

COUNCIL

Draft Equality, Diversity and Inclusion Scheme 2014-17

Meeting: 12 February 2014

Status: for decision

Lead responsibility: Nicola Ebdon
(Head of Governance)

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Purpose

1. We present the draft Equality, Diversity and Inclusion (EDI) Scheme for consideration and approval prior to public consultation. The draft consultation document is attached at **Annex 1**.
2. Council is asked to:
 - 2.1 **consider** and **approve** the draft Equality, Diversity and Inclusion Scheme attached at Annex 1 for public consultation, taking into account Council's views on the questions in paragraph 17 of this paper;
 - 2.2 **consider** how Council and the GOC should demonstrate visibly our commitment to and leadership of EDI (paragraphs 22 to 24 of this paper);
 - 2.3 **consider** the issues in relation to the deliverability (paragraphs 25 to 27 of this paper);
 - 2.4 **consider** and **agree** a twelve week public consultation on the draft EDI Scheme and Action Plan, from Friday 21 February 2014 to Monday 19 May 2014, in order that a final version can be presented to Council for approval at its 23 July 2014 meeting;
 - 2.5 **delegate authority** to the Chair and Director of Resources to sign off the final version of the Scheme for consultation;
 - 2.6 **note** that the Executive will begin working to the draft Scheme with immediate effect; and
 - 2.7 **agree** timing of future reports to Council on our EDI progress (paragraph 46 of this paper).

Strategic Objective

3. Development of an equality scheme forms part of the Equality and Diversity project which is included in the 2013/14 business plan. The project as a whole falls into the strategic aim of developing integrated systems and processes which are efficient and cost effective – with the aim of ensuring open, transparent and robust governance. The Director of Resources is the project

sponsor and the project managers are the Head of Governance and Governance Manager.

Background

4. Promoting equality, diversity and inclusion is an essential component of good governance.

The Equality Act 2010 and the public sector Equality Duty

5. The Equality Act 2010 came into force on 1 October 2011 and applies to all organisations that provide a service, sells goods or provides facilities to the public or a section of the public. The Act includes a new public sector equality duty which replaces separate duties on public bodies relating to the protected characteristics of race, disability and gender equality – and also covering age, sexual orientation, religion or belief, pregnancy and maternity and gender reassignment. The public sector equality duty applies to bodies carrying out public functions.
6. Under the Equality Act 2010, the GOC has statutory duties as an organisation providing a public service, covering all nine protected characteristics¹. We must, in the exercise of our functions, have due regard to the need to:
 - 6.1 eliminate discrimination, harassment and victimisation;
 - 6.2 advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
 - 6.3 foster good relations between people who share a protected characteristic and those who do not;
 - 6.4 promote positive attitudes towards disabled people;
 - 6.5 encourage the participation of disabled people in public life; and
 - 6.6 take account of a disabled person's disabilities even if this means treating the disabled person more favourably.

Other relevant legislation/oversight

7. The GOC is required by section 32A(1) of the Opticians Act to include information in its Annual Report regarding the arrangements the Council has put in place to ensure that it adheres to good practice regarding equality and diversity. The annual report is submitted to the Charities Commission and Privy Council, and is laid before Parliament.
8. The PSA also monitor regulators' performance regarding equality and diversity. The PSA indicated in its 2009/10 Performance Report to the GOC that in the

¹ The nine protected characteristics are: age; disability; gender reassignment; race; religion or belief; gender; sexual orientation; marriage and civil partnership; pregnancy and maternity.

2010/11 report it would be following up on progress made by the GOC on the implementation of internal audits of decisions taken that look at, amongst other things, equality and diversity issues. The PSA has not pursued this point in detail since 2010, but they may focus on this in the future. The majority of other healthcare professions regulators have current equality schemes and action plans. The Equality and Human Rights Commission places great emphasis on action planning and delivery of priorities, as opposed to the development of the Scheme as an end in itself.

Equality Scheme and Action Plan development to 2012

9. The GOC developed its first Equality and Diversity Scheme and Action Plan in 2007, for the period 2007 to 2009. An updated Scheme and Action Plan was developed in 2010 for the period 2010 to 2012². The Scheme was updated to respond to requirements under various pieces of UK law, including the Equality Act 2006, and various employment equality regulations and progress against the Action Plan was reported to Council on a relatively regular basis.
10. Since publication of the GOC's second scheme and action plan, we have progressed a number of strands of work in relation to equality and diversity issues, including the following (as detailed in the draft Scheme):
 - 10.1 our staff undertook equality and diversity training in 2010, and members of our Fitness to Practise Committee undertook equality and diversity training in October 2012. We organised training for all Council members in November 2012 on equality and diversity, in particular the Equality Act 2010 and the public sector duties;
 - 10.2 our website now meets Web Content Accessibility Guidelines 2.0 (Level AA) accessibility standards and we make publications available in large text and languages other than English on request;
 - 10.3 to help improve access to the profession, we have produced guidance for students with disabilities and other health conditions;
 - 10.4 we require training providers that we accredit to have an equality and diversity statement, and also require them to ensure that their assessment processes treat everyone fairly;
 - 10.5 trainee optometrists and dispensing opticians are taught and assessed on a number of competencies relating to equality and diversity issues;
 - 10.6 we conducted an equality impact assessment for the Continuing Education and Training (CET) project;
 - 10.7 we revised our staff policies and procedures - as part of this process checked that all our HR policies and procedures reflect our statutory duties and equality and diversity commitments;

² http://www.optical.org/en/about_us/equality-and-diversity.cfm

- 10.8 in summer 2013 we developed and provided guidance to Council and selection panels undertaking the appointment of Council and committee members. The guidance can be found here:
http://www.optical.org/en/about_us/our-governance/index.cfm;
- 10.9 we developed a diversity monitoring form to ensure that information could be collected from various groups in order to monitor efforts to ensure diversity - the forms covered seven of the protected characteristics i.e. age; disability; race; religion or belief; sex; sexual orientation; marriage and civil partnership. We used the form:
- during the recruitment process for new Council and committee members and for a new member of the Investigations committee;
 - to capture data on current Council and committee members;
 - to capture data on staff; and
 - during the recruitment process for staff.
- 10.10 we also used the diversity monitoring form to survey registrants as part of a stakeholder perception survey completed in January 2013. We received responses from 10% of all registrants (1,353 responses). While the data does not provide a complete picture of all our registrants, analysis of the data is broadly in line with the trends reported in our 2009/10 monitoring report. An analysis of the 2013 data will be published alongside the final Scheme in July 2014 in accordance with our duties;
- 10.11 we have continued to operate in accordance with the commitments set out in our Welsh Language Scheme – we have adopted the principle that in conducting our public business in Wales, we will treat the Welsh and English languages on the basis of equality. Our Welsh Language Scheme identifies how we administer this principle when providing services in Wales;
- 10.12 we developed guidance on reasonable adjustments covering both Council and committee members and also staff - and monitor the requests we receive;
- 10.13 in October 2013 our Remuneration Committee took EDI considerations into account in revising our expenses policy. The policy now refers to areas where the GOC had a responsibility with regards to equality and diversity, such as costs relating to childcare, carers and dependents and any costs associated with making ‘reasonable adjustments’ (such as braille/audio recording, taxis for those with mobility difficulties, costs associated with support workers). It is now clear to users of the policy what they can and cannot claim for and where ‘prior or case by case approval’ is required; and
- 10.14 in the retender for our consumer complaints service (January 2014) we reviewed whether the third parties bidding to exercise this part of our public function on our behalf were aware of our equality duties and took them into account.

Analysis

11. The 2010 Equality and Diversity Scheme and Action Plan was developed under the previous legislative framework governing equality and diversity, which was more prescriptive than that introduced by the new Equality Act. We have the flexibility under the new legislation to formulate a Scheme which is fit for purpose and meets our needs as a responsible, forward thinking and principled regulator. The draft Scheme aims to deliver:
 - 11.1 a timetabled, evidence-based plan of action for meeting the general duties in the Equality Act;
 - 11.2 actions that are prioritised on those areas of our work and issues that are most immediate and of most relevance to equality, diversity and inclusion (such as training and monitoring); and
 - 11.3 an approach which looks to embed and promote equality and diversity within our business planning processes, and which demonstrates our commitment to meeting our legislative requirements and looks towards the active promotion and valuing of EDI in the future.

12. The draft GOC Scheme has been informed by research of a number of other organisations' equality and diversity schemes, including those of some of the other health regulators, and also the Equality and Human Rights Commission and the Professional Standards Authority. Analysis was undertaken as follows: whether the body had an action plan attached to its Scheme; whether it had monitoring arrangements in place; whether training was taking place; whether equality impact assessments were being undertaken for new policies; and, whether annual reporting was in place.

13. Fourteen bodies were reviewed³ and the key themes were as follows:
 - 13.1 two organisations have schemes which are dated 2007 and which are therefore not compliant with the Equality Act 2010;
 - 13.2 the majority publish an action plan with their equality scheme - some have this as a detailed plan with timings and others integrate actions within the scheme;
 - 13.3 a good number routinely provide training and conduct equality impact assessments, which is documented in their schemes, although for some it was difficult to make an assessment on how this is conducted in practice based on the information available on their website; and
 - 13.4 the majority have established monitoring systems and half are producing annual monitoring reports in accordance with the requirements of the

³ General Medical Council, General Dental Council, General Pharmaceutical Council, General Osteopathic Council, Nursing and Midwifery Council, Health and Care Professions Council, PSA, Ofcom, Equality and Human Rights Commission, Legal Services Board, Solicitors Regulation Authority, Office for Rail Regulation, Health and Safety Executive and Ofqual.

Equality Act 2010.

14. The Scheme has been developed to be consistent with the annual report, strategic plan and our mission and values.
15. The structure of the Scheme follows best practice, is consistent with other regulators scheme's, and sets out the background to the organisation, our commitment to EDI, our EDI objectives, and our equality duties. We do not expect our commitment to EDI and our EDI objectives to change over time but they may be refined as our knowledge in this area develops. It is against these that we plan to assess our progress annually.
16. The Scheme for 2014-17 (page 18 of annex 1) sets out a number of activities against each of our seven objectives. These activities are linked to the work programmes and projects in our 2014/15 business plan. Subject to responses received during the consultation, our intention is to develop an action plan for 2014-17 based on the activities set out on pages 18 to 21 of the Scheme (at annex 1), which will be published alongside the final version of the Scheme in July 2014.
17. Council's views are sought in particular in relation to the following points:
 - 17.1 **Our commitment to equality, diversity and inclusion** – this is set out on page 10 of the Scheme – it is recommended that Council **consider** and **agree** whether this section articulates what Council intends should be reflected in such a statement for the long term.
 - 17.2 **Our equality, diversity and inclusion objectives** – these are articulated on pages 11 and 12 of the document, and are then used later in the document as a way of framing our intended activities. It is recommended that Council **consider** and **agree** whether these are the right objectives for the GOC for the long term.
 - 17.3 **Activities for 2014-17** – Council is invited to **consider** and **agree** if the activities set out on pages 18 to 21 are the right actions to be pursuing during this Scheme.
 - 17.4 **Consultation questions** – we have included a number of questions that we would like those responding to the consultation to answer. These are set out on page 6 of the Scheme. Responses to these questions will help us to develop the final version of our Equality, Diversity and Inclusion Scheme and our action plan. It is recommended that Council **consider** and **agree** these questions, which for ease of reference are as follows:

Question 1: Do you have any comments on our Equality, Diversity and Inclusion Scheme?

Question 2: Is there anything else we should consider including in our scheme? Particularly if you have any suggestions for how it could be improved.

Question 3: What can we do to improve our monitoring data response rates and ensure that the data we collect is comprehensive and accurate?

Question 4: Which of the nine protected characteristics should we be gathering monitoring data for registrants, Council and Committee members and staff? Please explain why, particularly if you think we should gather different data for different groups.

18. The draft EDI Scheme has been reviewed by the Executive and considered by the Executive champion for equality, diversity and inclusion (Josie Lloyd), as well as discussed at meetings of the Management Forum and Senior Management Team. It reflects input from the two Council members who are champions for this work: Gareth Hadley and Liam Kite, and also comments from Morag Alexander. Key issues arising from these discussions are set out below.

Feedback from the Management Forum

19. The following points were raised by the Management Forum and have all been taken into account in finalising the draft Scheme for Council:
- 19.1 an endorsement that the approach was welcomed, timely and appropriate in general terms;
 - 19.2 ensure clarity about our obligations and the reasons why we are publishing a Scheme;
 - 19.3 take care in relation to how we communicate our intentions for monitoring, particularly with registrants and other external stakeholders;
 - 19.4 the importance of data collection as the first and most important phase of the work, and the significance of needing to make progress on monitoring;
 - 19.5 balance our obligations in relation to EDI with available resources to support delivery of the Scheme; and
 - 19.6 reference our EDI work in the final draft Strategic Plan 2014 to 2017 and draft Stakeholder Engagement Strategy.

Feedback from the Senior Management Team

20. The following points were raised by SMT and have all been taken into account in finalising the draft Scheme for Council:
- 20.1 ensure a simple and manageable set of activities, to get us to where we need to be as quickly as possible and ensure the scale and scope of the Scheme is reflective of our size, capacity and level of resource; and
 - 20.2 reduce the number and length of consultation questions.

Feedback from Gareth Hadley, Liam Kite and Morag Alexander

21. The following points were raised by the non-executives whom we consulted, and have all been taken into account in finalising the draft Scheme for Council:
- 21.1 ensure that our intended action plan is realistic (a draft action plan has been removed and will be reviewed in light of consultation responses. A list of possible activities have been included in the draft Scheme to help obtain feedback on priorities);
 - 21.2 link the activities to the business plan in order to integrate equality, diversity and inclusion (a list of possible activities, clearly linked to the business plan work programmes and projects have been included in the draft Scheme); and
 - 21.3 focus on service delivery (a separate service delivery objective has been included to combine all related activities under one objective.

Demonstrating visibly our commitment to EDI

22. We are committed to ensuring that equality, diversity and inclusion is led from the very top of the organisation and have therefore identified equality, diversity and inclusion champions to help us progress the EDI work within the GOC.
23. The Chair of the General Optical Council, Gareth Hadley and Council member Liam Kite are our non-executive champions, and Josephine Lloyd, the GOC's Director of Resources, is championing our work on behalf of the Executive. They will be taking an active part in ensuring the scheme and accompanying action plans are developed in line with our duties and capabilities and are implemented effectively.
24. Council is invited to **consider** and submit views in relation to other ways in which the GOC could demonstrate visibly our commitment to and leadership of EDI.

Deliverability

25. The resources to deliver the Scheme has been included in the 2014/15 budget. This includes a small budget for engagement, budget to provide training for the areas of highest risk and inclusion of the work to develop our monitoring via the CRM and website (if there are issues with the timing of the changes to CRM and the website, the need for alternative methods of monitoring will need to be considered, which have not been included in the budget).
26. To ensure we start the process of embedding EDI in the organisation, there will be an impact on resources to progress activities and all undertake training. The majority of the resource will come from the Governance team as well as HR, however all teams will need to be involved. Due to our size, we need to ensure that resource is allocated appropriately to areas of highest risk and priority. We will therefore be using the consultation responses to assess the activities which

are of the highest priority and to make an assessment as to the deliverability of the work, to inform the final version of the Scheme and a draft Action Plan for 2014-17.

27. Council is invited to **consider** the issues in relation to deliverability of the Scheme.

Consultation period

28. Council is invited to **consider** and **agree** a twelve week public consultation on the draft EDI Scheme, from Friday 21 February 2014 to Monday 19 May 2014, in order that a final version can be presented to Council for approval at its 23 July 2014 meeting. This will allow sufficient time to engage our internal and external stakeholders and secure a wide range of responses, and sufficient time to analyse consultation responses and return to Council with a final draft Scheme and Action Plan.
29. Council should note that the Executive will begin working to the new Scheme, in draft, with immediate effect to help ensure we are meeting our EDI requirements.

Impact

30. In preparing the draft EDI Scheme, input has been sought from the Executive as to the implications of the work.
31. The recommended approach would have the following implications on:
 - 31.1 **GOC's reserves** – no expected implications;
 - 31.2 **GOC budget** – budget to carry out the activities has been included in the 2014/15 budget (including a small budget for engagement, budget to provide training for the areas of highest risk and inclusion of the work to develop our monitoring via the CRM and website - if there are issues with the timing of the changes to CRM and the website, the need for alternative methods of monitoring will need to be considered, which have not been included in the budget).;
 - 31.3 **Legislation** – the relevant implications are set out in the Scheme and also in paragraphs 5 and 6 above;
 - 31.4 **Resources** – a commitment to meet our legislative requirements and effective equality, diversity and inclusion has resource implications. Specific resource implications will be determined by the approach taken to implement the Scheme as detailed in our action plan which will be developed following consultation. The development and implementation of the Scheme requires engagement and ongoing involvement with staff, registrants and our wider stakeholders.
 - 31.5 **Equality and Diversity** – no adverse implications are expected although a

positive impact is of course expected in pursuing the work in the manner described in the Scheme and Action Plan; and

- 31.6 **Human Rights Act** – no adverse implications are expected although a positive impact is expected in pursuing the work in the manner described in the Scheme and Action Plan.

Devolved Nations

32. The Equality Act 2010 does not apply to Northern Ireland, but for many years has placed requirements on public bodies regarding the prevention of discrimination on religious and political belief. The legislation is very similar to the Great Britain legislation and there are plans to reform the legislation in Northern Ireland to make it consistent with the rest of the UK.
33. Ongoing consideration will be given to the implications arising from differing legislation in the devolved nations. Consideration will also be given as to whether the EDI Scheme should be published in Welsh.

Communications

34. Communicating the Scheme and related action is an important part of our EDI strategy.
35. To ensure that the Scheme evolves to meet the needs of our stakeholders, we are committed to working in conjunction with them. We plan to steadily increase our engagement with stakeholders and representative groups as resources allow and we are committed to being inclusive, particularly with those perceived as hard to reach groups. Engagement and involvement will play an increasingly significant role in the future.
36. In development of our work in this area, we will engage with staff to support them in understanding their role in developing and delivering actions, embedding them into business planning and in ensuring appropriate reporting.
37. We will pay particular attention to identifying and engaging with groups and individuals who in the past have been under-represented in the health care agenda. We will do this by working with advocacy and representative organisations and seeking their guidance about best practice.
38. We want to be able to ensure our Scheme demonstrates that we understand what the most important issues are for the GOC in relation to equality, diversity and inclusion. We will engage and involve diverse interest groups in the development and implementation of our work on an ongoing basis.

39. We are members of the healthcare regulators' Equality and Diversity Forum, with which we will continue to engage, and also the Equality and Human Rights Commission's Regulators, Inspectorates and Ombudsman forum.

Risks

40. Failure to adopt the Scheme and follow action plans incur the following risks:
- 32.1 the GOC may be prosecuted under the Equality Act 2010;
 - 32.2 equality and diversity perspectives of persons who share a relevant protected characteristic do not inform the GOC's work, and so Council does not optimise the public benefit of its efforts;
 - 32.3 the GOC does not secure the confidence of the public;
 - 32.4 the GOC suffers reputational damage with the profession, PSA, EHRC and other stakeholders; and
 - 32.5 our EDI responsibilities are included on our corporate risk register, however our risks in this area will start to be mitigated as we carry out our Action Plan.

Recommendations

41. Council is asked to:
- 41.1 **consider** and **approve** the draft Equality, Diversity and Inclusion Scheme attached at Annex 1 for public consultation, taking into account Council's views on the questions in paragraph 17 of this paper;
 - 41.2 **consider** how Council and the GOC should demonstrate visibly our commitment to and leadership of EDI (paragraphs 22 to 24 of this paper);
 - 41.3 **consider** the issues in relation to the deliverability (paragraphs 25 to 27 of this paper);
 - 41.4 **consider** and **agree** a twelve week public consultation on the draft EDI Scheme and Action Plan, from Friday 21 February 2014 to Monday 19 May 2014, in order that a final version can be presented to Council for approval at its 23 July 2014 meeting;
 - 41.5 **delegate authority** to the Chair and Director of Resources to sign off the final version of the Scheme for consultation;
 - 41.6 **note** that the Executive will begin working to the draft Scheme with immediate effect; and
 - 41.7 **agree** timing of future reports to Council on our EDI progress (paragraph 46 of this paper).

Timeline for future work

42. Once approved by Council the draft EDI Scheme will be published for consultation. We will consult proactively with staff, external stakeholders and our Statutory Advisory Committees during the consultation period.

43. The consultation will close on 19 May 2014. Consultation responses will be analysed, and a final draft Scheme and action plan for 2014-17 will be presented together with the consultation response analysis and an analysis of our 2013 monitoring data, to Council on 23 July 2014.
44. Publication of the final Scheme, action plan and monitoring data on the GOC website will follow Council's approval.
45. We will continue to publish high level equality data about the profession. Our annual report will include details of the arrangements that Council has put in place to ensure that we adhere to good practice regarding equality and diversity and progress made against our objectives.
46. The Executive will provide a report on progress in 2014/15 to the February 2015 Council meeting, with recommendations for any updates to the EDI Scheme. The intention would be to return to Council annually on this basis.

Attachments

Annex 1 – Draft Equality, Diversity and Inclusion Scheme 2014-17



V11 31 January 2014

Draft for consultation

Equality, diversity and inclusion scheme 2014 - 2017

[Insert corporate front cover image]

February 2014

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Introduction

This document seeks the views of stakeholders on our draft Equality, Diversity and Inclusion (EDI) Scheme 2014 – 2017 (Scheme). We hope this consultation will be of interest to registrants, professional bodies, partner organisations, patient representative groups and members of the general public.

We have included a number of questions that we would like those responding to this consultation to answer. Responses to these questions will help us to develop the final version of our EDI Scheme which will be considered for approval by our Council in July 2014.

The consultation will run for twelve weeks **from 21 February to 19 May 2014** and applies to the whole of the UK.

How to respond

We welcome all responses to this consultation and we will consider the final Equality, Diversity and Inclusion Scheme 2014 – 17 in light of the responses we receive. You can download further copies of this document and the response form from our website, or you can contact us if you would like us to send you a copy of this document.

Please contact us to request a copy of this document in an alternative format or in Welsh.

The deadline for responses to this consultation is **19 May 2014**.

A consultation response cover sheet is attached to this document. You can either complete the first page of the cover sheet and provide a separate written response or you can complete the first page of the cover sheet and respond to the questions as set out on the second page of the cover sheet.

Responses should be sent to:

Holly Perry
Governance Manager
General Optical Council
41 Harley Street
London
W1G 8DJ

You may also email responses to hperry@optical.org or send a fax to +44(0)207 436 3525. We do not usually accept responses by telephone or in person. We normally ask that consultation responses are made in writing to ensure that we can accurately record what the respondent would like to say. However, if you are unable to provide

your response in writing please contact us on +44(0)207 307 9483 to discuss any reasonable adjustments that would help you to respond.

Please include your contact details so that we can follow up any relevant aspect of your response. Unless you state otherwise (and an automatic disclaimer generated by your IT system will not be taken as such) we will assume that you are happy for us to publish your response, including your name, and to share it with other appropriate bodies and stakeholders.

Further information

Where possible, please provide evidence to support your response. If you are a representative group, it would be helpful if you could include a summary of the people and organisations that you represent.

A copy of this consultation has been sent to a large number of stakeholder groups representing our registrants, the public, patients, partner organisations and other groups.

If you have any queries about the consultation then please contact Holly Perry on hperry@optical.org or +44(0)207 307 9483

Our commitment to consultation

We believe it is important that people affected by our work have a say in how we deliver it. We believe it is vital to consult with all the groups with an interest in the GOC: patients, the public, our registrants, optical organisations, health care organisations, employers, other regulators, staff and other stakeholders.

How we consult with our stakeholders is set out in our *Consultation Framework*, available in the consultation section of our website. Feedback on the consultation process itself would be welcome. If you have any comments then please contact our Communications Manager, Simon Grier on sgrier@optical.org

Response cover sheet

Please send your responses to Holly Perry no later than **19 May 2014**.

Please include a copy of this cover sheet with your consultation response.

Responses should be sent to:

Holly Perry

General Optical Council

41 Harley Street

London

W1G 8DJ

Email: hperry@optical.org

Your details

Name:

Address:

Telephone number:

Email:

Are you replying on behalf of an organisation?

Name of the organisation:

Your position:

Nature of the organisation's work:

Keeping in touch

We would like to establish a network of stakeholders who are interested in our work on equality, diversity and inclusion and would like to contact you occasionally in relation to our work on EDI. We will not pass your data on to any third party. Please tick here if you wish to be contacted in this way about our work on EDI:

Because we value your input, we would like to contact you occasionally to let you know when we launch consultations and to invite you to future events. We will not pass your data on to any third party. Please tick here if you wish to be contacted in this way about the GOC's consultations:

Please include your contact details so that we can follow up any relevant aspect of your response. Unless you state otherwise (and an automatic disclaimer generated by your IT system will not be taken as such) we will assume you are happy for us to publish your response, including your name, and to share it with other appropriate bodies and stakeholders. Please tick here if you are only happy for us to share your response anonymously:

Consultation questions

We are seeking stakeholders' views on the questions below:

Question 1: Do you have any comments on our Equality, Diversity and Inclusion Scheme?

Question 2: Is there anything else we should consider including in our Scheme? Particularly if you have any suggestions for how it could be improved.

Question 3: What can we do to improve our monitoring data response rates and ensure that the data we collect is comprehensive and accurate?

Question 4: Which of the nine protected characteristics should we be gathering monitoring data for registrants, Council and Committee members and staff? Please explain why, particularly if you think we should gather different data for different groups.

Foreword

The General Optical Council (GOC) is the statutory regulator for the optical professions in the UK and we are constituted as a body corporate under the Opticians Act 1989, as updated by its section 60 Order which came into effect on 30 June 2005. As of 12 December 2012, the GOC was registered as a charity by the Charity Commission in England and Wales (registered charity number 1150137).

We have developed this draft Scheme with the desire to embed and promote equality, diversity and inclusion within our organisation in line with our EDI commitments. Our draft EDI Scheme demonstrates our commitment to developing our capabilities in this area so we are able to meet our legal responsibilities as a public body under the Equality Act 2010 to:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between people from different groups;
- foster good relations between people from different groups
- promote positive attitudes towards people with disabilities;
- encourage the participation of people with disabilities in public life; and
- take account of a person's disabilities even if this means treating the person with disabilities more favourably.

We have a duty to involve people with a disability in the development of our Scheme, however our aim is to effectively involve all the protected equality groups, as well as marginalised people in the development of our EDI plans.

We encourage you to take a look at the draft Scheme and let us know if you think we've got it right. It could be that you agree or disagree with elements of the Scheme, or it may be that you think there are better ways of achieving our aims and priorities.

Whatever your thoughts, we would very much like to hear them.



Samantha Peters
Chief Executive and Registrar

About us

We are one of 12 organisations in the UK known as health and social care regulators. These organisations oversee the health and social care professions by regulating individual professionals.

We are the regulator for the optical professions in the UK. We currently register around 26,000 optometrists, dispensing opticians, student opticians and optical businesses. Our purpose is to protect the public by promoting high standard of education, performance and conduct amongst opticians.

Our primary legislation is the Opticians Act 1989 (as amended) and we also have a series of related rules that describe how we carry out our statutory functions. Our legislation can be found on our website at:

http://www.optical.org/en/about_us/legislation/index.cfm

We set standards for optical education and training, performance and conduct, approve qualifications leading to registration, maintain a register of individuals who are qualified and fit to practise, train or carry on business as optometrists and dispensing opticians, and investigate and acts where a registrants' fitness to practise, train or carry on business may be impaired.

Our Mission

In line with our statutory function, our mission is to protect and promote the health and safety of members of the public. Our Equality, Diversity and Inclusion Scheme is designed to be integral to our mission and values.

Our Values

We are responsible, forward thinking and principled:

Responsible

We inspire confidence because:

- We make clear, well-reasoned, evidenced based decisions.
- We account for our actions and are open to scrutiny.
- We apply our resources in a targeted and proportionate manner.

Forward thinking

We make a difference because:

- We pursue defined goals and measure our results.
- We are progressive, innovative and agile in our ways of working.
- We achieve and deliver more by working collaboratively.
- We are a learning organisation committed to continuous improvement.

Principled

We build trust because:

- We gain respect through our credibility, integrity and high standards.
- We listen openly, act responsively and communicate honestly.
- We behave consistently and fairly to everyone.
- We foster a positive and productive culture.

Characteristics of the professions

We want to know more about the diversity of the professions we regulate. Currently, there are 13,870 optometrists, 6,201 dispensing opticians, 2,875 student optometrists and 1,306 student dispensing opticians on the GOC Register (as at 31 December 2013). An analysis indicates that the majority of individuals in each profession are women. For optometrists, the figure is 56% female; and for dispensing opticians the figure is even higher, at 60% female. This is a trend that has been more or less continual since the 1970s. 2003 was the first year that there were more female dispensing optician than male, and 2005 was the first year that there were more female opticians. This trend looks set to continue as 67% of student optometrists are female; and 68.5% of student dispensing opticians are female. We are also starting to see a younger age profile emerging: the majority of optometrists as at December 2013 were aged under 40 (56%), while for dispensing opticians, the figure was 46% (as at 31 December 2006, over half of all registrants were over 40 years of age).

We published an equality and diversity monitoring report about the professions in 2009. This is available on our website¹. In December 2008, equality and diversity monitoring forms were included in the retention packs sent out to all fully-qualified optometrists and dispensing opticians (forms were not sent to registered bodies corporate). Monitoring forms were also included with the retention packs sent to all registered student optometrists and student dispensing opticians in April 2009. The response rate was 68% of all registrants. The information requested in the forms covered the protected characteristics of gender, age, ethnic origin and disability and was collected in a non-attributable format.

The next round of data collection took place in 2013 when equality and diversity monitoring questions were included in the GOC stakeholder survey that was sent out to all individual registrants. The information requested in the survey covered the protected characteristics of gender, age, ethnic origin, disabilities, sexual orientation and religion or belief. We received survey responses from 10% of all registrants (a total of 1,353 responses). The analysis is broadly in line with the trends reported in the 2009/10 report and an analysis will be published alongside this Scheme in July 2014.

¹ http://www.optical.org/en/news_publications/Publications/equality-and-diversity-reports.cfm

Our commitment to equality, diversity and inclusion

We are committed to:

- promoting equality;
- valuing diversity;
- being inclusive; and
- meeting our equality duties.

Promoting equality

We are committed to treating members of the public, registrants, current and prospective Council and committee members and staff solely on the basis of merit. As the regulator for the optical professions in the UK, we have a critical role to play in ensuring that in exercising all of our functions, we operate in a fair and transparent manner and free from discrimination, harassment and victimisation.

Valuing diversity

We value and respect diversity and strive to take account of and reflect the interests of our internal and external stakeholders in all of our activities to eliminate any adverse impact of our activities on particular groups. We value the differences which exist between people and embrace these differences to promote an environment where everyone's characteristics are valued, respected and utilised.

Being inclusive

In all our work as a regulator, public service provider and employer, we aim to ensure the full and fair participation of marginalised or under-represented groups. We are committed to consulting with everyone affected by this Scheme and Plan, including our staff, Council and committee members, registrants and the public.

Equality duties

Some of our specific duties appear contradictory to our commitment to promoting equality, valuing diversity and being inclusive. This is because in some instances, we will take positive action to advantage some disadvantaged groups. This is to ensure that we meet our equality duties and we will always be open and transparent in our justification when taking such action.

Progress

Since the publication of our first scheme and action plan in 2007, we have made progress in achieving these commitments – our progress to date is set out on pages 15 to 17 of this Scheme.

Through embedding equality, diversity and inclusion in all that we do, we believe we will improve both our effectiveness and efficiency as a regulator.

Our equality, diversity and inclusion objectives

We have developed the following seven EDI objectives in order that we are able to fulfil our commitments to equality, diversity and inclusion. This is an ongoing programme of work which is embedded into our business planning processes. The activities we have undertaken since 2009/10 (set out on pages 16 to 18) illustrate that we are already on the way to achieving our commitments to equality, diversity and inclusion.

Objective 1 - Policies and procedures

To ensure that our policies and procedures are fair, transparent and applied consistently.

We will ensure that there is fairness and equality of opportunity to all individuals regardless of protected characteristic and all our policies and procedures meet our statutory duties and commitments in respect of EDI.

Objective 2 - Guidance and training

To provide relevant and practical guidance and training on equality, diversity and inclusion.

We will ensure that everyone who works for us – either as a member of staff or in a non-executive or other capacity – is aware of our equality duties and takes them into account. This includes third parties exercising public functions on our behalf, for example, our consumer complaints service.

Objective 3 - Monitoring and impact

To monitor diversity and effectively assess the impact of our activities.

We will collect sufficient information to be able to understand the characteristics of those who work for us and the diversity of the optical professions, including information collected by third parties exercising public functions on our behalf. We will use this information to assess the actual and potential differential impact of our policies and procedures (including in their implementation) on people, and identify how any impacts can be mitigated. Where relevant, we will monitor the implementation of the EDI policies or statements of third parties with whom we engage (for example, accredited training providers).

Objective 4 - Access

To provide services and deliver our statutory functions in a way that is accessible and appropriate.

We will ensure fair access to everyone. In particular, we will take account of a person's disabilities including treating people with a disability more favourably where justified.

Objective 5 - Communication and engagement

To undertake communication and engagement with stakeholders in our approach to EDI and promotion of equality, diversity and inclusion.

We will involve stakeholders in the development of our Scheme, policies and procedures and refine them where appropriate. We will be transparent in communicating our EDI arrangements and our progress towards achieving our EDI objectives. We will seek opportunities to share and understand EDI best practice, to foster good relations between people from different groups and promote positive attitudes towards people with disabilities.

Objective 6 – Service delivery

To ensure our approach to regulation improves the effectiveness of EDI policies on service delivery.

Through our education and standards work we will ensure that there is an appropriate emphasis on EDI for those entering and working in the professions and in registered businesses. We will support and encourage registrants to deliver services which fulfil their EDI obligations and meet the needs of all parts of the community, including the provision of equal access to eye care for everyone and taking account of a person's disabilities. Through our quality assurance of training providers we will seek to ensure access to optometry and dispensing optics training in the UK is fair, transparent and free from discrimination and that people from all protected characteristic groups are encouraged to participate in the profession.

Objective 7 - Action planning

To develop action plans to support the implementation and monitoring of our Scheme.

We will embed EDI action planning across the organisation within the strategic and business planning process.

Our equality duties

The Equality Act 2010 applies to all organisations that provide a service, sell goods or provide facilities to the public or a section of the public. The Act brought together over 116 separate pieces of legislation into one single Act. The Act protects people from discrimination (both direct and indirect) on the basis of nine protected characteristics (see below). The Act also provides for positive action to advantage some disadvantaged groups.

Under the Equality Act 2010 we have statutory duties, as an organisation providing a public service, covering all protected characteristics:

- age
- disability
- gender reassignment
- race
- religion or belief
- sex
- sexual orientation
- marriage and civil partnership
- pregnancy and maternity.

The Act includes a public sector equality duty that applies to public bodies and others carrying out public functions, and places a duty on us to ensure equality in the exercising of our public functions. As a public authority we must have due regard to the need to:

- a. eliminate discrimination, harassment and victimisation;
- b. advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
- c. foster good relations between people who share a protected characteristic and those who do not;
- d. promote positive attitudes towards people with disabilities;
- e. encourage the participation of people with disabilities in public life; and
- f. take account of a person's disabilities even if this means treating the person with disabilities more favourably.

We interpret that 'advancing equality of opportunity' as meaning:

- removing or minimising disadvantages suffered by people due to their protected characteristics;
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

We interpret ‘fostering good relations between different groups’ as tackling prejudice and promoting understanding between people who share a protected characteristic and those that do not.

The Equality Act contains a duty to provide reasonable adjustments. We are committed to taking reasonable steps to:

- avoid substantial disadvantage where a provision, criterion or practice puts people with a disability at a substantial disadvantage;
- avoid substantial disadvantage, where a physical feature puts persons with disabilities at a substantial disadvantage; this includes removing the physical feature in question, altering it or providing a reasonable means of avoiding it; and
- provide an auxiliary aid where, without one, a person with disabilities would be put at a substantial disadvantage.

In order to comply with the general equality duty, we will ensure that:

- those who exercise our functions (including our staff, Council, Investigation Committee, Fitness to Practise Committee and Education Committee – and also our advisory committees, including our Registration Committee, Standards Committee and Companies Committee) are aware of the duty’s requirements and are fully aware of the implications of the duty when making decisions about our policies and practices; and
- any third parties exercising public functions on our behalf are required to comply with the duty, and that they do so in practice. This is because the duty rests with us as the public authority even if we have delegated any functions to a third party.

Other relevant legislation/oversight

We are required by section 32A(1) of the Opticians Act to include information in our Annual Report regarding the arrangements our Council has put in place to ensure that we adhere to good practice regarding equality and diversity. The Annual Report is submitted to the Charities Commission and Privy Council, and laid before Parliament. The Professional Standards Authority (the body responsible for overseeing the UK’s nine health and care professional regulatory bodies) also monitor regulators’ performance regarding equality and diversity.

Our earlier equality schemes and action plans

We first developed an Equality and Diversity Scheme and action plan for the period 2007 to 2009. The plan was revised and Council received reports on achievement against the action plan on a routine basis.

In 2009 we asked registrants to respond to a monitoring survey, the results of which were published in a report in 2010. Prior to the monitoring taking place, the draft monitoring form was issued for consultation (June 2008). The report surveyed registrants on gender, age, ethnic origin and disability status. The GOC received responses from 68% of full registrants and 26% of student registrants. The report can be found on our website here:

http://www.optical.org/en/news_publications/Publications/equality-and-diversity-reports.cfm

A revised scheme and action plan was developed for the period 2010 to 2012 and we continued to work to this scheme and plan during the course of 2013. This scheme was developed to respond to requirements under various pieces of UK law, including the Equality Act 2006, and various Employment Equality regulations. The 2010 Scheme can be found on our website here:

https://www.optical.org/en/about_us/equality-and-diversity.cfm

Progress in relation to equality and diversity issues

Since publication of our second scheme and action plan, we have progressed a number of strands of work in relation to equality and diversity issues, including the following:

1. Our staff undertook equality and diversity training in 2010, and members of our Fitness to Practise Committee undertook equality and diversity training in October 2012. We organised training for all Council members in November 2012 on equality and diversity, in particular the Equality Act 2010 and the public sector duties.
2. Our website now meets Web Content Accessibility Guidelines 2.0 (Level AA) accessibility standards and we make publications available in large text and languages other than English on request.
3. To help improve access to the profession, we have produced guidance for students with disabilities and other health conditions.
4. We require training providers that we accredit to have an equality and diversity statement, and also require them to ensure that their assessment processes treat everyone fairly.

5. Trainee optometrists and dispensing opticians are taught and assessed on a number of competencies relating to equality and diversity issues.
6. We conducted an equality impact assessment for the Continuing Education and Training project.
7. We revised our staff policies and procedures - as part of this process, we checked that all our HR policies and procedures reflect our statutory duties and equality and diversity commitments.
8. In summer 2013 we developed and provided guidance to Council and selection panels undertaking the appointment of Council and committee members. The guidance can be found here: http://www.optical.org/en/about_us/our-governance/index.cfm
9. We developed a diversity monitoring form to ensure that information could be collected from various groups in order to monitor efforts to ensure diversity - the forms covered seven of the protected characteristics: age; disability; race; religion or belief; gender; sexual orientation; marriage and civil partnership. We currently do not collect data on pregnancy and maternity leave, or gender recognition. This is because, in line with our information governance duties, our approach is to collect only the data we need and will actively use to monitor the effects of our policies and procedures. We also believe that collecting data on all nine protected characteristics might adversely impact on response rates. We used the form:
 - during the recruitment process for new Council and committee members;
 - to capture data on current Council and committee members;
 - to capture data on staff; and
 - during the recruitment process for staff.
10. We also used the diversity monitoring form to survey registrants as part of a stakeholder survey completed in January 2013. 10% of all registrants (1,353 responses) responded to the survey and the results, summarised on page 9, will be published alongside this Scheme in July 2014.
11. We have continued to operate in accordance with the commitments set out in our Welsh Language Scheme – we have adopted the principle that in conducting our public business in Wales, we will treat the Welsh and English languages on the basis of equality. Our Welsh Language Scheme identifies how we administer this principle when providing services in Wales.
12. We developed guidance on reasonable adjustments covering the recruitment of Council, committee members and staff - and monitor the requests we receive.

13. In October 2013 our Remuneration Committee took EDI considerations into account in revising our expenses policy. The policy now refers to areas where the GOC had a responsibility with regards to equality and diversity, such as costs relating to childcare, carers and dependents and any costs associated with making 'reasonable adjustments' (such as braille/audio recording, taxis for those with mobility difficulties, costs associated with support workers). It is now clear to users of the policy what they can and cannot claim for and where 'prior or case by case approval' is required.
14. In the retender for our consumer complaints service (January 2014) we reviewed whether the third parties bidding to exercise this part of our public function on our behalf were aware of our equality duties and took them into account.

Our Equality, Diversity and Inclusion Scheme 2014 - 17

How we have developed the Scheme

We have updated our Scheme to take account of current legislation and the public sector equality duty. Our Scheme is a firm statement of our intent in meeting our equality, diversity and inclusion objectives in delivery of our strategic and business plans, and in our role as regulator, public service provider and employer.

Equality, diversity and inclusion champions

We are committed to ensuring that equality, diversity and inclusion is led from the very top of the organisation and have therefore identified equality, diversity and inclusion champions to help us progress the EDI work within the GOC. The Chair of the General Optical Council, Gareth Hadley and Council member Liam Kite are our non-executive champions, and Josephine Lloyd, Director of Resources, is championing our work on behalf of the Executive. Our champions will be taking an active part in ensuring the scheme and accompanying action plans are developed in line with our duties and capabilities and are implemented effectively.

Activities for 2014 to 2017

We set out on page 11 to 12 our high level and long term objectives for EDI which we hope will help us achieve our commitment to EDI. Our main focus throughout this Scheme will be on activities to enable us to meet our legal obligations under the Equality Act 2010 and public sector equality duty and develop our processes in this area. We will focus on areas of highest priority in meeting our EDI objectives, in a way which is proportionate to available resources and in line with the work programmes and projects included in our business plan. If necessary, these activities will be ongoing until we are confident that our processes are developed sufficiently and our approach to EDI is embedded in our business planning activities.

We will develop an EDI action plan for 2014-2017 following the consultation, to enable us to monitor and report on our progress. It is likely that this action plan will include some of the following activities identified against each of our seven objectives, which are linked to the work programmes and projects in our business plan. The action plan will be informed by the feedback we receive in the consultation and will focus on activities identified as the highest priority.

Objective 1 – Our policies and procedures

- 1.1 assess the implications of the EHRC Inquiry into Disability Related Harassment² to determine whether we need to take action to prevent and deal with disability related harassment; and

² <http://www.equalityhumanrights.com/legal-and-policy/inquiries-and-assessments/inquiry-into-disability-related-harassment/>

- 1.2 establish a schedule for prioritised review of our policies and procedures to ensure they reflect our statutory duties and commitments in respect of EDI.

Objective 2 – Our guidance and training

- 2.1 provide relevant guidance to all staff on our EDI duties, scheme and action plan and how to put EDI into practice;
- 2.2 deliver training to relevant staff on how to assess the impact of our activities;
- 2.3 deliver training to management staff to ensure that they are able to meet their EDI duties;
- 2.4 provide guidance to Council and committee members and other non-executives on our EDI scheme and action plan to ensure all who make decisions are fully aware of the implications of our duties in making decisions;
- 2.5 establish a programme of refresher training to ensure staff and members of our Council and our decision-making committees keep up to date with the latest EDI developments; and
- 2.6 review, and if appropriate, update our provision of guidance to third parties exercising public functions on our behalf to ensure they are complying with our duties in practice.

Objective 3 – Monitoring and impact

- 3.1 identify the information we need to gather through monitoring and establish EDI benchmark data for monitoring and reporting on EDI issues relating to our registrants through our customer relationship management system project;
- 3.2 identify and begin to gather the information we need to help us understand the EDI landscape in the optical market;
- 3.3 analyse EDI information as part of our horizon scanning, performance reporting, accreditation and quality assurance, CET, FTP complaints and illegal practice complaints work programmes;
- 3.4 ensure our equality impact assessment procedures are fit for purpose;
- 3.5 consider whether there are any EDI implications of our work programmes on legislative change, corporate complaints, governance framework, non-executive support, registration guidance, FTP process improvement, training and development and performance and reward;
- 3.6 consider whether there are any EDI implications of our projects on business regulation, student regulation, illegal practice strategy, standards review and property relocation; and
- 3.7 review the monitoring systems of third parties exercising public functions on our behalf to ensure they are appropriate and provide us with relevant monitoring information.

Objective 4 - Access

- 4.1 through our communication channels work programme ensure that any website changes that take place in 2014/15 are accessible and meet best practice requirements;

- 4.2 through our public register work programme ensure our register is accessible;
and
- 4.3 through our meetings management work programme ensure our meetings are accessible.

Objective 5 - Communication and engagement

- 5.1 through our accountability work programme communicate our arrangements to ensure good practice in EDI and progress towards achieving our EDI objectives in our annual report;
- 5.2 consult staff on the implementation of our EDI Scheme for 2014-17 to ensure that staff are involved in decisions which impact on them;
- 5.3 engage external stakeholders in relation to our EDI work; and
- 5.4 through our research, stakeholder engagement and effective communication work programmes engage with a diverse range of stakeholders.

Objective 6 – Service delivery

- 6.1 satisfy ourselves that there is appropriate emphasis on EDI in our work programmes on Education accreditation and quality assurance and CET;
- 6.2 through our standards review project ensure registrants are clear about their EDI obligations and how to adhere to them; and
- 6.3 through our Education accreditation and quality assurance work programme ensure those providing optometry and dispensing optics training in the UK operate processes that are fair, transparent and free from discrimination.

Objective 7 - Action planning

- 7.1 embed EDI action planning activity into strategic and business planning processes;
- 7.2 identify actions required to address or mitigate any adverse impacts revealed by monitoring activity; and
- 7.3 develop future action plans to respond to the outputs of monitoring activity and impact assessments and our understanding of the issues that are of most relevance to our staff, Council and committees, and wider stakeholders including professional bodies, partner organisations, patient representative groups and members of the general public.

In addition, we will ensure that breaches of our EDI objectives are dealt with in line with the relevant GOC procedure.

Engagement and involvement

To ensure that the scheme evolves to meet the needs of our stakeholders, we are committed to working in conjunction with them. We plan to increase our engagement with stakeholders and representative groups as resources allow and we are committed to being inclusive, particularly with those perceived as hard to reach groups. Our communications team will continue to ensure that our consultation

activities include stakeholders from diverse communities. We will also pay particular attention to identifying and engaging with groups and individuals who are under-represented in the health care agenda.

In building data collection for registrants into online retention, it will be particularly important for us to articulate clearly to registrants the reasons why data collection is so vital, and to provide some accompanying FAQs to assist them. This should help ensure we receive the highest possible response rate.

We are members of a healthcare regulators' Equality and Diversity Forum, with which we will continue to engage, and also the Equality and Human Rights Commission's Regulators, Inspectorates and Ombudsman forum.

We will also engage with staff to support them in understanding their role in developing and delivering actions, embedding them into business planning and in ensuring appropriate reporting.

Resourcing and oversight

Responsibility for coordinating our equality, diversity and inclusion work rests with our governance team, with ongoing and regular reporting to Council.

Annex 1 - Our approach to fulfilling our duties under the Act

We are committed to meeting our statutory requirements outlined in our Equality, Diversity and Inclusion Scheme and applying the same principles to our policies on all protected characteristics. The statements described below outline what we are required to do under the Equality Act 2010 and the public sector equality duty, and the steps we are taking in order to ensure that we do not discriminate against people unlawfully. The statements are broken down by protected characteristic, and many of the steps we are taking to avoid or mitigate any adverse impact are relevant to some or all of these groups.

	Race	Gender	Sexual orientation	Gender reassignment	Disability	Religion or belief	Age	Marriage or civil partnership	Pregnancy or maternity
Objective 1 - Policies and procedures									
Ensure that employment policies apply equally to all staff – including pay and reward systems – and any issues are resolved speedily and effectively.	X	X	X	X	X	X	X	X	X
Ensure that all other policies are non-discriminatory and do not make unnecessary assumptions.	X	X	X	X	X	X	X	X	X
Welcome and encourage job applications from people from the broadest range of backgrounds.	X	X	X	X	X	X	X	X	X
Confront unacceptable attitude, behaviour and language; encourage understanding of individual attributes and rights.	X	X	X	X	X	X	X	X	X
Ensure that any allegations of discrimination or harassment are investigated thoroughly, speedily and sensitively in line with our policy.	X	X	X	X	X	X	X	X	X

	Race	Gender	Sexual orientation	Gender reassignment	Disability	Religion or belief	Age	Marriage or civil partnership	Pregnancy or maternity
Objective 2 - Guidance and training									
Provide Council members, our staff and those carrying out work and making decisions on our behalf with guidance on equality and training on how to put it into practice in performing their roles	X	X	X	X	X	X	X	X	X
Objective 3 – Monitoring and impact									
Seek to identify and meet the needs of different groups by assessing our functions and policies and considering whether they have implications for equality or the potential to affect different groups adversely.	X	X	X	X	X	X	X	X	X
Monitor our staff, Council and committee members, as well as registrants so as to identify and address any adverse impact of our policies on the promotion of equality amongst different groups.	X	X	X	X	X	X	X	X	X
Maintain systems to allow us to monitor the effects of our policies and any changes made to them, on different groups.	X	X	X	X	X	X	X	X	X

	Race	Gender	Sexual orientation	Gender reassignment	Disability	Religion or belief	Age	Marriage or civil partnership	Pregnancy or maternity
Objective 4 – Access									
Seek to ensure that our policies are non-discriminatory and do not make unnecessary assumptions about people based on any protected characteristic.	X	X	X	X	X	X	X	X	X
Work with representatives of different minority groups to improve access to optical services.	X	X	X	X	X	X	X	X	X
Promote access to information and services, where appropriate, through the use of translation and interpretation services.	X								
Promote access to information in alternative formats and ensure that GOC events are held in premises with appropriate facilities for people with disabilities.					X				
Aim to retain employees who experience disability by making reasonable changes to their duties or working environment.					X				
Where reasonably practicable, ensure that meetings, hearings and events do not coincide with cultural or religious festivals or holidays where this would prevent people from attending.						X			

	Race	Gender	Sexual orientation	Gender reassignment	Disability	Religion or belief	Age	Marriage or civil partnership	Pregnancy or maternity
Ensure that leave is not withheld unreasonably from employees who wish to celebrate cultural or religious festivals or holidays.						X			
Not impose dress restrictions on employees which may be discriminatory unless such restrictions can be justified objectively in terms of meeting a legitimate health, safety or business need.						X			
Seek to ensure that food provided at meetings and events will meet the needs of those attending.						X			
Where reasonably practicable, ensure that the needs of those who require a place for prayer are appropriately met.						X			
Objective 5 - Communication and engagement									
Work with representatives of different groups to help ensure that our policies meet their needs.	X	X	X	X	X	X	X	X	X
Objective 6 - Action planning									
Take timely and appropriate action as necessary where the results of monitoring indicate that there are implications for equality or the potential to affect different groups adversely.	X	X	X	X	X	X	X	X	X

Annex 2 - The GOC's governance framework

Our Council

Our Council comprises 12 members (who, as of 12 December 2012, also became charitable trustees when the GOC achieved charitable status) of which six are registrants and six are lay members. Lay people bring in knowledge from outside the profession and help to ensure public focus, openness and transparency. Of our 12 members eight are men and four are women; two are based in Wales, two in Scotland, one in Northern Ireland and seven in England.

To reinforce independence, and to ensure transparency in decision-making, our Council is appointed rather than elected. Members are appointed by the Privy Council to ensure a balance of qualities, skills and experience, and to reflect the diversity of the public and of the optical profession. In the appointment of Council we aim to ensure that members have a variety of backgrounds, skills and experience in order that Council can be as diverse as possible. All of the Council members share the same duty of public protection and oversee the full range of regulatory processes.

Council (in their role as members and trustees) have a duty to act impartially and objectively, and take steps to avoid any conflict of interest arising as a result of their membership of, or association with, other organisations or individuals. As trustees, members have a duty to avoid putting themselves in a position where their personal interests conflict with their duty to act in the interests of the charity, unless they are authorised to do so. To make this fully transparent, we have established a register of members' interests, which is published on our website.

Our Committees

In order to exercise its powers under the Opticians Act 1989, Council delegates certain responsibilities to Committees with clearly defined authority and terms of reference. Council has the following three non-statutory advisory committees:

- Audit and Risk Committee
- Remuneration Committee
- Nominations Committee

The Opticians Act 1989 specifies that we constitute seven statutory committees to support us in our work as follows:

- Education Committee
- Standards Committee
- Companies Committee
- Registration Committee
- Investigation Committee
- Fitness to Practise Committee and Registration Appeals Committee

Our Staff

The GOC is structured into three interlinked directorates:

- Regulation
- Policy, Communications and Governance
- Resources