**Impact Assessment Screening Tool**

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| **Name of policy or process:** | 1. Remote hearing protocol 2. Remote hearings – a guide to witnesses |
| **Purpose of policy or process:** | 1. To support the Fitness to Practise Committee hearing during the COVID-19 emergency 2. Introduces a witness to remote hearings, their obligations and how we plan to run them |
| **Team/Department:** | FTP |
| **Date:** | 8 July 2020 [updated 22 June 2021] |
| **Screen undertaken by:** | David Reeder |
| **Approved by:** | Dionne Spence |
| **Date approved:** | 13 July 2020 [23 June 2021] |

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| **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 you 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. |

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| **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 |  |
| 1. 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) | Budget has been allocated and it is unlikely more will be required | N/A |
| 1. 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 |  |
| 1. 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 |  |
| 1. Reputation & 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 |  |
| 1. Resources   (people & 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 |  |
| 1. 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 |
| 1. 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. |  |

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| Please put commentary below about your Impacts ratings above: |
| 2 – Budget: not required  3 – Legislation: we have temporary rule changes that allows the Hearings Manager to adjourn or cancel hearings. This will only be done on occasions where there is agreement between the parties. If parties disagree then the decision will be made by the adjudication committees. A separate policy is being developed about this and comments will be sought from key stakeholders in due course.  4 – Future legislation changes: our emergency powers expire on 1 October 2021 and our future position will be set out prior to this date.  5 – The GOC has been running remote hearings since March 2020 and the hearings protocol defines our processes to ensure consistency and increase transparency.  8 – Communications: a closed consultation was held with responses from the main representative bodies, PSA, committee members and legal advisers being received in June and November 2020. We made amendments based on these comments and created a summary of feedback document titled ‘we asked, you said, we did’. It has also been communicated to staff, our registrants and the wider optical sector. The Legal team has confirmed approval of the document and assisted with the drafting. A public consultation is being held for this amended protocol for 12 weeks commencing in late June 2021. The impact assessment will be reviewed after the consultation has closed and will be updated accordingly. |

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| **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 |  |
| 1. Will the data be anonymised? | No | Sometimes, in shared documents | Yes, immediately, and the original retained | Yes, immediately, and the original deleted. | N/A |
| 1. 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 |
| 1. 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 |
| 1. 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 |
| 1. 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 |
| 1. 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 |
| 1. 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 |
| 1. 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 |
| 1. 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 |
| 1. Will data be handled by anyone outside the EU? | Yes | - | - | No | N/A |
| 1. 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 |  |
| 1. 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 |

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| Please put commentary below about reasons for Information Governance ratings: |
| Most of these sections are not relevant as we will not be collecting data outside of our current scheduling processes. Both parties will continue to operate in same manner but confirm whether a remote hearing is acceptable. The Hearings questionnaire will also be amended to reflect the options of hearings available (remote, physically, blended or hybrid). No information governance training is therefore necessary.  Full impact assessment not required. |

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| **C) Human Rights, Equality and Inclusion** | **High Risk** | **Medium 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 a panel which is randomly selected; which may or may not review all cases. | Yes, the decision is made by a representative panel (specifically selected).  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 & unconscious bias training, and there are no plans for this in the next 3 months. | The decision-makers are due to receive EDI & unconscious bias training in the next 3 months, which is booked. | The decision-makers are not involved before receiving EDI & unconscious bias training. | The decision-makers have received EDI & 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 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. |  |
| 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 | 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 |  |
| 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. | 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). |  |
| 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 |  |
| 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. |  |

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| Please put commentary below for Human Rights, Equalities and Inclusion ratings above: |
| The documents will inform registrants of how the GOC intends to approach hearings as restrictions start to ease and parties will have the option to attend a hearing remotely or in person.  3 – Case by case decisions will be made in accordance with guidance and documented.  10 – Consultation and inclusion: public consultation to take place with specific targeted approach for participation from representative bodies, PSA, committee members and legal advisers. Amended protocol provides the registrant with more choice where no or minimal restrictions in place. Our protocol will be kept under review, and we will be reviewing the position with representative bodies in quarterly group meetings. Observers can attend remotely for both remote and physical hearings.  A full impact assessment is required. |

# Policy – Impact Assessment

# Step 1: Scoping the IA

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| **Name of the policy/function:** | **Service of documents and approach to hearings** |
| **Assessor:** | David Reeder |
| **Date IA completed:** | 8 July 2020 [updated 22 June 2021] |
| **Date of next IA review:** | Following public consultation |
| **Purpose of IA:** | To assess and manage the potential impact of the GOC listing matters for a remote hearing, with particular regard to fair process. |
| **Approver:** | Dionne Spence |
| **Date approved:** | 13 July 2020 [updated 23 June 2021] |

**Q1**. **Screening Assessment**

## Has a screening assessment been used to identify the potential relevant risks and impacts? Tick all that have been completed:

☐ Impactsa

☐ Information Governance (Privacy) a

☐ Human Rights, Equality & Inclusion a

~~☐ None have been completed~~

**Q2.About the policy, process or project**

## What are the main aims, purpose and outcomes of the policy or project?

## You should be clear about the policy proposal: what do you hope to achieve by it? Who will benefit from it?

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| **Aims:** The policy will provide service users with clarity about how the GOC will continue to fulfil its statutory function, specifically in relation to our ability to hold remote and physical hearings. |
| **Purpose and Outcome:**  Maximise participation and fairness, minimise delays and expense. |
| **Who will benefit:**  Public, registrants, complainants, witnesses and the GOC. |

**Q3. Activities or areas of risk or impact of the policy or process**

## Which aspects/activities of the policy are particularly relevant to impact or risk? At this stage you do not have to list possible impacts, just identify the areas.

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| **Activity/Aspect** |
| * The difference in scheduling approach between where there are no or only minimal restrictions in place, and if increased or enhanced government restrictions are in place. * The GOC’s reputation may be impacted by a perception that listing all non-substantive events to take place remotely will reduce engagement and that matters are not being considered on a case by case basis. This could have a larger effect on unrepresented registrants. * Although the GOC will follow this approach, the final decision on whether to proceed with a remote hearing rests with the FTPC. * There may be an impact on public protection if the GOC does not properly consider all aspects before listing a matter: agreeing an adjournment where a remote hearing could have been held, or listing a remote hearing where this could result in unfairness to a participant. The former could result in increased delays and higher costs, the latter in an unfair outcome and a successful appeal. |

**Q4. Gathering the evidence**

## List below available data and research that will be used to determine impact of the policy, project or process.

* Consider each part of the process or policy and identify where risks or implications might be found for: 1) Impacts; 2) Information Governance and Privacy implications; and 3) Human Rights, Equality and Inclusion.

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| **Available evidence – used to scope and identify impact** |
| The GOC have relied on responses from prior rapid consultations to formulate an approach to remote hearings as well as PSA guidance on remote hearings. Each matter will be assessed on a case by case basis with input from both sides to ensure that the needs of all participants are considered and the prompt and fair administration of justice administered.  We will be reviewing the protocol no later than 30 June 2022. |

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**Q5. Evidence gaps**

## Do you require further information to gauge the probability and/or extent of impact?

## Make sure you consider:

1. Impacts;
2. Information Governance and Privacy implications; and
3. Human Rights, Equality and Inclusion implications.

**If yes, note them here:**

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| Yes. As further government guidelines and advice are issued, we will review whether our approach remains fit for purpose. An internal review will also review the support we offer for remote hearings and whether we could do more. We aim to complete this review by the end of 2021. |

**Q6. Involvement and Consultation**

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| **Consultation has taken place, who with, when and how:**  There has been a limited consultation with the PSA, other regulators, hearing panellists, registrant representative and membership bodies and GOC staff for the original protocol and the November updated policy. A public consultation is being held for the most recent version and we will update this section. |
| **Summary of the feedback from consultation:**  So far, feedback has been largely positive.  Some issues have been raised which will need careful consideration by the Hearings team in how to list a remote hearing, and by FTPCs in deciding whether, and if so how, a remote hearing should take place. We have been specifically asked to consider the impact on:   * Registrants with limited hardware, e.g. smartphone but no laptop/ tablet (raised by AOP) * Emotional impact on registrants of their personal space being “tainted” by remote attendance from their home (by AOP) * Number of observers who should be permitted to view a remote hearing (raised by BLM) * Why decisions on applications to adjourn were being made by the Head of Hearings (raised by panellist) * FTPC may decline to proceed if we cannot demonstrate legal service (by Hearings) * Damaging relationships with registrants and panellists (by Legal) * Participants with visual impairment (by Registrar) * Participants with learning difficulties or other special needs (by Director) * Registrants who would have more confidence in the process if they can address a committee direct (by representatives) * Participants with limited WiFi bandwidth / unreliable internet (by defence bodies and Legal team) * Young or vulnerable witnesses (by Legal team) * Unrepresented registrants (defence bodies) * Lack of flexibility by stipulating that all non-substantive events could take place remotely (by Head of Hearings) * Further updates will be made following public consultation. |

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| **Link to any written record of the consultation to be published alongside this assessment:**  Attached to this document is our ‘We asked, You said, We did’ which summarises the feedback received as part of the previous consultations and what steps we took. |
| **How engagement with stakeholders will continue:**  Defence Stakeholder Group, Hearing Bulletin, Director communication and the GOC consultation platform. |

Step 2: Assess impact and opportunity to promote best practice

* Using the evidence you have gathered what if any impacts can be identified. Please use the table below to document your findings and the strand(s) affected.
* What can be done to remove or reduce any impact identified?
* Consider each part of the process or policy and identify where risks might be found for equality, human rights and information governance and privacy.
* Ensure any gaps found in Q5 are recorded as actions and considerations below.

Use the table below to document your strengthening actions (already in place or those to further explore or complete).

| **Activity/**  **Aspect** | **Potential/actual Impact** | **Strengthening actions to remove or reduce impact. For actions, include timeframes.** |
| --- | --- | --- |
| Emotional impact on registrants and/or other witnesses of their personal space being “tainted” by remote attendance from their home | The hearing may cause these participants lasting distress, or may make it more difficult for them to fully participate in the hearing process. | * The hearings officer to share any such advance concern with the committee chair or legal adviser. * The hearings officer to use a laptop or other large screen (especially if one or more panellist or the legal assessor is joining by smartphone), and is ready to suggest a break if a participant appears distressed during the hearing. * GOC to list with a longer time estimate, allowing time for more breaks. * In extreme cases, GOC to list the matter for a for the registrant/witnesses to attend the office (while maintaining social distancing). |
| Public access to the hearing | That there could be more members of the public wishing to view our hearings and become unmanageable. | * Enforce a maximum observer limit which replicates the environment at 10 Old Bailey. * Clear instructions to observers that the unauthorised recording of proceedings is strictly forbidden. |
| Agreed applications to adjourn being approved by Head of Hearings | When should decisions be taken by the Hearings Manager and when should they be taken by the FtPC. | * Statement amended to ‘may adjourn’ rather than ‘will adjourn’ to emphasise rarity. * All decisions will be recorded with reasons why agreed applications to adjourn are being approved. * Any applications which are not agreed will be sent to the FtPC to decide. |
| FTPC may decide not to proceed with a hearing | As we cannot demonstrate legal service which could result in wasted hearing costs. | * Provide evidence of service and receipt where possible. * Engage with defence bodies in terms of gaining consent for electronic service. * If registrant does not accept email service, then send by recorded delivery. |
| Damaging relationships with registrants/panellists | These groups may be less willing to follow GOC standards/guidance if we:  Do not comply with the legislation that we seek to enforce against them.  Do not record each non-compliance, with reasons, in the way that we require of them. | * If compliance is not possible, record the reasons why, and take alternative steps (e.g. send hearing notices by ordinary post and telephone the registrant/representative to check receipt). |
| Participants with visual impairment | They may find it more difficult to absorb information (written documents and facial expressions) on screen. | * The hearings officer to share any such advance concern with the committee chair or legal adviser, so the committee can arrange for relevant information to be read aloud. * GOC to allocate more than one hearings officer, so one officer can pay attention to non-verbal cues from such participants, and draw the committee chair’s attention to the need for information to be read aloud. * GOC to list with a longer time estimate, allowing time for reading aloud. * Where necessary, GOC to list the matter for a physical hearing. |
| Participants with learning difficulties or other special needs, or who find the proceedings particularly traumatic | They may find a remote hearing more isolating/ intimidating, making it more difficult for them to participate fully, and possibly reducing their confidence in the process. | * GOC's witness care manager to make advance enquiries of what additional support is needed (e.g. translator). * The hearings officer to share any such advance concern with the committee chair or legal adviser. * GOC to allocate more than one hearings officer. * GOC to list with a longer time estimate, allowing time for more breaks. * Where necessary, GOC to list the matter for a partially physical hearing. |
| Registrants or witnesses may have more confidence in the process if they can address a committee in person | There have been reports of witnesses in civil cases feeling “short-changed” since the decision-maker did not have to look them in the eye when delivering an unwelcome decision, and there could also be an impact on our participants’ confidence in the process. | * GOC to inform all participants in advance of arrangements for the remote hearing, allowing more time for the information to digested. * Hearings team to facilitate familiarisation sessions in advance of the hearing. * The hearings officer to share any advance concerns with the legal adviser, so they can assure the individual on the prevalence and accepted fairness of remote hearings. * Where necessary, GOC to list the matter for a full or partially physical hearing. |
| Participants’ limited WiFi bandwidth/ unreliable internet | The connection may be lost, potentially at a key moment. | * Hearings officer to pay particular attention to the number of participants, so they can alert the panel if someone has “dropped off”. * Witness calling letters and hearing notices to include a phone number for telephone participation. * Allow longer listing time, so any breaks do not cause the matter to be adjourned part-heard. * Test calls to be undertaken with all hearing participants. |
| Young, elderly or vulnerable witnesses | They may not have the technological wherewithal to feel comfortable giving evidence online, thus affecting fairness of proceedings and confidence in the process. | * GOC's witness care manager to make advance enquiries of what additional support is needed (e.g. testimony of complainant in sexual misconduct case, where a screen would have been needed). * The hearings officer to share any such advance concern with the committee chair or legal adviser (e.g. panel could consider asking registrant to use muted telephone rather than video-link during complainant’s testimony). * GOC to allocate more than one hearings officer. * GOC to list with a longer time estimate, allowing time for more breaks. * In extreme cases, GOC to list the matter for a (partially) physical hearing. |
| Loss of confidentiality e.g. participants discussing case with others during the hearing | If witness evidence is unduly influenced, the fairness of process could be affected, resulting in higher risk of appeal and reduced confidence in the GOC | * Committee guidance to highlight this risk and remind witnesses not to discuss their evidence under oath, and not to permit contact by third parties while they are testifying. * GOC to remind newly-appointed panellists, e.g. when allocating them to a remote hearing, of the need to ensure confidentiality during a hearing, especially a private hearing. |
| Registrant not being in the same room as adviser, and witness not being in the same room as supporter | If the registrant/ witness cannot consult their adviser/supporter as easily as passing a note during a hearing, there may be reduced fairness from reduced ability to fully participate. | * Hearing team to list with longer time estimate, so participants or adviser/supporter can request a break when needed. * Conversely, where the registrant/witness and legal representative / McKenzie friend / supporter are in the same room, they will need to be asked to separate when the registrant/witness is giving evidence. * Hearings team to consider allocating dedicated video-link lines (subject to maximum capabilities). |
| Continued uncertainty over current health risks and travel options | If a matter is adjourned to a physical hearing, there could be a delay of up to one year before the matter is heard, reducing public protection and effectiveness of witness testimony, and thus affecting fairness of the proceedings and confidence in the outcome. | * Hold discussion with parties to list all matter for remote hearing unless there are exceptional circumstances that outweigh the benefits from speedier justice. * Consider all flexible and reasonable adjustments that may mitigate the concern. |
| Proceedings being recorded covertly (risk exists in physical hearings but is potentially harder to monitor at remote hearings) | The unauthorised posting of GOC hearings, e.g. on social media, could infringe the privacy of registrants, witnesses, GOC staff and other participants. There may also be an impact on public confidence in our processes. | * Hearing officer to look out for any attempt to record using Microsoft Teams. * Any observers to request advance permission from the GOC, so we have a record of their identity in case there is a breach of confidentiality. * Hearing officer to warn observers against making any recording. * Observers need to confirm that they will abide by set of rules before they are able to observer the hearing. * Chair to remind attendees at regular stages of the hearing. |
| Unrepresented registrants | Not being able to understand the process or feeling like they are not in a position to object to a remote hearing. | * Hearing letters and notices encourage unrepresented registrants to seek advice. * Registrants are encouraged to speak to their Scheduling Officer if they do not understand the process. Hearings operate independently from the GOC’s case progression team. * Protocol written in plain English and links provided to documents that were referred to. * Correspondence to unrepresented registrants is being reviewed to ensure that it is easily understandable. * Feedback form has been introduced which is aimed at identifying the experience that unrepresented registrants have had at hearings so that any learning can be implemented. * Unrepresented registrants can request a case management meeting in which position will be explained. |
| Lack of flexibility by stipulating that all non-substantive events should take place remotely | The GOC having an inflexible approach with listing which could be detrimental to a registrant. | * All listing decisions will be considered on a case by case basis. If a registrant wishes for a non-substantive event to take place physically then this will be reviewed by the team. * Any concerns with the application of the policy can be sent to the Head of Hearings for resolution. |

# Step 3: Monitoring and review

**Q6. What monitoring mechanisms do you have in place to assess the actual impact of your policy?**

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| The statement will be reviewed and there will be a standing agenda item at Defence Stakeholder Group meetings.  All those who took part in the consultation have been asked to feedback to the Head of Hearings directly. |

Please provide a review date to complete an update on this assessment (three months from initial completion).

**Date:** by 30 September 2021