

EQUALITY, DIVERSITY, AND INCLUSION

ANNUAL REPORT FOR THE YEAR ENDING 31 MARCH 2025



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Welcome

An introduction from the Chief Executive and Registrar

Our Equality, Diversity and Inclusion (EDI) Annual Report for 2024-25 reflects a year of meaningful progress at the General Optical Council (GOC), where we built on our commitment to foster an environment where fairness, inclusivity, and equality are not just principles we champion, but values that shape every aspect of our work.

Equality, diversity and inclusion is central to how we regulate, how we engage with stakeholders and all those who use our services, as well as our actions as a responsible employer.

Last year, we launched our 2025–2030 EDI

Strategy, which is now in its delivery phase. The strategy is built around four objectives that support our statutory role as both a regulator and an employer — to oversee and support the 35,164 dispensing opticians, optometrists, optical students and optical businesses on our register, and to ensure our employees, workers, and members experience a fair and inclusive working environment. Each objective is supported by seven actions and clear measures to track progress and hold us to account. Our strategy is not just a roadmap; it's a commitment to meaningful change, rooted in the everyday

WE REMAIN
COMMITTED TO
STAYING CURIOUS,
CONNECTED, AND
OPEN TO
LEARNING

experiences of the people we regulate, employ, and serve.

This report describes our achievements over the last twelve months - for the public, for our registrants, and for GOC staff – as well as the progress made against our EDI action plan 2024-2025 and our EDI monitoring data for registrants, employees, members, and workers.

In 2024-25 we begun the process of enhancing the quality and scope of our EDI data. This has enabled us to make more informed comparisons, identify disparities, and begin to address systemic challenges. This includes better intersectional analysis and improved internal data literacy. Transparency and trust are at the heart of this work, and we've taken steps to communicate why this data matters and how it underpins impactful change.

Although we are not legally required to publish gender pay gap data due to our size, we have chosen to continue to report on this annually as a matter of principle, because transparency drives progress.

We have also invested in our people. EDI training is a standard part of induction, development, and management training, with a particular focus this year on structural discrimination, reasonable adjustments, and sexual harassment awareness. Our staff networks have continued to grow, supported by clearer governance frameworks and a monthly "Empower Hour" a protected hour set aside each month during their working time for

colleagues to focus on this vital work. These initiatives reflect our commitment to not only meet but exceed our regulatory obligations by embedding inclusive practice in our work.

I want to acknowledge the creativity and leadership shown by our staff networks this year. They reflect what inclusive culture looks like in practice, promoting connection and wellbeing while providing insight about peoples lived experiences. We know that effective leadership means creating a workplace where people feel safe, respected, and empowered to speak up. Through the development of our Speaking Up Guardian role, and updated policies that reflect new legislation such as the Worker Protection Act, 2023 we have made meaningful strides in cultivating a culture of confidence and accountability.

Last year we introduced a new internship with the Thomas Pocklington Trust, a charity that supports blind and partially sighted people to access work opportunities and are proud to have since welcomed two interns at GOC who have successfully graduated from their "Get Set Progress" programme. It is a relationship we value, and one we intend to continue and build on in the years ahead.

We are building stronger links across the regulatory and healthcare sectors to align with best practice, learn from external reviews, and share insights where possible; because we know that collaboration is key to sustained progress in EDI.

I want to thank our staff, partners, and stakeholders for their dedication to this shared commitment. The work is ongoing, and it will not always be easy, but our direction is clear: we are building a GOC that is fairer, more inclusive, and better equipped to serve the public and the profession. As we move forward, we remain committed not only to delivering on our objectives, but to staying curious, connected, and open to learning.



Leonie Milliner
Chief Executive and Registrar



Our year at a glance



1

Completed 21 out of 25 of our Equality, Diversity and Inclusion projects

2

Achieved Disability Confident Level 2 for people with disabilities at the GOC

3

Introduced a values-led management style to support our employees

4

100% attendance at structural discrimination training sessions

5

Achieved the Bronze TIDemark award from Employers Network



Serving the public

As the regulator, our statutory role is to protect the public and uphold public confidence in the professionals and businesses we regulate. Our vision is safe and effective eye care for all. To that end, as well as ensuring our standards of practice for registrants are fit for purpose and meeting the expectations of our oversight regulator (the PSA's Standards of Good Regulation), a key focus of our work this year has been identifying and addressing barriers in accessing eye care services, particularly amongst groups with vulnerabilities.

Revised standards to better reflect developments in optical practise and public expectations

Following a period of extensive stakeholder

consultation and feedback, on 1 January 2025, we updated our Standards of Practice for Dispensing Opticians, Optometrists and, Standards for Optical Students, and Standards for Optical Businesses.

The changes made to the standards aim to improve clarity and alignment and ensure that the standards reflect emerging changes in the sector. Key changes that have been put in place address:

- Delivering better care for patients in vulnerable circumstances.
- Requiring registrants to identify themselves and their role and advise patients who will provide their care.
- Maintaining appropriate professional boundaries, including prohibiting conduct of a sexual nature with patients.

OUR VISION
IS SAFE AND
EFFECTIVE EYE
CARE FOR ALL



- Promoting better workplace cultures by explicitly referencing inclusive behaviour between colleagues and ensuring employers support staff who have experienced discrimination, bullying or harassment in the workplace.
- Keeping updated on developments in digital technologies and applying professional judgement when utilising the data they generate to inform decision making.
- Maintaining confidentiality when sharing patient images online.
- Demonstrating leadership in practice, for example by supporting the education and training of others.

Maintaining public confidence by meeting Professional Standards Authority (PSA) expectations on EDI

Each year, the Professional Standards Authority (PSA), our oversight regulator, reviews how

well we are meeting their Standards of Good Regulation. In their latest performance review (2023/24), published in March 2025, we met all 18/18 of the standards, and were proud to once again meet the EDI standard – recognising both our strategic approach and the practical steps we've taken to embed equality, diversity, and inclusion across our work.

"We consider that the GOC has met Standard 3. The GOC has continued to embed its EDI work across the organisation"
– PSA Performance Review 2023/24

The PSA has recently introduced new expectations under this standard. These include demonstrating how we are using EDI evidence to inform our regulatory functions, how we consider the lived experience of diverse communities in our decision-making, and how we work with others to address inequalities in the professions we regulate. We welcome these developments and see them as closely aligned with our own ambition to be a fair and inclusive regulator.

Over the coming year, we will continue to strengthen our use of EDI data and insight across all areas of our work, ensuring that our policies and practices reflect the needs and experiences of the employees, members and workers we serve and registrants we regulate.

Considering the experiences of diverse communities: Public perceptions survey and lived experience research

Our public perceptions survey and accompanying lived experience research offered valuable insights into the barriers some people face in accessing and using eye care services. While overall satisfaction rates remain high, the findings highlighted notable disparities for people with certain vulnerability markers, such as financial hardship, bereavement, caring responsibilities, or disability.

Key insights include:

- **Reduced access and satisfaction:** People with vulnerability markers were less likely

WE ARE
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AGAIN MEET
THE PSA'S EDI
STANDARD

WE HAVE
A STATUTORY
OBLIGATION TO
MEET THE WELSH
LANGUAGE
STANDARDS



to go for regular sight tests and reported lower satisfaction with the care they received.

- **Cost as a barrier:** Many respondents cited the cost of glasses, contact lenses, or sight tests as a deterrent. Concerns about price transparency and feeling pressured to buy specific products were also common — particularly among those with multiple vulnerability markers.
- **Low prioritisation of eye health:** Eye health was not always viewed as a priority, and participants were often unaware of the wider benefits of regular tests, such as the detection of other health conditions such as diabetes or high blood pressure.
- **Psychological barriers to care:** Factors such as seeing multiple healthcare professionals, long waits, and discomfort with trying on glasses in public contributed to feelings of exclusion or anxiety for some participants.

This vital evidence will shape how we engage with patients and the public and support the sector in removing barriers to access. They reinforce our commitment to addressing inequalities in access and experience, with a focus on fairness of outcomes, culturally safe care, and listening to lived experiences of patients.

Enhancing public access to our services: Welsh language inclusion

As a public body, we have a statutory obligation to meet the Welsh Language Standards (WLS) and have continued to embed Welsh language access as part of our organisational culture and maintain compliance with the standard.

The GOC website (including our consultation platform) remains available in Welsh, as does our automated phone system. So far this year, over 17 additional documents have been translated into Welsh, helping to ensure fairer access for Welsh-speaking registrants, patients, and members of the public.

All-staff training on the history and culture of the Welsh language, the WLS, and our responsibilities under the legislation continues to be delivered and remains a core part of the EDI induction process for new joiners. A key part of making this work successful is the active collaboration between our EDI Manager and the Welsh Language Standards Joint Regulators Forum. These monthly discussions enable us to test and confirm our understanding of different elements of the Standards, share learning across the sector, and take a consistent and confident approach to compliance.



Supporting our registrants

In supporting our registrants – the nearly 35,000 dispensing opticians, optometrists, optical students and optical businesses on our register – we aim to address inequity, promote diversity, and foster inclusion in all elements of our work.

Understanding our registrant workforce and identifying concerns: Registrant workforce perceptions survey

The 2025 survey provided valuable insight into both demographics of the optical workforce and their experiences at work. We heard from 3,798 registrants (12% response rate) who offered a deeper view of the professional landscape.

Key findings included:

- **Job satisfaction:** – 51% of respondents from a global majority background were satisfied in their roles compared to 61% White British/Irish respondents. Salary, work/life balance and an unsupportive employer feature more strongly as reasons for dissatisfaction among global majority respondents.
- **Workplace culture and discrimination:** 29% of respondents reported experiencing discrimination at work in the past year. Experiences of discrimination have been broadly consistent over the last three years. Ethnicity, gender, disability and age were the most cited reasons.

WE AIM
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INEQUITY, PROMOTE
DIVERSITY,
AND FOSTER
INCLUSION



- **Inclusion and progression:** GOC registrants are similar to NHS staff in terms of having opportunities to develop their careers, to improve their knowledge and skills, and to access the right learning and development, they are less likely to feel supported to develop their potential.

The survey findings will support our focus on ensuring fairer outcomes, increasing awareness of our regulatory role, and addressing disparities in workplace experience and progression across the optical sector.

Addressing unfairness in our Fitness to Practise process

This year we launched a working group to investigate potential causes of unfairness in our fitness to practise (FtP) process. The group began have reviewed the process to

identify areas for potential unfairness and have undertaken an analysis of our existing FtP EDI data to look for differential outcomes at each level. While some high-level trends were identified, it became evident that more detailed and intersectional analysis would be needed to fully understand how characteristics such as race, gender, disability, or socio-economic status may interact and shape experiences within the process. We recognise that individuals do not experience disadvantage in a single, uniform way and that understanding where outcomes differ is key to designing fairer systems. An external research provider has been contracted to undertake an in-depth analysis, with the expectation that the findings will be available by September 2025. This work supports our processes to deliver fair outcomes for our workforce, registrants, and the public; and reflects our commitment to evidence-based improvement.

INDIVIDUALS
DO NOT
EXPERIENCE
DISADVANTAGE
IN A UNIFORM
WAY



A positive culture for all GOC staff

We do our work as a regulator best when our own employees, members, and workers are reflective of the community we serve, and bring diversity of thought to our decision making. We continue to create a positive EDI culture, providing opportunities for learning and development around EDI, as well as promoting employee wellbeing and engagement.

Ensuring inclusive recruitment

In the last year, we have adapted our hiring process to ensure that it is fair and equitable. Where numbers allow, we have:

- Ensured the interview panel is diverse both in terms of gender and ethnicity

- Candidates meeting the minimum requirements for a role and declaring a disability on their job application are offered an interview
- Updated relevant job descriptions to confirm the GOC's commitment to inclusivity and making reasonable adjustments

We have successfully achieved Disability Confident Level 2 standard for our employee recruitment. For our member recruitment, we have removed desirable criteria from job adverts resulting in four times as many applicants on average and a notable increase in the number of Black and Muslim applicants. There were also almost twice as many Muslim

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ROADMAP

applicants to campaigns without desirable criteria (average of 10.3% candidates per campaign) compared to those with desirable criteria (average of 5.9% candidates per campaign). There was also more than twice as many applicants from the global majority – with an average of 15.9% of racially and ethnically minoritised group applicants on campaigns with desirable criteria and an average of 38.6% racially and ethnically minoritised group applicants for campaigns without desirable criteria.

Achieving the Bronze TIDemark award

We have achieved a Bronze TIDemark award from the Employers Network for Equality and Inclusion (ENEI). TIDE assessments allow us to benchmark our performance against other organisations and measure our progress in cultivating a positive and inclusive culture. Our overall score was 68%, placing the GOC in the second highest stage of the TIDE roadmap. The evaluation highlighted our strength in EDI strategy and planning, where we achieved a score of 95%.

Supporting blind and partially sighted professionals through meaningful internships

Our relationship with the Thomas Pocklington Trust (TPT) continues to grow through our participation in the Get Set Progress internship programme, which supports blind and partially sighted individuals into meaningful employment.

Joshua Feehan, Head of Internships, Thomas Pocklington Trust – “It has been fantastic to be partnering with GOC again this year. The GOC are supporting our goal of assisting more blind and partially sighted people into employment. GOC has offered a supportive environment for the intern they are hosting. The intern has demonstrated significant growth both personally and professionally because of the inclusive environment the GOC provides.”

Our most recent intern, Audrey, has been a valued part of the organisation, contributing across multiple teams, including Governance, Facilities and People and Culture. She has built connections across the GOC and played an active role in shaping how we work and learn as an inclusive employer.

Audrey Awosika, Thomas Pocklington Trust intern – “My internship at the General Optical Council was an incredible experience. I’m truly grateful for the opportunity and the team’s ongoing support. The inclusive and accessible environment—both physically and digitally—made me feel welcomed and empowered. Everyone was kind, understanding, and proactive in ensuring I had the tools, adjustments, and encouragement needed to thrive throughout my time there.”

The internship has brought valuable learning and is a programme that reflects our commitment to creating accessible and inclusive pathways into the sector. We’re looking forward to welcoming a new intern in the autumn and continuing to build our relationship with TPT.

Addressing the Gender Pay Gap

Our gender pay gap analysis for 2024–25, based on data captured on 31 March 2025, shows that female employees now earn more on average than their male colleagues at overall organisational level. Although the GOC is not legally required to publish gender pay gap data, we choose to share it each year as part of our commitment to transparency and fairness.

The gender pay gap looks at average pay across the whole organisation. It helps us understand the pattern of who sits where, rather than whether people doing the same job are paid equally. Because we’re a relatively small organisation, even small changes in our workforce profile can have a noticeable impact on these figures year on year.

This year, the gap is slightly in favour of women. This mainly reflects the shape of our workforce, including strong female

GENDER PAY GAP

	% difference in hourly rate (mean)	% difference in hourly rate (median)
GOC 2024-25	-0.42	-0.67
National average	13.8	13.1
Regulatory average	10.2	12.2
GOC 2023-24	-4.1	-2.6

averages. However, this year we have chosen not to include a regulatory sector comparison, as the external dataset available was not sufficiently robust to provide a reliable benchmark.

These results show that the actions we are taking to promote pay equity are making a measurable difference. We will continue to monitor our data each year and take action in ways that are inclusive and constructive, ensuring we maintain our positive progress towards lasting pay equity.

Engaging our staff in EDI learning and development.

Last year has seen a real focus on EDI learning and training. All employees and members have attended training on structural discrimination: what it is, what it looks like in the context of the workplace, and strategies for challenging its influence. We ensure all new members and employees have an EDI induction. We support all members involved in our Fitness to Practise (FTP) processes with regular briefings and training on EDI, including on how to recognise and challenge unconscious bias.

We have developed sexual harassment training to ensure all employees understand what constitutes this behaviour and empower them to act if they experience or witness sexual harassment. This is underpinned by the development of a new standalone Sexual Harassment policy and ensures our legal compliance following the introduction of the Worker Protection (Amendment of Equality Act 2010) Act 2023. We recognise that for some colleagues, this training may be difficult or triggering, so we are putting mechanisms in place to create a safe and supportive environment for everyone taking part. This reflects our commitment to treating all staff and registrants with dignity and respect

This year our EDI Manager also ran a training session on reasonable adjustments for managers, as part of a wider piece of work to build practical confidence in line management. The training not only supported managers in leading diverse teams more effectively but also helped ensure that colleagues who

GENDER PAY GRADES

	% difference in hourly rate (mean)	% difference in hourly rate (median)
Administrator	-1.84	-2.56
Officer	0.82	0.0
Manager	-0.83	-0.96
Head of	-1.31	-0.5

representation in senior roles. When we break the data down by grade, most levels are close to parity, with women earning a little more on average in several areas. We've included the table above so readers can clearly see where differences sit across the grades and what's contributing to them..

Breakdown by grade:

- Admin: The gap is in favour of women at both mean and median measures.
- Officer: Pay is effectively equal, with no median difference and only a minimal difference at the mean.
- Manager: The gap is in favour of women at both mean and median measures.
- Head of: The gap is in favour of women at both mean and median measures.

For context, the latest Office for National Statistics (ONS) figures for 2024 show a national average gender pay gap of 13.8% (mean) and 13.1% (median) in favour of men. This means that while women nationally still earn significantly less than men, our organisational results are in the opposite direction — with women earning slightly more on average than men.

In previous years, we have compared our figures to national and regulatory sector

WE ENSURE ALL NEW MEMBERS AND EMPLOYEES HAVE AN EDI INDUCTION

A NEW ROLE
OF SPEAKING UP
GUARDIAN
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are disabled, neurodivergent, or who work differently are better supported to thrive and reach their full potential.

Supporting managers to lead diverse teams

This year we developed a GOC Management Style document to ensure that all staff receive line management which reflects the diverse experiences and needs of our workforce. We adopted an inclusive and collaborative approach to its development, establishing a working group involving colleagues from a range of levels, roles, and backgrounds to ensure diverse perspectives were represented. The group were instrumental in shaping the document's content, tone, and focus. We also engaged more widely across the organisation through workshops, all-staff meetings, weekly newsletters, and IRIS articles, ensuring that the final document reflected the values, needs, and lived experiences of our broader workforce.

The document directly responds to recommendations from our 2023 EDI review, which identified the need for greater clarity around management expectations, more inclusive support for employee development, and a more consistent approach to leadership across the organisation.

Tackling discrimination: Freedom to speak up

In 2023-24 we saw an increased number of speaking up referrals from staff that referred to inequality or discrimination. As consequence, we took steps to review our policies and procedures to ensure they were fairer. We also improved our data reporting around employee relations, so there was a greater visibility for our Senior Management Team (SMT) and the Audit, Risk and Finance Committee, which meant leaders were able to identify where issues were emerging and support teams and managers to address concerns proactively.

We also revised our speaking up policy for members, workers and employees to reflect the Freedom to Speak model promoted by the National Guardian's Office. The policy sets

out how to speak up and how the organisation will support individuals when speaking up. It is designed to promote a culture where individuals can speak up about anything that affects public protection or impacts their working life.

All staff have been required to undertake mandatory training to help them understand their specific responsibilities under the speaking up policy. In addition, a new role of Speaking Up Guardian has been developed, in addition to our Speaking Up Champion, to provide an additional point of contact for employees raising concerns. Data in 2024-25 showed that the number of speaking up referrals from staff had decreased with no referrals requiring formal investigation or escalation.

Empowering staff networks

Our staff networks are a crucial part of our EDI efforts at the GOC. They provide peer support and work together to influence and support our work. The networks are open to all employees across the organisation, who either identify with, or are allies of, the networks' purpose.

To ensure that our networks can be as effective as possible, we reviewed the framework for staff networks and have put in place the following support:

- Clarity around the running and development of networks (such as a template for annual planning and budgeting)
- Provided guidance on structural discrimination at managerial level and how to speak up, to better equip our network leads in their roles
- Launched "Empower Hour", a protected one-hour slot each month for colleagues to focus on network activity. All employees are asked to respect the timeslot in solidarity with the networks.

Vanessa Tailor, Chair of Embrace network – "The Empower Hour is honoured by the organisation and when I've used it, it's been helpful to have the dedicated time."

OUR
NETWORKS
HAVE SPARKED
IMPORTANT
CONVERSATIONS

Our networks are led by passionate colleagues and supported by senior sponsors. They have led a range of activities that have raised awareness, sparked important conversations, and strengthened our sense of community.

In March 2025 we launched a new Social Mobility Network to amplify the voices of those from lower socio-economic backgrounds.

Steve Brooker, Director of Regulatory Strategy and Sponsor of the Social Mobility Network – *“My hope for the network is that it provides a safe space for staff to come together to share experiences, get inspiration and learn about the issues. And that we use this understanding to have a stronger focus on social mobility both as an employer and as a regulator. I’m committed to using my role as the sponsor for the network to advocate for social mobility and make it a stronger feature of our EDI work.”*

The LGBTQ+ network held an all-staff quiz to mark LGBTQ+ History Month.

Staff members of Welsh and Irish heritage respectively published articles to mark St David’s Day and St Patrick’s Day.

Our Anti-Racism Group (ARG) organised a powerful series of events focused on equity, representation, and access — with a particular emphasis on sport, health, and science including:

- **Wanderers of Colour:** Ms Ife Akintoye highlighted how her movement is breaking down barriers to outdoor spaces and challenging perceptions of who belongs in nature-based sports.
- **NHS Organ Donation:** Ambassador Praful Aben Shah shared her personal journey to increase organ donation among Afro-Caribbean and Asian communities,

addressing cultural stigma and the need for greater awareness.

- **Alzheimer’s Research:** Dr Yolanda Ohene discussed her groundbreaking work on early detection of Alzheimer’s in underrepresented groups, particularly Black women, and the importance of inclusive participation in research.

These sessions sparked important conversations and reflected the continued relevance of anti-racism in shaping health equity and representation.

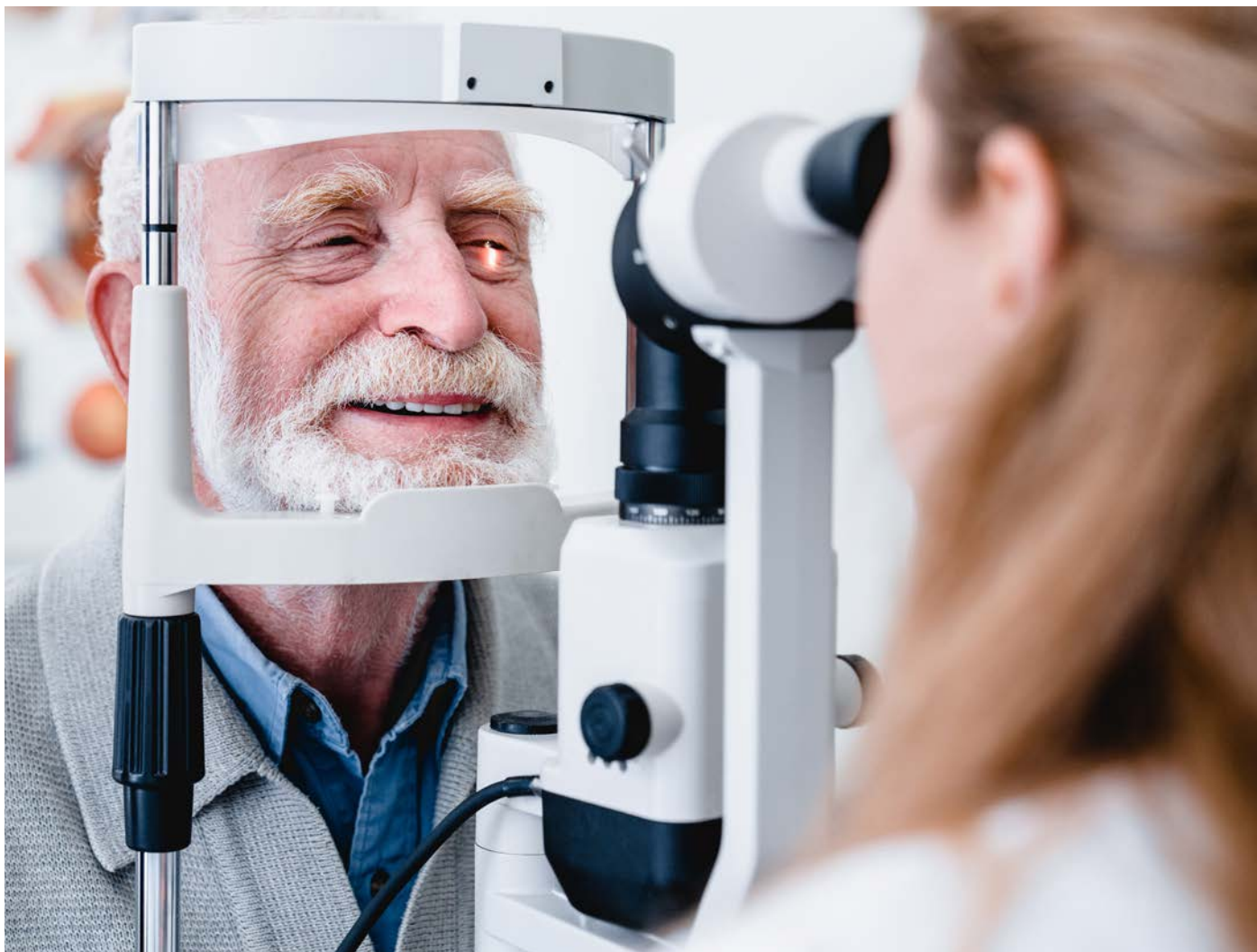
The Women’s Network has made significant progress in shaping a mentoring programme for GOC staff. This initiative was developed in response to feedback from colleagues who expressed a desire for more structured opportunities for personal and professional development. The mentoring programme aims to foster supportive connections across the organisation and create space for shared learning. A pilot phase is now underway, with a small number of mentor-mentee pairs exploring different approaches to mentoring based on their individual goals and interests. The programme has already generated strong interest, and the network looks forward to expanding it as the pilot progresses.

As part of moving our office accommodation to Canary Wharf, we engaged closely with our colleagues and staff networks to help shape an inclusive office experience. Their voices were instrumental in influencing the move — from the choice of location to the accessibility and design of the space. This moment marked an important chapter in the GOC’s story, and we are proud that it was shaped by the people who make the GOC what it is.

Extending wellbeing support to our wider GOC community

We have extended access to wellbeing support via our employee assistance programme to include our workers and committee members. This means our members and workers will be able to access confidential, 24/7 support covering a range of issues, from mental health to financial advice, and ensure that all those who work for the GOC feel supported and valued.





Action Plan 2024-25

This year's action plan marked a transition between the end of our 2020–24 EDI Plan and the start of delivery against our new EDI Strategy for 2025–30. While it continued to reflect the priorities already in place, it also began to align with the new strategic direction and objectives agreed by Council.

The plan focused on six key themes that have shaped our work over the last year:

- Data
- People, learning, and development
- Recruitment and retention
- Policies and procedures
- Community engagement and support
- Leadership and accountability

As we embedded these priorities, some activity was deliberately phased into early 2025 to reflect the handover between EDI Managers and ensure continuity. Updates on each area are outlined over the page.



THE ACTION
PLAN FOCUSED
ON SIX KEY
THEMES

DATA

Programme of work	Strategic objective	Deadline	Progress
Develop a standardised approach to EDI data collection; how and why it is collected, stored, managed and used, with a comms plan to ensure engagement.	PSA Standard 3 Gap Analysis Hooper EDI Review recommendation	December 2024	We reviewed and updated the diversity data we collect, aligning it with changes to the national census and current good practice. These updates were applied across several areas of our work and were supported by new internal guidance to help colleagues understand and implement the changes effectively.
Explore how we use EDI data to make meaningful comparisons.	PSA Standard 3 Gap Analysis	December 2024	We are developing a foundation of consistent data that will improve our data comparisons. The monitoring report has additional intersectional analysis in some areas. We will also use our unfair outcomes research to present some key information about the EDI profile of those registrants referred to us as a regulator.
Expand evidence collection to include lived experience.	EDI Review	March 2025	The lived experience research we commissioned to better understand the barriers people face when accessing care and navigating workplace challenges has now concluded. The published findings will inform our future work as we deliver on the commitments set out in our five-year EDI Strategy.
Collect EDI complainant data for Corporate Complaints.	PSA Standard 3 Gap Analysis	April 2024	We implemented a process for collecting EDI complainant data for Corporate Complaints in 2024. We included messages explaining the reasons we wanted this data and encouraging complainants to fill the form in. However, there has been no uptake from complainants to date. This is compounded by the low number of complaints the GOC receives. We will continue to review our processes and communication intermittently to see how we improve this. As time passes, more data will be collected, and this will make it possible to identify meaningful trends over a few years.
Expand data collection and analysis to facilitate exploration of intersectional evidence.	Outstanding action from 2020-2024 EDI plan	December 2024	We broadened our data collection across workforce, registrant, and complaints processes, with a particular focus on ensuring questions were inclusive and clearly worded. This supports better insight into the experiences of different groups and enhances transparency in how we use EDI data.

PEOPLE, LEARNING AND DEVELOPMENT

Programme of work	Strategic objective	Deadline	Progress
Member, employee and worker EDI induction and development to include concept of organisational discrimination and its impact, including practical skill-based sessions.	EDI Review recommendation	November 2024	We developed and rolled out updated EDI induction materials, now delivered as standard to all new employees, workers and Council/Committee members. Content includes information on our EDI principles, Welsh Language Standards, structural discrimination, and inclusive practice.
Incorporate active EDI language (focused on effects and outcomes) and measurable outcomes within the proposed Performance Behaviours Framework (PBF, formerly KSB) framework.	EDI Review recommendation	January 2025	A critical review of the PBF was undertaken to ensure the six behaviour domains and descriptive behaviours for each reflected our expectations around equality, diversity and inclusion. This was achieved by engaging multiple groups of people in reviewing the framework content and a review by GOC's EDI function.
Develop manager training in making reasonable adjustments.	EDI Review recommendation	May 2024	We developed and delivered reasonable adjustments training for people managers, covering the legal context, disability discrimination, and practical case studies. The sessions also included coaching on how to approach conversations with confidence and sensitivity.
Development opportunities for managers on managing a diverse workforce, including practical skill-based sessions.	EDI Review recommendation	December 2024	Additional training for our managers was developed and delivered on topics such as structural discrimination and understanding reasonable adjustments.
Quality assurance of all externally procured learning & development to ensure progressive, sensitive and inclusive style of delivery.	EDI Review recommendation	June 2024	Learning and Development Procurement Checklist developed for our people and culture team. They are using this to assist them when seeking out training providers.
Workshop with employees and members on meanings of relevant terms, such as fairness, equity and the importance of knowing when to treat people the same or differently.	EDI Review recommendation	March 2025	This activity was planned for delivery in 2024–25 but has been carried forward into the current year to allow for better coordination and engagement. It remains a priority for 2025–26, with plans to shape the session around lived experience insight and link it to our ongoing work on fairness and inclusive decision-making.
CPD Guidance for Registrants to be reviewed to ensure registrants maintain their EDI knowledge and skills.	PSA Standard 3 Gap Analysis	January 2025	Added a page to the published guidance relating to the updated standards of practice and included a line encouraging uptake of EDI courses. In addition, the registrant survey now includes a question on whether participants have done CPD on EDI themes.

RECRUITMENT AND RETENTION

Programme of work	Strategic objective	Deadline	Progress
Analyse EDI data from employee and member recruitment campaigns to highlight and analyse inequality and barriers.	Outstanding action from 2020–2024 EDI plan	January 2025	Initial analysis of member recruitment campaigns has been completed. It has been recognised that this is a significant piece of work in terms of scope, and a phased approach has been developed by the new EDI Manager.
Implement the 2023 Member Recruitment Report to ensure member recruitment is more representative of the diversity of the community.	PSA Standard 3 Gap Analysis	November 2024	Progress continues against all eight recommendations from the 2022–23 Member Recruitment Report, including updating EDI monitoring forms, improving application processes by removing non-essential criteria – resulting in increased applicant diversity.

POLICIES AND PROCESSES

Programme of work	Strategic objective	Deadline	Progress
Review EIA method to include an analysis of organisational discrimination, for use in policy review.	EDI Review recommendation	March 2025	This action has been carried forward into 2025–26 due to transition within the GOC. Revised forms explore how structural discrimination can be more effectively considered within our Equality Impact Assessment (EIA) approach.
Co-produce with staff a consistently applied GOC 'management style.'	EDI Review recommendation	January 2025	This is complete and was co-produced with staff and reflects the priorities identified in the EDI Review. The new GOC management style is now live for all colleagues to use. This new framework sets out the behaviours and actions that line managers—and those being managed—can adopt to support effective, values-led management style in line with our organisational culture.
Co-produce with staff specific and measurable EDI objectives for use by managers and employees.	PSA Standard 3 Gap Analysis	October 2024	This action has been carried forward into 2025–26 to allow for meaningful staff involvement in the development process. A co-production approach will be used to ensure the EDI objectives are specific, measurable, and relevant to both managers and employees.
References to bias and discrimination included in revised Speaking Up guidance and the Raising Concerns pages.	PSA Standard 3 Gap Analysis	October 2024	The guidance on speaking up was reviewed to align with the new standards. The guidance includes explicit reference to structural inequalities and workplace discrimination impacting on a willingness to speak up. The Freedom to Speak Up policy for GOC members, employees and workers has also been revised to align the scheme with best practice as described by the National Guardian's Office.

COMMUNITY ENGAGEMENT AND SUPPORT

Programme of work	Strategic objective	Deadline	Progress
Review staff networks terms of reference and support, including links to organisational decision-making.	EDI Review recommendation	October 2024	Terms of Reference for each of our staff networks were co-designed and implemented, alongside a shared framework for how our equality networks operate. This ensures a more consistent and supported approach across all groups.
Formalise resourcing and 'protected time' for those responsible for running Staff Networks.	EDI Review recommendation	October 2024	A monthly "Empower Hour" has been in place since August 2024. This is dedicated, protected time for staff network chairs to focus on planning and delivering network activities, improving their priorities, and supporting inclusion across the organisation.
Training on structural discrimination to be extended to Staff Networks.	EDI Review recommendation	September 2024	Staff networks took part in a structured training session delivered by the Employers Network for Equality and Inclusion (ENEI), focused on understanding discrimination and taking meaningful action. The session supported by network leads to building confidence, and contribute to an inclusive culture.

LEADERSHIP AND ACCOUNTABILITY

Programme of work	Strategic objective	Deadline	Progress
Draft and seek approval of 2025-2030 EDI strategy.		December 2024	Our new EDI Strategy for 2025-2030 was drafted and approved by the Council in December 2024.
Ensure future EDI strategy includes active language and measurable outcomes.	EDI Review recommendation	June 2024	The 2025-2030 EDI Strategy incorporates clear, active language and measurable outcomes. Each of the four objectives is supported by defined actions and measures, allowing us to track progress, assess impact, and ensure accountability across the organisation.
Establish a working group to ensure there are plans in place to address unfair outcomes in Fitness to Practice (FtP) and unfair differential attainment in training.	PSA Standard 3 Gap Analysis	May 2024	A new working group was established in May 2024 to focus on unfair outcomes in FtP and differential attainment in education and training. The group includes internal and external voices to shape a framework to guide this work as part of our broader commitment to equity, accountability, and improving the experiences of those we regulate.



Action Plan 2025-26

Our EDI Action Plan for 2025–26 sets out the key activities we are taking forward in the first full year of delivering our 2025–2030 EDI Strategy. It builds on the foundations laid in previous years and reflects learning from our lived experience research, monitoring data, and engagement with staff, registrants, and stakeholders.

The plan is organised around the six focus areas aligned to our strategic objectives. Each action includes a timeline and identifies the source of the work, whether from regulatory reviews, internal analysis, or feedback. Where activities span more than one year, we have noted how they will continue into future delivery cycles.

DATA

We will develop our data practice, improving the use of data to direct our work, progressing EDI and removing barriers based on characteristics

Programme of work	To address	Owner	Target for completion
Collect and analyse data on the demographics of our leadership team, decision makers, and members to assess how much they reflect the community we serve ¹ .	PSA Standard 3	EDIM ²	March 2026
Undertake analysis on pay gaps for disability and race and consider reporting options	EDI Strategy	HoP&C ³ , EDIM	March 2026
Analyse EDI data of corporate complaints	PSA Standard 3	EDIM	December 2025
Analyse lived experience research and use findings to inform future work	EDI Strategy	EDIM, HoSP&S ⁴	September 2025

PEOPLE LEARNING AND DEVELOPMENT

We will develop and embed a culture where learning about EDI is encouraged, providing a good understanding of EDI to facilitate inclusiveness for our employees, workers, members, registrants, and the public

Programme of work	To address	Owner	Target for completion
Develop and deliver cultural safety training for all staff	EDI Strategy	EDIM	December 2025
Pilot staff mentoring programme and design evaluation approach	EDI Strategy	EDIM, Staff network leads	February 2026
Support embedding Speaking Up Framework across GOC	EDI Strategy	CoS ⁵ , EDIM	Originally due in July 2025, this action has been delayed following the EDI Manager transition in June. Recruitment for the Speak Up Guardian is now underway and will continue in the second half of the year.
Support training for employees on undertaking EQIAs	PSA Standard 3	HoSP&S ⁶ , EDIM	November 2025
Workshop with employees and members on meanings of relevant terms, such as fairness, equity and the importance of knowing when to treat people the same or differently	EDI Action Plan 2024-25	EDIM	November/December 2025

RECRUITMENT AND RETENTION

We will develop our recruitment practice so that EDI is embedded into all processes, to ensure we are inclusive to all

Programme of work	To address	Owner	Target for completion
Scope and deliver employee recruitment review	EDI Strategy	HoP&C, EDIM	Phase 1 July/August 2025
Acquire Disability Confident Level 2 for employees and members	EDI Strategy	HoP&C, EDIM	This accreditation is ahead of schedule and achieved certification in January 2025 for employees.
Review the EDI elements of the Staff Survey	EDI Strategy	EDIM	September 2025

POLICIES AND PROCEDURES

We will adopt an approach that is inclusive and equitable and supports both managers and employees in ensuring fairness and accountability

Programme of work	To address	Owner	Target for completion
Develop and put in place an EDI Policy	EDI Strategy	HoP&C, EDIM	October 2025
Support the EDI elements of the first thematic review	EDI Strategy	EDIM, HoSP&S	March 2026
Consider analysis of FtP outcomes	PSA Standard 3	EDIM, CoS	November 2025
Review equality impact assessment (EqIA) method to include an analysis of organisational discrimination, for use in policy review.	EDI Action Plan 2024-25	EDIMHoSP &S	March 2026

COMMUNITY ENGAGEMENT AND SUPPORT

We will nurture a supportive community where employees, members and workers feel they belong, building mutual trust and openness.

Programme of work	To address	Owner	Target for completion
Develop guidance around staff network succession planning and support	EDI Strategy	EDIM	Following the appointment of a new EDI Manager, the focus has been on sustaining momentum within staff networks and a look to the future review. Succession planning guidance will be developed as part of this review.
Support the monitoring of the Reward and Recognition process in terms of EDI	EDI Strategy	EDIM	March 2026

LEADERSHIP AND ACCOUNTABILITY

We will set out clear, defined actions to strengthen accountability as a world-class regulator

Programme of work	To address	Owner	Target for completion
Seek opportunities to collaborate with other healthcare regulators on providing guidance and awareness on emerging EDI issues such as weight discrimination	EDI Strategy/PSA Standard 3	EDIM	March 2026
Review the findings of the public perceptions and registrant surveys	PSA Standard 3	HoSP&S, EDIM	October 2025
Integrate social mobility considerations into our EDI work across the organisation, including data collection and future EDI interventions/engagements	EDI Strategy	EDIM	January 2026