have qualified outside the UK or Switzerland
b) Patients and the public
c) Current and prospective providers of approved qualifications
d) Placement providers
e) Employers
d) Devolved Nations
e) Other – please specify

9. Have we identified and captured the impact accurately within the impact assessment (annex one)

a) Yes b) No

10. Are there other impacts (positive or negative) we should consider?

a) Yes b) No

Please provide further detail.

11. Is the proposed implementation date realistic (September 2026)?

a) Yes b) No c) Neutral

Please provide further detail.

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
Screen undertaken by	Ben Pearson
Approved by	Andy Spragg, 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:

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

The approach we are consulting on to change the GOC's current procedure for admitting international applicants to our register has low impact i) because the work to review the ETR through the Education Strategic Review has taken place, ii) the core eligibility requirements for international applicants are not changing, instead the consultation is focussed on the management of applications iii) the implementation of the ETR (including the development of relevant A&QA processes) which the approach relies on is already being developed and implemented, iv) support systems to help implement the ETR are in place (notably the Sector Strategic Implementation Steering Group (SSISG) and the Technical Advisory Group (TAG)), and v) the approach relies on the use of external resources to deliver the qualification and existing GOC A&QA resources.

Furthermore, we do not consider the 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 approach contained in this 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, which has increased substantially over the last few years. A full impact assessment has already been submitted 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 decreased financial impact, given that the fees charged by providers for international students/professionals are usually substantially higher than for home students.

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 will be consultation response data. All respondents will be asked permission for anonymised personal data and responses to questions to be used. No individuals will be identified in their responses, and all EDI information will be fully anonymised. All data will 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	?
	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 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	?
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	?

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	?
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	?
7. Attendance	Short notice of dates/places to attend	Medium notice (5-14 days) of dates/places to attend		Planned well in advance	?
	Change in arrangements is very often	Change in arrangements is quite often		Change in arrangements is rare	?
	Only can attend in person	Mostly required to attend in person		Able to attend remotely	?
	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)	?
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	?

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:

The consultation will help us to identify whether the approach will have a positive/negative/neutral impact.

Our QA processes would ensure providers are complying with the ED&I standards in our ETR.

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

The impact on a number of these areas are currently unknown and are to be confirmed pending the results of the consultation, and policy and process development.

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
Age	?	<p>Providers and prospective providers of GOC approved qualifications as set out in the proposed approach will be required to demonstrate an effective EDI policy as part of the GOC's quality assurance requirements.</p> <p>Currently, the impact on protected characteristics are unknown/unclear. Overseas applicants will have a range of protected characteristics, whilst we hope this approach will impact positively we aim to ascertain through consultation results and policy development.</p>

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
Disability	?	As above
Sex	?	As above
Gender reassignment (trans and non-binary)	?	As above
Marriage and civil partnership	?	As above
Pregnancy/ maternity	?	As above
Race	?	As above. The current profile of international applications indicates the approach will have a greater impact on people from specific ethnic backgrounds.
Religion/belief	?	As above. The current profile of international applications indicates the approach will have a greater impact on people holding specific religions or beliefs.
Sexual orientation	?	As above
Other groups (e.g. carers, people from different socio-economic groups)	Variable	We would need to explore with providers their arrangements for different socio-economic groups, should the proposed approach go ahead, in order to ascertain the impact on different socio-economic groups.

