

## **Equality and Diversity Monitoring Consultation**

---

The General Optical Council (GOC) has, through its Registration Committee, been considering a scheme to collect and monitor equality and diversity data about its registrants. The scheme will enable us to meet new statutory requirements to report to Parliament on equality issues, and to meet the objectives set out in our Equality and Diversity Scheme and Action Plan.

The aim of this consultation is to clarify the principles that will underpin our systems for equality and diversity monitoring.

We are asking for your views on these principles and the Committee's recommendations for implementing the scheme. You are also invited to comment on the draft monitoring form (Annex 1).

The deadline for responses is 5pm on 30 June 2008.

Responses can be emailed to [jburrow@optical.org](mailto:jburrow@optical.org) or sent by post to:

Kate Fielding  
Head of Communications  
General Optical Council  
41 Harley Street  
London  
W1G 8DJ

## About the General Optical Council

The General Optical Council (GOC) is the statutory body which regulates optometrists and dispensing opticians and corporate bodies carrying on business as optometrists or dispensing opticians in the UK.

The Council's main objective is to protect, promote and maintain the health and safety of the public. The Council has the general function of promoting high standards of professional education, conduct and performance among registrants.

## Background to the consultation

In February 2007, the government published its White Paper *Trust, Assurance and Safety – the Regulation of Health Professionals in the 21st Century* which set out a programme of reform to the UK system of regulation of health professionals. As part of the recommendations in the White Paper for improving the way concerns about health professionals are managed both locally and nationally, each regulator is required to report to Parliament information on equality issues relevant to regulation within its profession; analyses of any trends in ethnicity in its fitness to practice proceedings; and an account of the action taken to ensure fairness in the way that regulatory action is conducted.

## Equality and diversity monitoring

The Council approved an equality and diversity scheme and action plan in November 2007. The scheme identifies strategic objectives for ensuring 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 Practice processes
- employment with or appointment to the GOC, its Council and committees

One of the Council's first priorities is to develop the collection of data 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.

## Implementation timetable

The following implementation timetable is planned:

Action	Date
Publish consultation document	w/c 21 April 2008 (allow 10 weeks)
Review and analyse responses, and prepare paper for GOC Registration Committee	From 1 July 2008
Make any changes arising out of consultation process	July/August 2008

Approve revisions to equality and diversity monitoring processes at GOC Registration Committee	11 September 2008
Implementation starts: - student registration - individual registration - retention cycle 2009/10	from end September 2008

## Principles for equality and diversity monitoring

The GOC Registration Committee considered and agreed the following principles for an equality and diversity monitoring scheme.

### **1. It is important to obtain a high response rate so that analysis is both accurate and proportionate.**

Unless a high percentage of registrants return their forms, we will not be confident about the figures, and may not be taking the right action as a result. For example, ethnic minority registrants may disproportionately choose not to return the form, as a result of concerns about the use of data. Other regulators' experience has shown that including the form as part of statutory registration/retention documents is effective in encouraging a high response rate. At least one regulator is making a return compulsory.

### **2. It is essential that the Council maintains data which is accurate and up to date. It needs to be able to reflect statistically significant data when analysing patterns in relation to registrants involved in fitness to practice processes.**

Anonymous return of monitoring data would only provide the Council with a 'snapshot' at any particular moment in time. Furthermore, anonymised data submitted at different times would make accurate analysis even more difficult. The Council would not be able to update data when registrants joined or left the register.

Anonymised returns would not enable the Council to report to Parliament on trends relating to fitness to practice investigations and hearings unless registrants were asked to complete a separate monitoring form when an investigation was opened. The Council's view is that this would create unnecessary anxiety for the registrant.

The storing of data against an individual's record on the GOC database would allow the build up of data over a number of years whilst maintaining confidence in its accuracy and enabling analysis against other data (eg FTP).

### **3. An individual's equality monitoring data should never be made publicly available.**

There may be concerns when data is stored against individual registrants' records that it might be published as part of the Register or become available to third parties. The GOC takes its data protection responsibilities very seriously and will ensure it meets its obligations under the Data Protection Act by ensuring appropriate policies and procedures are in place.

#### **4. Internal GOC access to individuals' equality and diversity data should be restricted and controlled.**

There will need to be internal access to equality data for data entry, update and analysis. There may be concerns from data subjects that data could be misused if it is accessible by those involved in the investigation of allegations or those making decisions about registration or retention. The GOC will need to ensure that individuals within the GOC who are involved in these processes do not have access to equality and diversity data.

#### **5. Where possible, the GOC should coordinate monitoring systems with other regulators to allow statistical comparisons across the healthcare professions.**

Comparison of equality and diversity statistics across the healthcare professions will improve our ability to spot trends which may merit further investigation or action – both as individual regulators and as a sector. Where we are collecting the same information, we should try to do so in a way that allows comparison. For example, if all regulators were asking for information about ethnic origin, it would be helpful to use the same categories. Different regulators are at different stages of their data monitoring and it may not be possible to achieve a single, shared monitoring form. Some regulators may ask for more or less information than others. Sharing individual data with other regulators is not envisaged at the current time.

#### **Recommendations**

- 1. Completion of the monitoring form should be optional, but it should be included as part of the individual registration, retention and restoration forms to ensure a high response rate.**
- 2. Equality and diversity data should be stored against an individuals record.**
- 3. Data should only be published in an aggregated and anonymised form.**
- 4. Individuals' equality data should be restricted to those with a legitimate need to access or use it. Audit mechanisms should track who has accessed records.**
- 5. The GOC should participate in the joint regulators' Equality and Diversity Forum and review our monitoring forms and systems as necessary to promote harmonisation.**

#### **Consultation questions**

- A. Do you agree with the principles for equality and diversity monitoring?
- B. Do you agree with the recommendations?
- C. Do you have any comments on the draft monitoring form (Annex 1)?