Impact Assessment Screening Tool

Name of policy or process	CPD reform
Purpose of policy or process	To reform GOC's CPD requirements
Team/Department	Education and CPD
Date	3 August 2026
Screen undertaken by	Steve Brooker
Approved by	L Milliner
Date approved	17 Sept 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:
1, 2 and 3: No funds are required during the policy development phase of the project, but implementation of short-term reforms (e.g. recalibration of points) may require IT costs in the 2027/28 financial year that exceed the development budget in the contract for the MyCPD platform. Long-term reforms like ending the points system would result in savings for GOC and reduced compliance costs for registrants. The £45 annual CPD provider fee is prescribed in the CPD Rules 2021 and is outweighed by the costs of regulation. The timetable for delivery of long-term reform is not within the GOC's control and will be determined by the UK Government. We recognise that our proposals may have adverse economic consequences for CPD providers. However, we should not assume that registrants will undertake less CPD because of the changes. We consider that a viable market for CPD provision that would enable registrants to fulfil the revised requirements will continue to exist if our proposals are implemented. 3 and 4: The CPD Rules 2021 are secondary legislation. Our working assumption is that government will not prioritise reform to the CPD Rules 2021 during the current parliament. Proposals labelled as short-term are possible within the CPD Rules 2021. 8: A communications plan supported consultation engagement. The consultation document and annexes were translated into Welsh. The proposals in this document relate to a framework of CPD regulation that will apply to all registrants across the UK, including in Wales. Consultation feedback confirmed our assessment that these proposals will not have any effects on opportunities to use the Welsh language or affect the treatment of the Welsh language. Full impact assessment not required.

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	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	
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	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	
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	No - 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:
1-13: We do not anticipate that respondents to the consultation will provide personal data about individuals, but they may provide information about 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). 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 existing governance controls around EDI monitoring data will be applied as part of our wider data assurance approach. 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	
	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	

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	
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	
	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	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: Decisions on the CPD system will be made by our Council following public consultation, which will affect individuals and business owners. There is no right of appeal for Council decisions, except judicial review. During implementation, participation and outcomes across protected groups will be monitored through the points system (short-term reforms) and audit system (long-term reforms), so any emerging disparities can be identified and addressed. 5: The consultation was available to all on our website. Documents are available in alternative formats on request, and our website meets accessibility guidelines. Any decisions on the CPD system covered in the consultation will be made at a public Council meeting which takes place online and is open to all to attend. We publish Council papers a week in advance of meetings. Operational matters relating to implementation may be taken by the executive working within schemes of delegation. 6-9: Council meetings take place online. As above, relevant decisions would be made at the public Council meeting, which is open to the public. Papers for the meeting are published a week in advance and are available in alternative formats on request. 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	Under the current model registrants must obtain the same points requirements regardless of age, which may be disproportionate for experienced professionals. The need to obtain CPD points regardless of intentions to retire may disadvantage older professionals. Therefore, it is possible that older professionals will benefit from a less prescriptive CPD system. Consultation feedback highlighted that greater flexibility should reasonably be expected to benefit registrants working outside of traditional high-street eye care delivery patterns. Examples given included practitioners who are older.
Disability	Positive	Registrants with a disability may find it harder to attend events such as conferences which attract high numbers of points meaning the total points requirement can be harder to reach. The need to accumulate sufficient points by a fixed deadline to remain on the register can cause anxiety towards the end of the cycle, especially for registrants who are neurodiverse. Therefore, registrants with a disability may benefit from a less prescriptive CPD system. Some consultation feedback confirmed these benefits. Conversely, some consultation feedback also highlighted that a less structured CPD system could cause difficulties for registrants who are neurodiverse. In response, our expectation is that most registrants will continue to access provider led CPD via employers and events with self-directed CPD growing in influence over time. The new system would present greater choice, allowing registrants to continue with a highly structured approach if that is what suits them best. Guidance by GOC and others can support registrants by suggesting norms, detailing good practice and providing practical resources like templates. A minimum requirement for GOC guidance will be to explain what GOC will look for when reviewing CPD records and the circumstances that could lead to removal from the register.
Sex	Neutral	We have no evidence that the current CPD system creates different impacts for men or women. However, we will monitor participation and outcomes through implementation to identify any emerging disparities.

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
Gender reassignment (trans and non-binary)	Neutral	No specific impacts identified at this stage. We do not hold evidence showing barriers linked to the CPD points model. We will ensure the consultation and supporting materials are inclusive and that any system changes (e.g., CPD system updates) support name changes and correct identity information.
Marriage and civil partnership	Neutral	We do not have evidence that registrants in this group are disproportionately affected by the current CPD requirements. No differential impact is expected under the proposed reforms.
Pregnancy/ maternity	Positive	Our research does not indicate that registrants in this category find the current system too onerous. Even so, it is reasonable to infer that a less prescriptive system would benefit registrants who find it difficult to meet the points requirements due to lack of time. An advantage of the current three-year cycle supported by our approach to exceptional circumstances is that it supports 'CPD breaks' due to pregnancy, caring responsibilities and other life events. This is because the total points needed can be spread over the course of each cycle. If our proposals are implemented, the concept of a three-year CPD cycle will end. Our guidance on CPD record review will explain how we will treat such situations.
Race	Neutral	We do not currently hold evidence showing differential impact by ethnicity. Access to CPD events can vary depending on employment setting, but this is not necessarily linked to race. We will continue to monitor participation data to identify any patterns.
Religion/belief	Neutral	No specific impacts identified. CPD cycles do not require attendance at events tied to particular dates, and a less event-driven system may reduce any risk of clashes with religious observance.
Sexual orientation	Neutral	We have no evidence that the current CPD model impacts registrants differently based on sexual orientation, and the proposed reforms are not expected to create any new barriers.

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
Other groups (e.g. carers, people from different socio-economic groups)	Positive	Our research indicates that subgroups more likely to think that the number of points required under the current system is too high, includes dispensing opticians, those working full-time, and those who work as locums. Those with caring responsibilities may find it harder to attend events such as conferences which attract high numbers of points meaning the total points requirement can be harder to reach. Participation and outcomes across protected groups will be monitored through the points system (short-term reforms) and audit system (long-term reforms), so any emerging disparities can be identified and addressed. Consultation feedback highlighted potential disadvantages if the system becomes less structured and more reliant on self-direction. At risk-groups cited included: locums, sole practitioners, portfolio workers, those on maternity leave or career breaks, part-time registrants, and those with disabilities or neurodiversity (such as autism, ADHD, dyslexia). However, others highlighted that greater flexibility should reasonably be expected to benefit registrants working outside of traditional high-street eye care delivery patterns. Examples include practitioners who are older, working part-time or those with caring responsibilities. Further, a greater emphasis on self-directed CPD should also support less affluent registrants, including those not eligible for NHS grants or not working for large employers where there is ready access to CPD activities charged at no cost to registrants. As highlighted in the section on disability above, the new system would present greater choice, allowing registrants to continue with a highly structured approach if that is what suits them best. GOC guidance will provide clarity about our minimum expectations, as well as materials like templates, thus supporting those who prefer greater structure. Consultation feedback highlighted concerns about impacts of specific proposals for business registrants to play a greater role in supporting CPD. However, we have stepped back from these proposals following stakeholder feedback.