

Equality, Diversity and Inclusion (EDI) Policy

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Author: EDI Manager
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We want this policy to reflect the needs and experiences of everyone at the GOC. If you have ideas or feedback on how we can make it more inclusive, please share them with us at edi@optical.org. Your voice helps us to keep improving and ensure our policies work for everyone.

1. Introduction

- 1.1 At the General Optical Council (GOC) we have a strong commitment to equality, diversity and inclusion, where our workforce is valued and respected for who they are.
- 1.2 The GOC is committed to going beyond meeting our legal obligations under equalities law. For us, equality, diversity and inclusion are about treating everyone fairly, with empathy and respect. Our values underpin how we work with each other and how we deliver our work.
- 1.3 The GOC is committed to being an organisation that has zero tolerance for all forms of unlawful or unfair discrimination, harassment, and victimisation.
- 1.4 We also recognise that good employment practice is the key to ensuring we meet our legal responsibilities to the Public Sector Equality Duty (PSED), set out in the Equality Act 2010.
- 1.5 The aim is for our workforce to be truly representative of all sections of society and of the people we serve, and for every everyone to feel respected, valued, and able to thrive.
- 1.6 This policy sets out the GOC's commitment to equity and inclusion in all aspects of employment. It covers not just how we recruit, but how people are treated throughout their time with us, from joining to leaving.
- 1.7 All of our workforce is encouraged to provide feedback on the inclusiveness of this and all of our policies.

2. Purpose

- 2.1 The purpose of this policy is to show our commitment to operating in a principled, fair and transparent manner and in a way that is free from discrimination, harassment and victimisation. We aim to promote, celebrate and utilise the benefits of diversity and equality in all of our activities. This includes engaging fairly and equally with members of the public, registrants, current and prospective members and employees.
- 2.2 The GOC is committed to eliminating individual and institutional discrimination, harassment and victimisation. This includes discrimination on the basis of the protected characteristics set out in the Equality Act 2010 (England, Scotland and Wales) and in the equalities legislation of Northern Ireland, which are:
 - age
 - gender reassignment
 - being married or in a civil partnership

- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation.

2.3 We respect that how people identify is deeply personal and may sit outside the specific terms of the Equality Act 2010. The GOC is committed to supporting and including everyone regardless of how they identify or express themselves.

2.4 The GOC is committed putting our mission and values into practice. Our values of fairness, respect, empathy and integrity guide how we work with each other, how we make decisions, and how we deliver our services.

2.5 The aim is for our workforce to be truly representative of all sections of society and our service users, and for everyone to feel respected, valued and able to thrive.

3. Scope: Who the policy applies to

3.1 This policy applies to employees, contractors, members, workers and consultants. It also applies to other stakeholders such as customers, suppliers and visitors.

3.2 This policy applies to all aspects of employment, including recruitment, development, promotion and retention. We are committed to ensuring these processes are fair and equitable for everyone, regardless of age, race, colour, religion or belief, disability, neurodivergence, nationality, ethnic origin, sex, gender identity or expression, sexual orientation, marital or civil status, caring responsibilities, parental or maternity/paternity status, HIV status, social or employment background, political affiliation, trade union membership, or any other personal trait or circumstance.

4. Our commitments

4.1 **Your responsibility:** It is up to everyone to create an environment where we feel safe and supported at work. This will often mean challenging your own biases, being open to different points of view, different lived experiences and allowing different voices to contribute. You must comply with this and any other associated policies and procedures, and ensure that:

- You role model professional behaviour and good practice, recognising that this directly impacts the organisation's reputation and its ability to deliver fair and inclusive services.
- You take personal responsibility for upholding a working environment that is respectful, inclusive and free from discrimination, harassment, bullying

or any other unacceptable behaviour. This includes being mindful of the impact of your actions, supporting colleagues who may be affected, and where appropriate/safe, challenging inappropriate conduct when it arises.

- You must support and follow the organisation's approach to promoting equality and preventing discrimination in both employment and service delivery. This includes:
 - Not discriminating when involved in recruitment, selection, promotion, transfer, or training decisions.
 - Not encouraging or pressuring others — including colleagues, union members or managers — to engage in unlawful discrimination, harassment, or bullying in any context.
 - Not victimising individuals for raising a complaint or grievance, or for supporting someone else who has.
- You inform your managers if you suspect that discrimination, harassment, bullying, abuse, victimisation, or offensive behaviour has taken place.
- You follow the GOC Grievance Policy and procedure in situations where you have experienced discrimination, bullying or harassment.

4.2 The GOC is committed to fostering a culture where employees can approach their manager or supervisor and raise a concern. Whatever their concern, they have a right for it to be considered, discussed and resolved where possible. The GOC's Freedom to Speak Up Policy supports this ethos and outlines how employees can raise concerns in a safe and constructive way. For examples of inappropriate behaviour linked to protected characteristics, employees are signposted to the GOC guidance on bullying, harassment and discrimination in the above Grievance Policy and procedure.

4.3 **Council:** Council provides strategic leadership and oversight of the GOC's commitment to equality, diversity and inclusion. As trustees of a registered charity, Council members set the tone from the top by ensuring that inclusion is embedded across our governance, decision-making and regulatory work. They are responsible for:

- Championing equality, diversity and inclusion in all aspects of the GOC's work and leading by example in their conduct and decision-making.
- Holding the Executive to account for delivering on the organisation's EDI strategy, objectives and statutory duties.
- Considering equality impacts and opportunities when shaping policy, regulation, and strategy.
- Promoting the GOC's values of fairness, empathy and respect in their interactions with colleagues, registrants and the public.

4.4 **Senior management:** The Senior Management Team (SMT) plays a key role in leading by example, creating an inclusive culture, and challenging discrimination at a strategic and operational level. They must:

- Ensure the policy is put into practice by assigning responsibility for developing and implementing it, and by making sure it follows UK law.
- Live the values and principles of this policy in their actions and behaviour at work and promote EDI in all areas of work.
- Ensure all employees within their area of responsibility are informed about this policy and other associated policies and procedures and apply this policy and procedure in a fair and equitable manner.
- Develop a culture where employees are supported and assisted to understand, achieve and maintain the required standards of conduct.

4.5 **People managers:** People managers play an important role in supporting and advising their teams, as well as challenging discrimination. They must ensure this policy is fairly and consistently applied by both themselves and those that they manage and:

- All employees are made aware of the contents and the importance of observing the principles of equality, diversity and inclusion.
- Provide support and direction about the behaviours expected of your employees at work.
- All practices and policies address any unfair practices of which they are aware, whether or not a complaint has been made.
- Any breaches of this policy, concerns or complaints to be dealt with quickly and effectively through the relevant related policies listed in this policy. Live our values and be positive role models for your employees.
- Ensure you and your employees attend/complete our mandatory equality and diversity training.

4.6 **People and Culture:** The People and Culture team is responsible for providing advice and guidance to any employee on the application and effective implementation of this policy. They also have responsibility for ensuring that the duty to promote this policy is observed, and the general and specific duties of equality legislation are observed. For example, ensuring policies, procedures and people practices are regularly reviewed for fairness, inclusivity and legal compliance, develop and deliver training and resources to build awareness and confidence across the organisation, and provide clear, accessible advice and guidance to employees and managers on how to apply the policy in everyday situations (e.g. recruitment, adjustments, progression, performance management).

4.7 **Freedom to Speak Up Guardian:** The Freedom to Speak Up Guardian provides an independent and impartial point of contact for those who wish to raise concerns about behaviours, culture, or practices that may affect wellbeing or integrity. The Guardian offers a confidential and supportive space to talk, signposts individuals to appropriate routes for advice or action, and promotes a psychologically safe culture where everyone feels able to speak up without fear of detriment. Working closely with People and Culture, the strategic lead for Speaking Up and senior leaders, the Guardian also helps raise awareness of speaking up across the organisation and shares anonymised insight to support learning and improvement.

5. Our legal duties and commitment to equality of opportunity

5.1 As a public body, the GOC is committed to meeting its legal obligations under the Public Sector Equality Duty, which requires us to give due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people from different backgrounds.

5.2 These duties are more than a legal requirement; they are central to how we work and the culture we aim to create. They shape our policies, our decision-making, and how we deliver our services.

5.3 You can read more about:

- [The Equality Act 2010](#) (England, Scotland and Wales).
- Equalities legislation of Northern Ireland, summarised at [ECNI - The Law, Equality Legislation, Equality Commission, Northern Ireland](#) and including a range of Orders and Regulations such as the Fair Employment and Treatment (Northern Ireland) Order 1998).
- [The Public Sector Equality Duty](#)

6. Discrimination

6.1 The following table outlines the different types of discrimination and harassment covered by this policy, with practical examples to support understanding.

Term.	Definition.	Example.
Direct discrimination	Treating someone less favourably because of a protected characteristic.	A qualified candidate is not offered a job because they are pregnant.

Term.	Definition.	Example.
Indirect discrimination	Applying a policy or practice that disadvantages people with a protected characteristic.	A team meeting is always scheduled at 4:30pm, and the manager refuses to consider changing the time. A Muslim colleague regularly attends afternoon prayers and is therefore excluded from contributing.
Associative discrimination	Discriminating against someone because of their association with a person who has a protected characteristic.	An employee with caring responsibilities for a disabled partner is overlooked for a secondment. The manager assumes they won't be reliable due to their caring duties.
Perceptive discrimination	Discriminating against someone because they are <i>perceived</i> to have a protected characteristic, whether they do or not.	A team leader expresses concern about managing a new starter, assuming (incorrectly) that the person is gay, and believing this will lead to "awkward conversations" with other team members.
Harassment	Unwanted behaviour related to a protected characteristic that violates someone's dignity or creates a hostile environment.	A colleague repeatedly makes jokes about someone's accent and cultural background, saying they are "just having a laugh." The person feels uncomfortable and undermined.
Sexual harassment	Unwanted conduct of a sexual nature that creates an intimidating or offensive environment.	A manager makes inappropriate comments about an employee's appearance and stands too close during one-to-one meetings, making the employee feel uneasy and intimidated. Please also refer to Sexual Harassment Policy.
Victimisation	Treating someone badly because they made or supported a complaint about discrimination or harassment.	A GOC employee supports a colleague who raised a grievance about racial discrimination. Later, they are excluded from team opportunities, with one manager labelling them a "troublemaker."

7. Recruitment and selection

7.1 The GOC is committed to fair and inclusive recruitment. How we attract, assess and appoint people matters, not just for legal compliance, but for building a workforce that reflects the public we serve.

- 7.2 We recognise that the recruitment process can create barriers for some people. This might be due to where roles are advertised, how interviews are run, or how decisions are made. We are committed to removing unfair barriers and taking steps to improve access to opportunities.
- 7.3 All selection decisions, including recruitment, promotion and redundancy, must be based on merit and relevant criteria. We want to ensure that no one is treated less favourably because of a protected characteristic, and that shortlisting and interviews are carried out fairly, consistently, and with awareness of bias.
- 7.4 It is also important that we monitor and understand who is applying to work at the GOC. Monitoring helps us identify whether certain groups are underrepresented or disadvantaged at different stages of the recruitment process. Where appropriate and lawful, we may take positive action to address this.
- 7.5 The detail of how we apply these commitments in practice is set out in our Recruitment Policy.

8. Training, promotion and career development

- 8.1 Inclusion at the GOC means ensuring fair access to development and career progression, and not just fair treatment at the point of recruitment.
- 8.2 We know that without careful attention, inequalities can arise in how people are supported to grow and progress at work. This is why we are committed to monitoring access to training and promotion, and to making sure decisions are fair and based on merit not assumptions or informal networks.
- 8.3 We also recognise that staff from some backgrounds may face additional barriers to career development. Where appropriate, we may take targeted steps to support underrepresented groups, such as through mentoring or development programmes.
- 8.4 Everyone should have a fair chance to progress at the GOC, and to take up the same opportunities to thrive and develop in their roles.
- 8.5 We will continue to ensure that all new starters have equality, diversity and inclusion training as part of their onboarding programme. This training will also be an annual activity for all our people to support our inclusive culture.
- 8.6 We will continue to strive to support our people in attending diversity and inclusion initiatives, for example, by attending events and workshops organised

by the employee inclusion networks to educate themselves on the challenges faced by others and how to help alleviate these in the workplace.

9. Health, disability and neurodiversity inclusion

- 9.1 The GOC is committed to creating an environment where colleagues feel safe and supported to share information about a disability, neurodivergence, or long-term health condition, should they wish to do so. It is our responsibility to listen, respond and provide appropriate support to help remove or reduce barriers at work.
- 9.2 If you are an employee and you're experiencing difficulties related to your condition, your line manager and the People and Culture team will work collaboratively with you to identify and implement reasonable adjustments that enable you to perform your role effectively.
- 9.3 We are proud to hold Disability Confident level II accreditation for staff recruitment, reflecting our ongoing commitment to inclusive recruitment and employee practices.

10. Staff networks

- 10.1 At the GOC we are proud to have several employee-led staff networks that provide supportive spaces for colleagues and celebrate the diversity of our workforce. These networks play an important role in shaping an inclusive culture by sharing lived experiences, influencing policy and practice, and helping ensure that our approach to equality, diversity and inclusion reflects the people who make up our organisation.
- 10.2 Our networks are for GOC employees, though we welcome contribution and input from our members.

11. Monitoring and review

- 11.1 The GOC monitors its work in relation to EDI through several of key indicators, including data relating to our people, registrants and stakeholders. We produce an annual action plan which is approved by Council. SMT receives monitors progress on delivery of the plan throughout the year. At the end of the year, we produce an annual report on how we have delivered against the plan and the work we have undertaken.
- 11.2 As part of this, the GOC monitors and reviews the diversity data of our registrants, current and prospective members, and employees. This helps us build a clearer picture of our diversity profile and identify areas where we can

improve. We collect this information through a range of secure channels, and it can be shared confidentially or anonymously. Details about how we use and protect this information can be found by reading our data privacy statement on our website [here](#).

12. Raising a concern

- 12.1 We recognise that raising a concern about discrimination, harassment or victimisation can be difficult. If this happens, you will be treated with dignity and respect throughout the process. All complaints will be taken seriously, handled promptly and confidentially, and support will be offered where needed.
- 12.2 If you believe that you have experienced discrimination or inappropriate behaviour, you can raise through our Grievance Policy and procedure. You can also speak in confidence with your Line Manager, the People and Culture teams, or Freedom to Speak Up Guardian for advice or support before deciding how to proceed.
- 12.3 Individuals who are not employees can raise EDI-related concerns through the Corporate Complaints process (for members of the public) or directly with the EDI Manager or through the Freedom to Speak Up routes (for registrants and stakeholders). All concerns will be managed in line with our published procedures.
- 12.4 Discrimination, harassment and victimisation are regarded as misconduct and may lead to disciplinary action being taken. No one will be penalised for raising a genuine concern or supporting someone else who does.

13. Related policies

13.1 This policy is supported by a wider set of organisational policies and procedures, including:

- Corporate Safeguarding Policy
- Disciplinary Procedure
- Flexible Working Policy
- Freedom to Speak up Policy
- Grievance Procedure
- Maternity Policy
- Paternity Policy
- Sexual Harassment Policy
- Special Leave Policy