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Equality Impact Assessment (EIA)

Description of Activity or Project Name	Business Lead & Directorate	
Policy review of English language requirements and update to published English language guidance	Policy and Research	
Author	**Date**	**Version**
Laura Williamson	07 October 2026	1.2
Summary of the aims and objectives	It is an important part of our public protection role that we assure ourselves that everyone joining our register can communicate effectively in English. In doing so, we are upholding our legal duty to ensure registrants are competent in English. Our English language requirements must be a fair and proportionate way to ensure that everyone who is capable of safe and effective practice as a Dentist or DCP is able to join our register, no matter where they trained or how they became competent in English. This work contributes to the GDC's strategic aims: • Exploring and evaluating options for assessing internationally qualified applicants, to create an efficient and effective, forward looking international registration framework to meet future capacity demands. • Modernising our registration and renewal processes, enabling digital and online interfaces where possible. Project aims: Aim 1: Conduct a comprehensive policy review of the GDC's English language proficiency requirements and deliver policy recommendations for changes to improve the process for both internal teams and registrants. Aim 2: Renew and update the online guidance to reflect these policy changes, making the guidance clear and user friendly for all internal and external audiences.	
What consultation or evidence gathering has taken place to inform this EIA?	This work has included direct engagement with relevant stakeholders, including the British Dental Association, a variety of health and dental regulators in the UK and overseas, English Language test providers, and relevant charities e.g. RefuAid. We have conducted desk-based research and looked at the recent English language changes undertaken by other regulators, namely the NMC, GMC, and AHPRA, to assess any equality impact we can learn from. We will be conducting a public consultation on the new guidance to ensure we engage with a wider range of stakeholders including dental professionals and the public too.	
Who is impacted by the change?	Internationally qualified dental professionals.	

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What are the arrangements for monitoring the impact of the change?	We will seek feedback on equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response. Ongoing monitoring of English Language related ftp cases and feedback/complaints will help to identify impact post-implementation.

Distribution List				
Name	Title	Department	Date	Version

Version History		
Revision Date	Version	Summary of Changes
25 June 2026	1.1	Edits as per ILAS feedback
07 October 2026	1.2	Edits as per ELT feedback Updates on actions taken

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Screening Questions – Assess the impact on different groups of people

In the table below, please indicate how the change affects particular groups of people in different ways. Specifically consider how the change will impact those who have Protected Characteristics. Different aspects of the project may have different impacts – these should be separated in the table.

Screening questions should be completed for all policies, projects, strategies etc. You may wish to refer to the guidance section, 'What should we think about when completing EIAs?' when considering the impact.

Mitigation actions only need to be completed where a negative impact or disadvantage has been identified.

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Explanation of potential/actual impact – Screening Questions			What actions to mitigate adverse impact can/have been taken?		
Protected Characteristic	**Potential impact: Positive Negative Neutral**	**Please explain and give examples/evidence**	**Actions planned to address the disadvantage or negative impact**	**Individual responsible**	**Updates on actions, with dates**
Age	Negative	There is well established evidence that age-associated cognitive decline can impact test proficiency, particularly where tests require speed of processing, working memory, and executive cognitive function as opposed to cumulative knowledge and experiential skills (ref). We also recognise that older applicants may find language tests more challenging due to educational or technological barriers (ref). This means that policy changes that encourage the testing route for more applicants may have a negative impact relating to age as a protected characteristic. It is important to note that less than 5% of our register is over-65 (ref), and so the number of international applicants that may be negatively impacted by this will be low.	Maintaining non-testing-based routes to evidence. Different test providers will meet a wider variety of needs.	Policy	After conducting the test assessment, we are proposing a variety of test providers to help meet a wider variety of needs.
Disability	Positive	Increasing the testing providers that a language test can be accessed through, and accepting online versions of tests, will have a positive impact on accessibility. • Applicants can complete a test in a location most accessible to them • Applicants may sit the test at their preferred location, including at home, which reduces any geographical, travel or accessibility barriers	We must ensure accepted tests offer reasonable adjustments.	Policy/Test providers	We have done this as part of the test assessment exercise and ensured all tests we are proposing to accept do offer reasonable adjustments, in

		Many test providers have a number of ways to support people who are disabled either temporarily (for example, a broken arm) or long-term (for example, ADHD), or those with specific additional needs at the time of the exam (for example, feeding an infant).			varying forms across providers.
	Positive	Improvements to our digital experience i.e. improving the usability of the reference forms, may help reduce accessibility barriers faced by some people with disabilities. It is worth considering some disabilities make using a computer difficult though the English language policy changes won't introduce any more negative impact than that of MyGDC and our other digital systems overall so should not be considered here.			
	Positive	Rewriting our English language guidance to be more digestible and easier to read will have a positive impact on those with any disability that impacts reading (e.g. Dyslexia) or information processing (e.g. ADHD). We will also consider providing the guidance in additional accessible formats e.g. subtitled video, ensuring written guidance is compatible with screen reader software.			
Gender Reassignment	Neutral	The new policy and guidance is not expected to have any differential impact relating to Gender Reassignment as a protected characteristic.			
Marriage and Civil Partnership	Neutral	The new policy and guidance is not expected to have any differential impact relating to Marriage and Civil Partnership as a protected characteristic.			

Pregnancy and Maternity	Positive	Increasing the testing providers that a language test can be accessed through, and accepting online versions of tests, will have a positive impact on accessibility which is important for those who are pregnant or looking after infants. • Applicants can complete a test in a location most accessible to them • Applicants may sit the test at their preferred location, including at home, which reduces any geographical, travel or accessibility barriers faced as a result of Pregnancy or Maternity Many test providers have ways to support people who are feeding an infant.	We must ensure accepted tests offer reasonable adjustments.	Policy/Test providers	We have done this as part of the test assessment exercise and ensured all tests we are proposing to accept do offer reasonable adjustments, in varying forms across providers.
	Negative	Pregnancy is increasingly recognised for its potential impact on cognitive function (ref), and some evidence found that pregnancy can significantly decrease performance in verbal fluency (ref). Therefore, pregnancy may impact an applicant's ability to take a language test and perform as they would usually. This means policy changes that encourage the testing route for more applicants may have a negative impact relating to Pregnancy as a protected characteristic. We may also recognise that progress through the application process may not be suitable during the maternity period due to time, energy, or financial constraints.	Maintaining the 2 year time limit on test validity means tests taken pre-pregnancy will remain valid until post-natal period. Maintaining non-testing-based routes to evidence also allows other options if testing is not suitable for this group. A transition period of implementation will avoid creating any sudden barriers on those who have begun or planned	Policy	Our drafted guidance maintains the 2 year time limit on evidence.

			their application based on current requirements.		
Race	Negative	As the proposed changes will only affect international applicants, they are more likely to affect applicants who do not identify as white. Policy changes that remove routes to evidence, or implement stricter evidence requirements, can create barriers to registration, therefore employment for these groups. This is due to accessibility of English language courses, differences in learning and cultural contexts across applicants, and the financial impact of paying for a test or achieve the experience required to use as evidence. We can also consider the specific effect on race of shifting from courses taught and examined in English, to accepting on those qualifications or experience gained only in a country on the UK government list of English-speaking countries. The difference between countries (and courses) where there is English language tuition, and countries on the approved list we are adopting skews quite heavily by race. However, we consider our proposals to be proportionate, reflective of the racial makeup of applicants to the register, and in line with our obligations to ensure that professionals on our register are capable of safe and effective practise in the UK.	Policy changes to make the testing route more accessible will help to mitigate against these barriers, particularly accepting a wider variety of English language tests. Ensure testing providers are globally available. We can provide guidance on where applicants can seek training and financial support. Maintain 'other' evidence so that we are not disproportionality restrictive if applicants have a legitimate, robust alternative form of English language evidence. A transition period of implementation will avoid creating any sudden barriers for those who have begun or planned their application based on current requirements. Impact monitoring post-implementation to identify any unintended	Policy	After conducting the test assessment, we are proposing a variety of test providers that are available across the world. Our drafted guidance includes signposting to organisations that can support with financing an English language exam. Our drafted guidance maintains 'other' evidence.

			disproportionate effects and review the policy if adverse impacts emerge.		
	Positive	Through stakeholder engagement we have found that at least one test provider (DET) provides free tests for certain groups, e.g. refugees. RefuAid support the policy change to our accepted tests as many of their clients face challenges to access IELTS and would benefit from a more accessible testing route.			
Religion or Belief	Neutral	The new policy and guidance is not expected to have any differential impact relating to Religion or Belief as a protected characteristic.			
Sex	Neutral	The new policy and guidance is not expected to have any differential impact relating to Sex as a protected characteristic.			
Sexual Orientation	Neutral	The new policy and guidance is not expected to have any differential impact relating to Sexual Orientation as a protected characteristic.			

Promoting equality

Under the Equality Act 2010, we have a legal duty to have 'due regard' to the need to promote equality of opportunity, eliminate unlawful discrimination and foster good relations between people who have a protected characteristic and those who do not.

We are determined to do more than just meet our statutory obligations. We are committed to actively promoting equality where we can because we acknowledge the value that diversity of thought and experience brings amongst the staff who work within the organisation, and the stakeholders we work with. By looking for ways to promote inclusion and help people feel heard and valued, we meet our strategic EDI objectives and deliver our vision of being a champion of EDI inside our organisation, with the sector we regulate and with the public.

If you have not identified any positive impacts, please detail how this project will aim to promote equality, eliminate discrimination or foster good relations.	n/a
If there is no evidence that the change will achieve these aims, what changes, if any, could be made to achieve them?	n/a

Evaluation

Please select the most relevant outcome (grey column) based on your responses to the screening questions and, if relevant, the full EIA.

The second column will help guide your next steps.

The evidence indicates that there are disadvantages or negative impacts AND has identified positive impacts.	Most of the proposed changes will have a neutral or positive impact on those who have Protected Characteristics. We recognise that some of our proposals may have a negative impact on specific population groups but believe that these are justified in ensuring that we continue to meet our statutory obligations to protect the public. In developing our proposals, we have focused on objective ways that applicants can evidence their English language proficiency, providing fairness and clarity to international applicants. Any negative impacts identified can and will be mitigated appropriately. **We recommend that the proposed activity is taken forward.**

Additional Information

Where we do not have sufficient information to safely conclude whether there is a disadvantage or negative impact, it is necessary to think about what additional data or intelligence you will need to gather. Collection and analysis of this information may require input from EDI, OD or Research colleagues.

What additional evidence are you going to gather? *(Please put an "X" next to any that apply)*	Advice from experts	
	Demographic profiles	
	Existing consultation results	
	Existing user data	
	External verification e.g. expert views of people/organisations representing equality group(s)	X
	National best practice information e.g. PSA, CQC reports	
	New consultation with a specific equality group(s)	X
	Research reports	
	Relevant staff group expertise	
Other (please state)		
If you have any additional comments please add them here.	Consultation and ongoing monitoring with further inform any EDI considerations as this work is progressed and implemented.	

Approvals

Completed by	
Name and job title:	Laura Williamson, Policy Manager
Date of completion:	13 May 2026
Reviewed by Equality, Diversity & Inclusion	
Name and Job Title:	
Date of completion:	
Completed by Head of Department/Associate Director	
Name and Job Title:	Luke Blakeley, Head of Registration Policy
Date of completion:	
Will this EIA be published? Yes/No	
Any other comments?	No
Review date?	

Note: when completed, a copy of this form should be saved with the relevant strategy, plan, policy, project, contract, major change in service or decision and an electronic copy sent to the EDI team, who will arrange for publication on the GDC's web pages and the Intranet (as appropriate).