

Impact Assessment Screening Tool

Name of policy or process:	Refraction by dispensing opticians for the purposes of the sight test (as set out in our 2013 statement on testing of sight)
Purpose of policy or process:	To set out the GOC's position on whether dispensing opticians should be able to carry out refraction for the purposes of the sight test
Team/Department:	Policy
Date:	13/3/23
Screen undertaken by:	Marie Bunby
Approved by:	Steve Brooker
Date approved:	14/3/23
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	N/A
	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:

4. Future legislation changes: The Opticians Act is due to be updated as part of the Department of Health and Social Care's legislative reform programme.

5. Reputation and media: This issue has prominent in the optical trade press during the last 12 months.

B) Information governance	High risk	Medium risk		Low risk	? or N/A
1. What data is involved?	Sensitive personal data	Personal data	Private / closed business data	Confidential / open business data	N/A
2. Will the data be anonymised?	No	Sometimes, in shared documents	Yes, immediately, and the original retained	Yes, immediately, and the original deleted	N/A
3. Will someone be identifiable from the data?	Yes	Yes, but their name is already in the public domain(SMT/Council)	Not from this data alone, but possibly when data is merged with other source	No – all anonymised and cannot be merged with other information	N/A
4. Is all of the data collected going to be used?	No, maybe in future	Yes, but this is the first time we collect and use it	Yes, but it hasn't previously been used in full before	Yes, already being used in full	N/A
5. What is the volume of data handled per year?	Large – over 4,000 records	Medium – between 1,000-3,999 records		Less than 1,000 records	N/A
6. Do you have consent from data subjects?	No	Possibly, it is explained on our website (About Us)	Yes, explicitly obtained, not always recorded	Yes, explicitly obtained and recorded/or part of statutory duty/contractual	N/A
7. Do you know how long the data will be held?	No – it is not yet on retention schedule	Yes – it is on retention schedule	Yes – but it is not on the retention schedule	On retention schedule and the relevant employees are aware	N/A
8. Where and in what format would the data be held? (delete as appropriate)	Paper; at home/off site; new IT system or provider; Survey Monkey; personal laptop	Paper; archive room; office storage (locked)	GOC shared drive; personal drive	other IT system (in use); online portal; CRM; Scanned in & held on H: drive team/dept folder	N/A
9. Is it on the information asset register?	No	Not yet, I've submitted to Information Asset Owner (IAO)	Yes, but it has not been reviewed by IAO	Yes, and has been reviewed by IAO and approved by Gov. dept.	N/A
10. Will data be shared or disclosed with third parties?	Yes, but no agreements are in place	Yes, agreement in place	Possibly under Freedom of Information Act	No, all internal use	N/A
11. Will data be handled by anyone outside the EU?	Yes	-	-	No	N/A
12. Will personal or identifiable data be published?	Yes – not yet approved by Compliance	Yes- been agreed with Compliance	No, personal and identifiable data will be redacted	None - no personal or identifiable data will be published	N/A

B) Information governance	High risk	Medium risk		Low risk	? or N/A
13. Individuals handling the data have been appropriately trained	Some people have never trained by GOC in IG	All trained in IG but over 12 months ago		Yes, all trained in IG in the last 12 months	N/A

Please put commentary below about reasons for information governance ratings:

This statement is not a process and does not involve the collection of data, therefore all of this section is marked as not applicable.

C) Human rights, equality and inclusion	High risk	Medium risk		Low risk	? or N/A
1. Main audience/policy user	Public			Registrants, employees or members	
2. Participation in a process (right to be treated fairly, right for freedom of expression)	Yes, the policy, process or activity restricts an individual's inclusion, interaction or participation in a process			No, the policy, process or activity does not restrict an individual's inclusion, interaction or participation in a process	
3. The policy, process or activity includes decision-making which gives outcomes for individuals (right to a fair trial, right to be treated fairly)	Yes, the decision is made by one person, who may or may not review all cases	Yes, the decision is made by one person, who reviews all cases	Yes, the decision is made by an panel which is randomly selected; which may or may not review all cases	Yes, the decision is made by a representative panel (specifically selected) OR No, no decisions are required	N/A
	There is limited decision criteria; decisions are made on personal view	There is some set decision criteria; decisions are made on 'case-by-case' consideration	There is clear decision criteria, but no form to record the decision	There is clear decision criteria and a form to record the decision	N/A
	There is no internal review or independent appeal process	There is a way to appeal independently, but there is no internal review process	There is an internal review process, but there is no way to appeal independently	There is a clear process to appeal or submit a grievance to have the outcome internally reviewed and independently reviewed	N/A
	The decision-makers have not received EDI and unconscious bias training, and there are no plans for this in the next 3 months	The decision-makers are due to receive EDI and unconscious bias training in the next 3 months, which is booked	The decision-makers are not involved before receiving EDI and unconscious bias training	The decision-makers have received EDI and unconscious bias training within the last 12 months, which is recorded	N/A

C) Human rights, equality and inclusion	High risk	Medium risk		Low risk	? or N/A
4. Training for all involved	Less than 50% of those involved have received EDI training in the last 12 months; and there is no further training planned	Over 50% of those involved have received EDI training, and the training are booked in for all others involved in the next 3 months.		Over 80% of those involved have received EDI training in the last 12 months, which is recorded	N/A
5. Alternative forms – electronic / written available?	No alternative formats available – just one option	Yes, primarily internet/computer-based but paper versions can be used		Alternative formats available and users can discuss and complete with the team	N/A
6. Venue where activity takes place	Building accessibility not considered	Building accessibility sometimes considered		Building accessibility always considered	N/A
	Non-accessible building;	Partially accessible buildings;	Accessible buildings, although not all sites have been surveyed	All accessible buildings and sites have been surveyed	N/A
7. Attendance	Short notice of dates/places to attend	Medium notice (5-14 days) of dates/places to attend		Planned well in advance	N/A
	Change in arrangements is very often	Change in arrangements is quite often		Change in arrangements is rare	N/A
	Only can attend in person	Mostly required to attend in person		Able to attend remotely	N/A
	Unequal attendance / involvement of attendees	Unequal attendance/ involvement of attendees, but this is monitored and managed		Attendance/involvement is equal, and monitored per attendee	N/A
	No religious holidays considered; only Christian holidays considered	Main UK religious holidays considered	Main UK religious holidays considered, and advice sought from affected individuals if there are no alternative dates	Religious holidays considered, and ability to be flexible (on dates, or flexible expectations if no alternative dates)	N/A
8. Associated costs	Potential expenses are not included in our expenses policy	Certain people, evidencing their need, can claim for potential expenses, case by case decisions		Most users can claim for potential expenses, and this is included in our	N/A

C) Human rights, equality and inclusion	High risk	Medium risk		Low risk	? or N/A
				expenses policy; freepost available	
9. Fair for individual's needs	Contact not listed to discuss reasonable adjustments, employees not aware of reasonable adjustment advisors	Most employees know who to contact with queries about reasonable adjustments		Contact listed for reasonable adjustment discussion	N/A
10. Consultation and Inclusion	No consultation; consultation with internal employees only	Consultation with employees and members	Consultation with employees, members, and wider groups	Consultation with policy users, employees, members and wider groups	

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

Most of this section is marked as not applicable because decision-making for an individual is not required and no training would be necessary to follow the current position set out in our current statement.

2. Participation in a process: Our 2013 statement on testing of sight restricts dispensing opticians from being able to refract for the purposes of the sight test.

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
Age	Neutral	We do not think that our policy to continue restricting dispensing opticians from being able to refract for the purposes of the sight test would have any impact related to age.
Disability	Neutral	We do not think that our policy to continue restricting dispensing opticians from being able to refract for the purposes of the sight test would have any impact related to disability.

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
Sex	Neutral	We do not think that our policy to continue restricting dispensing opticians from being able to refract for the purposes of the sight test would have any impact related to sex.
Gender reassignment (trans and non-binary)	Neutral	We do not think that our policy to continue restricting dispensing opticians from being able to refract for the purposes of the sight test would have any impact related to gender reassignment.
Marriage and civil partnership	Neutral	We do not think that our policy to continue restricting dispensing opticians from being able to refract for the purposes of the sight test would have any impact related to marriage and civil partnership.
Pregnancy/maternity	Neutral	We do not think that our policy to continue restricting dispensing opticians from being able to refract for the purposes of the sight test would have any impact related to pregnancy/maternity.
Race	Neutral	We do not think that our policy to continue restricting dispensing opticians from being able to refract for the purposes of the sight test would have any impact related to race.
Religion/belief	Neutral	We do not think that our policy to continue restricting dispensing opticians from being able to refract for the purposes of the sight test would have any impact related to religion/belief.
Sexual orientation	Neutral	We do not think that our policy to continue restricting dispensing opticians from being able to refract for the purposes of the sight test would have any impact related to sexual orientation.
Other groups (e.g. carers, people from	Neutral	We do not think that our policy to continue restricting dispensing opticians from being able to refract for the purposes of the sight test would have any impact related to other groups.

Protected characteristic	Type of potential impact: positive, neutral, negative?	Explanations (including examples or evidence/data used) and actions to address negative impact
different socio-economic groups)		

Full Impact Assessment (to be completed if required)

Step 1: Scoping the impact assessment (IA)

Name of the policy/function	Refraction by dispensing opticians for the purposes of the sight test (as set out in our 2013 statement on testing of sight)
Assessor	Marie Bunby
Date IA started	13/3/23
Date IA completed	14/3/23
Date of next IA review	March 2024
Purpose of IA	To aid Council in its decision-making in respect of refraction by dispensing opticians for the purposes of the sight test
Approver	Steve Brooker
Date approved	14/3/23

Q1. Screening assessment

- Has a screening assessment been used to identify the potential relevant risks and impacts? Tick all that have been completed:
 - ✓ Impacts
 - ✓ Information governance (privacy)
 - ✓ Human rights, equality and inclusion
 - 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?

Aims
To review whether refraction by dispensing opticians can be undertaken for the purposes of the sight test (currently restricted as set out in our 2013 statement on testing of sight).
Purpose and outcome
The purpose of the current statement on testing of sight is to set out the GOC's interpretation of what can be delegated under the Opticians Act in respect of the testing of sight. The outcome of the statement means that no part of the sight test (including refraction for the purposes of issuing a prescription) may be delegated. The purpose of the call for evidence was to review whether this should continue to remain the case.

Who will benefit

Patients and the public will benefit by being protected as their care will be provided by professionals who are appropriately trained and experienced in carrying out refraction for the purposes of the sight test. A single healthcare professional will be responsible for exercising clinical judgement on detection of eye health issues.

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.

Activity/aspect

Refraction by dispensing opticians for the purposes of the sight test

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.

Available evidence – used to scope and identify impact

As part of our [call for evidence on the Opticians Act 1989 and consultation on associated GOC policies](#) we asked whether dispensing opticians should be able to refract for the purposes of the sight test and what the advantages, disadvantages and impacts would be of amending or removing our 2013 statement on testing of sight.

We commissioned further research into refraction by dispensing opticians:

- Public views on refraction - this report was produced by WA Research. It involves deliberative research to understand the views of patients and the general public on whether dispensing opticians should be permitted to carry out refraction for the purposes of the sight test, and, if so, under what circumstances and regulatory controls.
- Clinical research on refraction in the sight test - this report was produced by Prof Bruce Evans, Dr Rakhee Shah, Dr Miriam Conway and Ms Liz Chapman. The report summarises clinical research on: how the sight test is delivered by commercial providers of optical services across the four nations of the UK; the possible impacts where the refraction, binocular vision and eye health checks are not carried out by the same person or not at the same time or in the same place, both with and without the oversight/supervision of an optometrist or registered medical practitioner; and the role of orthoptists in refraction and sight testing.

We also produced in-house research on international comparisons on refraction services with the sight test model in the UK which summarises our literature review.

These three pieces of research are available on our website:

<https://optical.org/en/publications/policy-and-research/research-associated-with-the-call-for-evidence-on-the-opticians-act>

Our statement on testing of sight has been in place since 2013 and we have not received any evidence during this time that patients or the public are not being protected, or that there have been any developments in case law that would affect the statement.

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:

N/A

Q6. Involvement and consultation

Consultation has taken place, who with, when and how

Our public call for evidence and consultation was open between 28 March and 18 July 2022. This was available on our Citizen Space [consultation hub](#). We contacted individual and business registrants, professional/representative bodies, Government departments and patient representative bodies/charities to make them aware of the consultation and to encourage responses.

Summary of the feedback from consultation

We received 353 responses from a wide range of stakeholders. Section 4 of our proposed GOC response to the call for evidence (annex 1 of the Council paper on legislative reform) analyses and summarises the feedback we received during the call for evidence.

We have set out our analysis of the arguments for and against refraction by dispensing opticians in annex 2 of the Council paper.

The 'GOC response – refraction by dispensing opticians' section of annex 1 summarises our proposed outcome as follows: "Our overriding consideration is patient safety. Based on the information collected during the call for evidence and findings from the subsequent research, at this point in time we are not satisfied that dispensing opticians should be permitted to refract for the purposes of the sight test. Our main concern is undetected pathologies, including subtle clues about eye health during refraction and ophthalmoscopy that may be missed if different professionals conduct these sight test components. This risk would remain even if dispensing opticians were to receive further training/accreditation

and be under the supervision/oversight of an optometrist or registered medical practitioner.”

While we have indicated that we may update our 2013 statement on testing of sight, at this point in time the restrictions on dispensing opticians refracting for the purposes of the sight test would remain (unless Council was to approve a different course of action).

Link to any written record of the consultation to be published alongside this assessment

Our GOC response to the call for evidence and consultation will be published on our consultation platform when it has been approved. A draft response is published as part of our March 2022 Council papers: [Council meeting papers | GeneralOpticalCouncil](#)

How engagement with stakeholders will continue

We will continue to engage with our stakeholders as we progress the work resulting from the call for evidence and the wider programme of legislative reform. This will be through informal meetings and further consultation on specific topics.

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
Refraction by dispensing opticians for the purposes of the sight test	Risk that if we inappropriately allow dispensing opticians to refract for the purposes of the sight test, patient safety may be put at risk resulting in missed pathologies ultimately leading to sight loss and further pressure on hospital eye services.	<ul style="list-style-type: none"> • Our 2013 statement on testing of sight to continue to restrict dispensing opticians from being able to carry out refraction for the purposes of the sight test (because as outlined in Q6 we are not satisfied that dispensing opticians should be permitted to refract for the purposes of the sight test). • We will consider updating our statement to clarify the position in relation to pre-screening and triage checks (see Q7 below) – timeframe not yet known.
Refraction by dispensing opticians for the purposes of the sight test	Risk that dispensing opticians might feel that their skillset is not being fully utilised.	We think that the patient safety risks outweigh the risks of allowing dispensing opticians to refract for the purposes of the sight test. We would encourage dispensing opticians to continue to develop their skills mix and meet their full professional capabilities. The development of contacts lens opticians is a recent example of where this has been achieved. There may be other areas, such as low vision services, which would be a natural extension of dispensing opticians' current scope of practice.

Step 3: Monitoring and review

Q7. What monitoring mechanisms do you have in place to assess the actual impact of your policy?

In our proposed GOC response to the call for evidence we have said: “We will consider updating our 2013 statement on testing of sight to clarify the position in relation to pre-screening tests and triage checks related to the sight test that may be carried out by persons other than the optometrist or registered medical practitioner. Over time, advances in technology have meant various steps in the patient journey have become automated and safely delegated as part of pre-screening and triage. Use of autorefractors is one example of this and we understand further developments, including in relation to refraction, are on the horizon. If we decide to update our 2013 statement, we will carry out further consultation on this aspect of the testing of sight.”

Please provide a review date to complete an update on this assessment.

Date: March 2024