

Introduction

The GOC is committed to promoting and developing equality and diversity in all our work. We want to be sure that our policies, procedures and ways of working are fair to all individuals and groups, regardless of their ethnic origin, race, gender, religion or religious belief, disability, sexual orientation or age.

About the GOC

The GOC is the regulator for the optical professions in the UK. Our purpose is to protect, promote and maintain the health and safety of the public by promoting high standards of education and conduct amongst opticians. The Council currently registers around 22,000 optometrists, dispensing opticians, student opticians and optical businesses.

We have four core functions:

- Setting standards for optical education and training, performance and conduct.
- Approving qualifications leading to registration.
- Maintaining a register of individuals who are qualified and fit to practise, train or carry on business as optometrists and dispensing opticians.
- Investigating and acting where a registrant's fitness to practise, train, or carry on business is impaired.

The Council's work is built on a foundation of six core values. These values are based on the Better Regulation Commission's criteria for good regulation:

Proportionate

- We will identify and target the issues of greatest risk to public safety.
- We will remove unnecessary bureaucracy.

Accountable

- We will seek, and respond to, the views of stakeholders and partners.
- We will consider and review the consequences of our actions.

Consistent

- We will work in collaboration with UK health regulatory bodies and other partners to develop consistent policies and procedures.

Transparent

- We will explain and publicise decisions, and make public, wherever possible, Council information, activities and proceedings.

Targeted

- We will ensure that our activity is focused on the areas of greatest risk, or where there is most benefit to public health and safety.

Organisational Excellence

- We will provide good value for money.
- We will pursue high standards of customer service.
- We will ensure that the Council is a good place to work, particularly through developing and training our staff and members.
- We will promote and develop equality and diversity in all our work.

Purpose and scope

This Equality and Diversity Scheme fulfils our obligations under relevant equality legislation. The most recent legislation, which builds on statutes such as the Sex Discrimination Act 1975 and the Race Relations Act 1976, is:

- Equality Act 2006
- Disability Discrimination Act 2005 (DDA)
- Employment Equality (Age) Regulations 2006
- Employment Equality (Religion or Belief) Regulations 2003
- Employment Equality (Sex Discrimination) Regulations 2005
- Employment Equality (Sexual Orientation) Regulations 2003
- Race Relations Act 1976 (as amended) (RRA)
- Equal Pay act 1970 (as amended)

The GOC is subject to specific duties under the Equality Act 2006, and should have published a gender equality scheme by 30 April 2007. Under the DDA 2005, the Council must publish a disability equality scheme by 3 December 2007. The Department of Health has also signalled its intention to list the GOC for specific duties under the RRA, which would require the Council to publish a race equality scheme.

Where specific duties are imposed by legislation, these are an identifiable part of our Equality and Diversity Scheme. See Annex 2 for more detail on legislation.

Strategic objectives

The GOC considers that all of our public functions are relevant to our Race, Disability and Gender equality duties, as well as to our commitments in relation to equality in respect of age, religion and religious belief and sexual orientation. In particular, we believe that the GOC has a critical role to play in ensuring that the following are free from discrimination:

- access to optometry and dispensing optics training in the UK
- registration as an optometrist or dispensing optician in the UK
- access to our registers, public meetings and information
- our complaints and Fitness to Practise processes
- employment with or appointment to the GOC, its Council and committees.

Priorities

The priorities for the first scheme will be to establish appropriate governance structures to oversee the Council's equality and diversity work, and to ensure

effective reporting. We will also prioritise data collection in respect of the gender, race and disability status of all registrants to enable identification of any potential barriers or discrimination within our core functions which may require further action.

Responsibilities

Overall accountability for the dissemination and implementation of the Equality and Diversity Scheme lies with the Council of the GOC. Committees of the Council are responsible for ensuring that equality and diversity issues are taken into account in their work.

The Chief Executive, Directors and senior managers are responsible for implementing agreed equality and diversity policies. They are responsible for the development and delivery of the Action plan.

All staff, Council members, advisers, visitors, and hearings panel members are expected to promote fairness and equality and value diversity.

Action planning

Directors and senior managers were asked to assess the equality and diversity implications of their section's work, and to identify priorities and objectives for action. In future, the Equality and Diversity Action plan will be integrated with the annual business planning round.

Monitoring, audit and impact assessment

Effective mechanisms and tools for active monitoring and audit of the Equality and Diversity Scheme and Action plan will be developed and an annual assessment will be made of the impact of the Action plan on the work of the GOC. A report will be made to Council and included in the GOC Annual Report.

Progress to date

The GOC has already undertaken some work in relation to equality and diversity.

- We undertook a monitoring exercise in relation to the race and disability status of registrants in 2004.
- We already publish statistical data on the gender and age of registrants.
- We have taken steps to improve the accessibility of our registers.
- We have redesigned our website to be more accessible for people with disabilities.
- We have made core publications available in alternative formats.

Involvement and consultation

We shared an early draft of the Scheme and Action plan with individuals and organisations from amongst our stakeholders, including those which seemed to represent the views of disabled people.

[We will describe consultation activities and outcomes, including changes made as a result of feedback]

Annex 1 – Action plan 2007-9

R = Race equality duties, D = Disability equality duties, G = Gender equality duties

R	D	G	Objective	Actions needed	By when	Lead responsibility	Desired outcome
			Governance				
•	•	•	Governance structures	Establish appropriate governance structures for overview of equality and diversity issues	April 2008	Chief Executive	Effective mechanisms and tools for active monitoring and audit of the Equality and Diversity Scheme and Action plan
•	•	•	Assessment and reporting	Annual report to Council on the impact of the Action plan on the work of the GOC	from June 2008	Chief Executive	Council and the GOC's wider audiences have a clear picture of our progress in implementing the Action plan
•	•	•	Equality impact assessment	Develop and pilot an equality impact assessment process	April 2008	Director of Standards	Assessments will draw attention to any potential inequality before policies are put into operation, and identify opportunities to promote diversity

R	D	G	Objective	Actions needed	By when	Lead responsibility	Desired outcome
•	•	•	Equality evidence base	Develop/commission core information required to inform policy and decision-making (eg population ethnicity data, risk factors for eye disease)	April 2009	Director of Standards	Core data is available for impact assessment and other purposes
			Standards				
•	•	•	Guidance to registrants on promoting equality and diversity	Review codes of conduct to consider inclusion of equality and diversity duties and responsibilities	September 2008	Director of Standards	Optometrists and dispensing opticians are aware of their responsibilities to treat all patients fairly and with respect
				Review competencies to consider inclusion of skills and knowledge relating to equality and diversity	March 2009	Director of Standards	
				Review guidance of professional and representative bodies to ensure that they reflect equality and diversity	November 2009	Director of Standards	

R	D	G	Objective	Actions needed	By when	Lead responsibility	Desired outcome
			Education				
•	•	•	Access to GOC-approved training and assessments	Include a statement of our equality and diversity commitments in accreditation handbooks, and a requirement for education and training establishments to demonstrate an appropriate equalities and diversity framework	April 2008	Director of Education	Access to GOC-approved courses is free from discrimination; GOC-approved education and training establishments actively promote equality and diversity
•	•	•	Monitoring equalities data from GOC training and assessments	Collect, analyse and publish data from all GOC-approved training and assessments to determine trends in admissions, drop-outs, pass rates etc	June 2009	Director of Education	Data available to highlight any issues in relation to equality and diversity in optometry and dispensing optics education and training
•	•	•	Equality and diversity training for Visitors	Review training requirements in light of equality and diversity issues; arrange necessary training	Aug 2008; ongoing	Assistant Director of Education	Visitors are able to determine any equality and diversity issues when approving courses and examinations

R	D	G	Objective	Actions needed	By when	Lead responsibility	Desired outcome
			Registration				
		•	Monitor gender, age of registrants	Analyse and publish data showing the age and gender of registrants	Ongoing	Registration Manager	Data available to assess trends/ issues in relation to age and gender balance of registers
•	•		Monitor ethnicity and disability of registrants	Develop a monitoring form and systems for data collection and analysis	Dec 2007	Head of Communications, Registration/IT Manager	Effective, manageable system, consistent with other regulators to allow comparison across healthcare regulatory sector; high response rate; data available to analyse trends/ issues
		Consultation on new monitoring form/systems		Jan – Mar 2008			
		Send form to existing registrants and new applicants (including overseas); promote and publicise benefits		Apr 2008 and ongoing			
		Collect, analyse and publish data		Aug 2009			
	•		Accessibility of the registers	Continue to improve accessibility of the registers through improvements to the website search	Ongoing	Registration Manager	Greater access to information on our registers for people with disabilities

R	D	G	Objective	Actions needed	By when	Lead responsibility	Desired outcome
				options and telephone enquiry service			
			Fitness to Practise				
		•	Monitor gender, age of registrants involved in FTP processes	Record gender and age of registrants for statistical analysis; analyse and publish data	Dec 2007; Aug 2008	Director of Legal and FTP	Data available to analyse trends which may require further investigation/action
•	•		Monitor ethnicity, disability status of registrants involved in FTP processes	Record ethnicity, disability status and other diversity information relating to registrants for statistical analysis; analyse and publish data	Apr 2008; Aug 2009	Director of Legal and FTP	Data available to analyse trends which may require further investigation/action
	•		Review complaints procedures	Review complaints procedures to identify any actions needed to improve accessibility	Jan 2008	Director of Legal and FTP	Complaints information is easy to understand and available in suitable formats for service users with disabilities
•	•	•	Equality and diversity training for Investigation Committee	Review training requirements in light of equality and diversity issues;	Aug 2008; ongoing	Director of Legal and FTP	Investigation Committee members receive appropriate training

R	D	G	Objective	Actions needed	By when	Lead responsibility	Desired outcome
				arrange necessary training			to enable fair assessment of cases
			Hearings				
•	•	•	Encourage diverse pool of applicants to Hearings Panel appointments	Consider recruitment plan to encourage diverse applicants to apply for positions	July 2008 for terms from Jul 2010	Hearings Manager	Hearings panel members reflect diversity of registers and service users
•	•	•	Equality and diversity training for panel members	Review training requirements in light of equality and diversity issues; arrange necessary training	Jan 2008; ongoing	Hearings Manager	Hearings panel members receive appropriate training to enable fair hearings and remove any possible barriers or discrimination
			Human Resources				
•	•	•	Update HR policies and procedures	Review all HR policies and procedures to ensure they reflect the statutory duties and commitments in respect of equality and diversity	Jan 2008	Head of Human Resources	GOC human resource policies, procedures and practice reflect changes in legislation and support our approach to diversity (eg encouraging

R	D	G	Objective	Actions needed	By when	Lead responsibility	Desired outcome
							diverse applicants, family-friendly policies etc)
•	•	•	Equality and diversity training for staff and members	Review training needs and develop an equality and diversity training plan	Staff from Sept 07; members from Aug 08	Head of Human Resources	Staff and members understand equality and diversity issues in relation to their roles and have the skills and knowledge to deliver a service free from discrimination on any grounds
•	•	•	Monitor recruitment and selection and employment/ promotion of staff, members, hearings panel and visitors	Introduce monitoring as part of GOC recruitment/ appointment procedures and annual monitoring of staff, members etc	Jan 2008	Head of Human Resources	Data is available to assess any issues in relation to equality and diversity and determine priorities for action
				Report monitoring data as part of the annual equalities and diversity report to Council	June 2008	Head of Human Resources	
•	•	•	Monitor gender, ethnicity, disability	Use monitoring data to review diversity of	June 2008	Head of Human Resources	Council is aware of any diversity issues

R	D	G	Objective	Actions needed	By when	Lead responsibility	Desired outcome
			and age balance on GOC Council and committees	GOC Council and committees and report as part of the annual equalities and diversity report to Council			in relation to its make-up or the make-up of its committees
			Communications				
•	•		Involve diverse stakeholder groups in GOC work	Create links with BME and disability groups as part of stakeholder engagement strategy	Jan 2008 and ongoing	Head of Communications	Diverse stakeholder groups are engaged in the Council's work and able to provide their views
•	•	•	Promote equality and diversity activities	Identify opportunities to feature articles relevant to equality and diversity in the <i>GOC Bulletin</i> and Annual Report	Ongoing	Head of Communications	Stakeholders, particularly registrants, are aware of the GOC's work and objectives in relation to equality and diversity
	•		Website accessibility	Ensure website is W3C AA compliant as a minimum and AAA compliant where possible	Nov 2007	Head of Communications	GOC website is accessible for people with disabilities, particularly visual impairments
	•		Accessible publications	Review GOC publications and	September 2008	Head of Communications	Publications are available in

R	D	G	Objective	Actions needed	By when	Lead responsibility	Desired outcome
				consider the need for alternative formats			accessible formats
•	•		Positive representation of black and minority ethnic groups and people with disabilities	Monitor images in GOC publications for diversity	Ongoing	Head of Communications	Publications reflect the diversity of our registrants and service users
				Review and update GOC image library	June 2008	Head of Communications	
			Administration/ facilities				
	•		Accessibility of GOC premises for staff and visitors with disabilities	Continuous monitoring of work and public areas to ensure compatibility with requirements laid down in the DDA	Ongoing	Services Officer	No barriers to access for disabled employees or visitors
•	•	•	Equality and diversity considerations for GOC meetings	Create and use a check list for GOC meetings to ensure the needs of different groups have been taken into account; encourage feedback from users	Done; ongoing	Services Officer	No inadvertent discrimination or barriers to attending GOC meetings
			Procurement				
•	•	•	Compliance of	Standard terms and	June 2008	Director of	GOC procurement

R	D	G	Objective	Actions needed	By when	Lead responsibility	Desired outcome
			suppliers with equality legislation	conditions Monitor compliance of suppliers, contractors etc with equality legislation prior to awarding contracts and on a continuous basis following the award of any contract	Ongoing	Corporate Resources	supports best practice in equality and diversity
•	•	•	Diversity of suppliers	Review tender process	June 2009	Director of Corporate Resources	Tendering processes encourage diverse suppliers and ensure fair opportunities for all to win GOC contracts

Annex 2 – Legislation

Race equality

The Race Relations Act (RRA) general duty requires that we have due regard to the need to:

- eliminate unlawful racial discrimination;
- promote equality of opportunity between persons of different racial groups, and;
- promote good relations between persons of different racial groups

Should the GOC be listed for specific duties under the RRA, we would be required to prepare and publish a race equality scheme.

The Race Equality Scheme must state:

1. which functions and policies, or proposed policies, are relevant to its performance of the duty imposed by section 71(1) of the RRA;
2. the arrangements for:
 - a. assessing and consulting on the likely impact of proposed policies on the promotion of race equality;
 - b. monitoring policies for any adverse impact on the promotion of race equality;
 - c. publishing the results of such assessments and consultation;
 - d. ensuring public access to information and services which it provides; and
 - e. training staff in connection with the duties imposed by section 71(1) of the RRA.

Employment duty

The employment duty requires the Council to monitor, by racial group, the numbers of staff in post and applicants for employment, training and promotion.

The results of this monitoring must be published annually. The results should be used to:

- see if there are differences in the way racial groups are treated
- investigate the underlying reasons for the differences
- deal with any unfairness, disadvantage or possible discrimination.

Disability equality

The general duty of the Disability Discrimination Act (DDA) states that a public authority must, when carrying at their functions, have due regard to the need to do six things:

1. promote equality of opportunity between disabled people and other people
2. eliminate discrimination that is unlawful under the DDA
3. eliminate harassment of disabled people that is related to disability

4. promote positive attitudes towards disabled people
5. encourage participation by disabled people in public life.

The Council is also subject to the specific duty, which means we must:

- publish a Disability Equality Scheme (including within it an Action Plan) by 3 December 2007
- involve disabled people in producing the Scheme and Action Plan
- demonstrate we have taken actions in the Scheme and achieved appropriate outcomes
- report on progress
- review and revise the Scheme.

Gender equality

The Equality Act 2006 amends the Sex Discrimination Act (SDA) to place a statutory duty on all public authorities, when carrying out their functions, to have due regard to the need:

- to eliminate unlawful discrimination and harassment
- to promote equality of opportunity between men and women.

The specific duties are:

1. to prepare and publish a gender equality scheme, showing how we will meet our general and specific duties and setting out our gender equality objectives
2. in formulating our overall objectives, to consider the need to include objectives to address the causes of any gender pay gap
3. to gather and use information on how our policies and practices affect gender equality in the workforce and in the delivery of services
4. to consult stakeholders (i.e. employees, service users and others, including trade unions) and take account of relevant information in order to determine our gender equality objectives
5. to assess the impact of our current and proposed policies and practices on gender equality
6. to implement the actions set out in our scheme within three years, unless it is unreasonable or impracticable to do so
7. to report against the scheme every year and review the scheme at least every three years.

Note: The GOC should have published its scheme by 30 April 2007.