

## **General Optical Council Equality, Diversity and Inclusion Scheme 2014-17 – A draft for consultation – Optical Confederation response**

**Q1: Do you have any general comments on our Equality, Diversity and Inclusion Scheme?**

A1: We are pleased to see the General Optical Council's (GOC) commitment to Equality, Diversity and Inclusion (EDI).

From our point of view we can separate the GOC's commitment into two areas:

- the way in which the GOC acts internally towards its own staff and stakeholders;
- the position which the GOC takes towards its registrants' and their EDI obligations. We would be unhappy to see any burdens over and above those already existing in law imposed on registrants.

**Q2: Is there anything else we should consider in our scheme? We would particularly welcome any suggestions of how it could be improved.**

A2. We are concerned that disabilities are particularly highlighted (possibly because of the explicit statutory duty to make reasonable adjustments); however all persons with protected characteristics (and indeed those without) should be treated on exactly the same basis.

It still reads as though EDI is something "done to" others by the GOC, rather than that equality for all is enshrined in everything the GOC does. Some drafting suggestions on the policy scheme to this effect are attached.

**Q3: What can we do to improve our monitoring data rates? And ensure that the data we collect are comprehensive and accurate?**

A4: Data that would be useful would include data on

- the gender split of the profession
- the ethnic mix of the profession
- the age profile of the profession
- the number of professionals with protected characteristics
- the number of professionals who work part-time

It would be useful to track changes in these statistics over time. Understanding these changes will enable us better to predict the workforce needs in the future. For example, we note that the age profile of the profession is getting younger; it would be useful to see what the reasons are for this change? Are optometrists and dispensing opticians leaving the profession at a certain stage of their career? Do the ones who are leaving share any characteristics that would help us to predict behaviour? With the general population getting older and therefore more likely to have eye care needs, it is important that we have enough information to ensure that our workforce is able to deliver the care required without impinging on their EDI rights.

Does the GOC have any benchmarks of the proportion of registrants we would expect to have “protected characteristics” and whether 10% (as in the response rate) is good – especially with a demographic that is under 40 – or whether 10% is about what we would expect or too low?

If the latter, it might be sensible to include a box to tick recording that the registrant does not have any protective characteristics. This would at least require an active as opposed to a passive response.

**Q4: For each group we collect data on, which of the protected characteristics should we gather monitoring data for? Please explain why, particularly if you think we should gather different data for different groups.**

A4: The usefulness of some data is not immediately apparent. However, once collected, data can bring unexpected issues to light. We feel that the same data should be collected from all groups

#### **About us:**

The Optical Confederation represents the 12,000 optometrists, 6,000 dispensing opticians, 7,000 optical businesses and 45,000 ancillary staff in the UK, who provide high quality and accessible eye care services to the whole population. The Confederation is a coalition of five optical representative bodies: the Association of British Dispensing Opticians (ABDO), the Association of Contact Lens Manufacturers (ACLM), the Association of Optometrists (AOP), the Federation of Manufacturing Opticians (FMO) and the Federation of (Ophthalmic and Dispensing) Opticians (FODO). As a Confederation we work with others to improve eye health for the public good.

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