External Consultation on:
GOC Equality, Diversity and Inclusion strategy

April 2017
Executive summary

1. We consulted on our draft EDI scheme which covers the three year period from April 2017 to March 2020.

2. The consultation sought feedback on three strategic EDI priorities which are underpinned by the GOC strategic objectives:
   - the learning and development of optical professionals;
   - a targeted approach to regulation; and
   - organisational transformation.

3. Responses to the consultation have helped us to develop the final version of our EDI strategy.

About the GOC

4. We are the regulator for the optical professions in the UK. We currently register around 29,000 optometrists, dispensing opticians, student opticians and optical businesses.

5. The GOC has four main functions:
   - setting standards for optical education and training, performance and conduct;
   - approving qualifications leading to registration;
   - maintaining a register of those who are qualified and fit to practise, train or carry on business as optometrists and dispensing opticians; and
   - investigating and acting where registrants' fitness to practise, train or carry on business is impaired.

6. More information about the GOC can be found on our website: https://www.optical.org/

Consultation approach and methodology

7. We undertake consultations with reference to the principles of good regulation, seeking to ensure that our approach is proportionate, targeted, consistent, transparent, accountable and agile.

Public consultation

8. The public consultation was open for six weeks and ran from 28 February 2017 – 12 April 2017. We received a total of six external responses. This comprised of one response from individual and five responses from organisational stakeholders:
   - College of Optometrists;
   - SeeAbility;
   - Megafocus Wales;
   - Optometry Wales;
8.5. Equality Networking group member; and
8.6. One individual registrant.

9. We thank all those who responded for their feedback.

**Consultation responses**

**Overview**

10. The responses were generally unanimous in themes:

- linking the EDI objectives to the strategic plan is good;
- further outcomes should be included within the Learning and Development objective; and
- stakeholders are keen to be involved. EDI is important to them and how they work, and also how they want the sector to incorporate this essential practice, with Education as a significant cornerstone.

**Question 1. What are your views on the proposed EDI objectives?**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Consultation Response</th>
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</thead>
<tbody>
<tr>
<td>Equality Networking group member</td>
<td>Good as they clearly relate to the strategic objectives of the GOC</td>
</tr>
<tr>
<td>Seeability</td>
<td>We welcome the focus on ensuring registrants understand their responsibilities to deliver services tailored to their patients' needs and to build your evidence base.</td>
</tr>
<tr>
<td>Megafocus Wales</td>
<td>The EDI objectives are clear and constructive. Megafocus Wales welcome the objectives set and are happy to endorse them. We believe it is positive way forward to meet the needs of GOC strategic objectives and takes into account the need to work within diverse communities.</td>
</tr>
<tr>
<td>Optometry Wales</td>
<td>Optometry Wales believes that the Equality, Diversity and Inclusion (EDI) scheme has some robust and targeted objectives. We welcome the fact that each of the EDI objectives reflect the GOCs strategic objectives.</td>
</tr>
<tr>
<td>Individual</td>
<td>The proposed EDI work is fair, proportionate and should facilitate the GOC in achieving their functions. EDI objectives are thorough and usefully grouped into regulation learning and teaching and organisational themes.</td>
</tr>
<tr>
<td>College of Optometrists</td>
<td>The College of Optometrists believes that the Equality, Diversity and Inclusion (EDI) Scheme has sensible and targeted objectives. They fully comply with the GOC’s equality duties. We welcome the fact that each of the EDI objectives relates to the GOC’s strategic objectives. We also welcome the inclusion of example actions to achieve each of the EDI objectives.</td>
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**Action taken**

No action required.
Question 2. What are your views on the outcomes we hope to achieve?

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<td>Equality Networking group member</td>
<td>Fit well with the objectives</td>
</tr>
<tr>
<td>Seeability</td>
<td>We would be very happy to work with the GOC on reviews of education and training, and to support research into the experiences of people with learning disabilities. We are extremely supportive of the strategic focus on 'better ocular outcomes for people with learning disabilities' and have been delighted that our 2016 report 'Delivering an equal right to sight' has helped shape the GOC's thinking so far on the experiences of people with learning disabilities.</td>
</tr>
<tr>
<td>Megafocus Wales</td>
<td>The outcomes and the monitoring process may be difficult to standardise at first, but we believe with clear vision and control of the situation it should be achievable. The monitoring process should be transparent. The clear measurable outcomes in terms of employment, training and reducing barriers are all positive and constructive methods of the EDI agenda.</td>
</tr>
<tr>
<td>Optometry Wales</td>
<td>We believe that the desired outcomes will be achievable both for the GOC as regulator and the registrants in practice.</td>
</tr>
<tr>
<td>Individual</td>
<td>The outcomes are reasonable but may be difficult to measure. Reporting on outcomes should be transparent and open.</td>
</tr>
<tr>
<td>College of Optometrists</td>
<td>We believe that the desired outcomes are rightly responding to the EDI Scheme. We welcome the fact that these outcomes are achievable in a daily professional activity and from the perspective of both the GOC and the registrants</td>
</tr>
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</table>

**Action taken**

We will promote our Approach to EDI Monitoring statement\(^1\) and ensure we include measurement of achievement of outcomes within our annual EDI monitoring report where possible, and certainly within the EDI Strategy evaluation.

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**Question 3. Are there any important outcomes that you wish to see but which we have not included?**

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<td>Equality Networking group member</td>
<td>Possibly the use of quantitative outcomes, such as 100% of all newly qualified entrants.</td>
</tr>
</tbody>
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\(^1\) [http://www.optical.org/filemanager/root/site_assets/edi/our_approach_to_equality_diversity_and_inclusion_edmonitoring_statement.pdf](http://www.optical.org/filemanager/root/site_assets/edi/our_approach_to_equality_diversity_and_inclusion_edmonitoring_statement.pdf)
### Respondent | Consultation Response
--- | ---
Seeability | We would like to see registrants in England aware of their responsibility to provide information in an accessible format upon request, in line with the NHS Accessible Information Standard, as we believe that awareness amongst the optical sector remains low.

Megafocus Wales | The need to recognise the importance and benefits of EDI should be the forefront of employee, student and member training.

Optometry Wales | We believe that in the context of learning and teaching the GOC might wish to consider ensuring that education establishments understand their EDI responsibilities.

Individual | For learning and teaching they could also include that education establishments understand their EDI responsibilities, including to their students.

College of Optometrists | We do not see any other outcome that should be included.

### Action taken
We have reviewed the outcomes for the Learning and Development and included more specific outcomes within this section. We agree that quantitative outcomes would be beneficial for demonstrating our view that all registrants, organisations and businesses should recognise the importance of EDI within their daily role. We will consider the measurable information available to us which will enable us to report a quantitative outcome within our annual EDI report.

### Question 4. What are your views on how to further diversify and expand the participants of our consultation and research activity?

| Respondent       | Consultation Response                                                                                                                                                                                                 |
--- | ---                                                                                                                                                                                                                       |
Seeability        | SeeAbility would be delighted to work with the GOC and our peer educator networks are self advocates of people with learning disabilities who are actively looking to improve local eye care services on the ground. They could provide a useful forum for GOC’s work on consultation and research. SeeAbility’s own strategy going forward will have a focus on research and there could be opportunities to work with the GOC to identify where access or experiences are not so good - for example in terms of dispensing of glasses, access to the right glasses, or in domiciliary environments (including care homes).  

Megafocus Wales   | MEGAFOCUS (Minority Ethnic Groups Association for Ophthalmic Care Uptake and Service) will be happy to help with this. We would be happy to share the Welsh Government initiative to provide free enhanced eye test for high risk groups including certain Black and Ethnic Minority communities. MEGAFOCUS has been involved with strong partnership projects to improve community’s engagement with eye care and we would be happy to share the learning from those projects.  

Consultation report on the EDI strategy

Respondent | Consultation Response
---|---
Optometry Wales | We believe that the GOC is engaging in an open and transparent way with stakeholders and we note the value of the stakeholder updates (although last published in 2012). We would also suggest that the GOC might wish to consider the vital work recognised by Welsh Government and using patients who have accessed free, enhanced eye care services in Wales because they are at risk of eye disease due to their ethnicity and the work of the Megafocus (Welsh Government Stakeholder Group who look at how to increase uptake of eyecare services for BME groups).

Individual | Using patients who have accessed enhanced eye care services in Wales because they are at risk of eye disease due to their ethnicity.

College of Optometrists | We believe the GOC is rightly engaging with external stakeholders, e.g. through consultations, public perceptions surveys and registrant surveys. But without knowing who the GOC is already consulting and engaging with, it is difficult to assess how the GOC could further diversify and expand the participants of your consultation and research activities. However we would suggest the GOC to continue publishing its regular GOC Stakeholder Updates as the last one published on your website is dated 2012.

Action taken
We welcome the suggestions given above and we look forward to working more closely with respondents and other organisations in future.

With regards to the GOC Stakeholder Update. This was replaced by the e-bulletins in 2012, and these are also published on our website: https://www.optical.org/en/news_publications/Publications/ebulletin.cfm. We welcome any comments regarding the e-bulletin, including requests for articles. Please contact our Communications Department for further discussion.

Question 5. Are you aware that we publish an annual EDI monitoring report?

| Respondent | Consultation Response | Comments |
---|---|---|
Equality networking group member | Yes | There appears to be a fairly good awareness of our monitoring report, although we should continue to consider alternative ways to promote this further. |
Seeability | Yes | |
College of Optometrists | Yes | |
Megafocus | No | |
Please let us know any further comments regarding our Equality, Diversity and inclusion work or activities:

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<tr>
<td>Seeability</td>
<td>It may be helpful for GOC to bring together other partners in the sector, including NHS England and the OCCS and Healthwatch in any activities that will focus on the agenda to provide reasonable adjustments in NHS care. They may have additional intelligence to offer.</td>
</tr>
</tbody>
</table>
| Megafocus Wales     | It is a positive step forward and we look forward to working with you. MEGAFOCUS is an advisory group within Welsh Eye Care, which has the primary remit in ensuring Minority Ethnic Communities access eye care. We examine barriers to access, plan and delivery projects to improve access. We engage with training and research work with minority communities and health professionals along with monitoring and reviewing ethnicity data. Members of MEGAFOCUS include representatives from:  
  • Statutory agencies  
  • Welsh Government, Eye Health Examination Wales, Clinical Lead  
  • Wales Optometry Postgraduate Education Centre (WOPEC)  
  • Third Sector (Sight Cymru, RNIB, Guide Dog)  
  • Wales Optometric Committee (WOC)  
  • Optometry Wales (OW)  
  • Ophthalmology in Wales  
  • All seven health boards in Wales  
  • Patient representatives  
  • Community Health Council                                                                                                                                                                                                                                                                                                                                                           |
| Optometry Wales     | We would suggest that ‘Equality, Diversity and Inclusion Scheme’ has negative connotations and suggests a temporary service rather than establishing a firmly implemented initiative or service.                                                                                                                                                                                                                                                                                                                                                     |
| Individual          | Equality, Diversity and Inclusion Scheme does not need the word ‘Scheme’. This word has negative connotations in the US. Encourage business and education establishments to consider and be aware of their EDI responsibilities.                                                                                                                                                                                                                                                                                                             |

**Action taken**

The word Scheme was originally chosen to reflect the Equality Act. The feedback is very useful and in order to ensure that any negative connotations are avoided, we have amended the word ‘Scheme’ to ‘Strategy’. We feel it is really important that businesses and education establishments consider their EDI responsibilities.