General Optical Council

Approach to Equality, Diversity and Inclusion (EDI) Monitoring

1.   Statement

1.1   As a public body, we are committed to promoting and developing equality and diversity in all areas of our work and our sector, ensuring compliance with the Equality Act and Public Sector Equality Duty as well as the Human Rights Act and other relevant legislation.

1.2   In line with our Equality, Diversity and Inclusion (EDI) objectives and our Equality Action Plan, we are committed to monitoring our EDI activities, analysing this information and publishing it in an accessible format.

2.   Scope

2.1   This statement applies to all our EDI monitoring activities. Including our approach to monitoring the diversity of employees, members, applicants for employee or member roles, registrants and others who engage with us, such as by responding to consultations or raising complaints.

3.   Why monitoring EDI is important

3.1   There are numerous reasons why we monitor EDI activity. The key reasons for us to monitor EDI activity are to:
3.1.1 meet our duties under the Equality Act;
3.1.2 value diversity and be inclusive, to enable us to attract and retain the best candidates from all backgrounds and better serve the public;
3.1.3 provide information to be able to inform Equality Impact Assessments (EIAs);
3.1.4 provide information and analysis to inform our EDI action plan to continuously develop how we promote EDI within our organisation and within our functions; and
3.1.5 provide information and analysis data to help us assess if we have met our equality objectives.

4.   Monitoring Methods

4.1   For measuring EDI, a cross-section of methods are required to provide a more rounded understanding of how diversity is considered and valued.

Statistical analysis
4.2   We recognise that, where sufficient data is available, statistical analysis is a useful method to evaluate how 'diverse' an organisation or group is by

conducting detailed analysis to identify trends or areas of potential discrimination or inequality.

4.3 In addition we recognise that, in order properly to fulfil the public sector equality duty, we may have to monitor matters such as recruitment, promotion, training, pay, grievances and disciplinary action by reference to the protected characteristics of employees.

4.4 We are committed to develop our statistical equality monitoring capabilities and will build upon our current analysis capabilities.

Feedback

4.5 We recognise that statistics on their own may not provide insight into the organisational culture. Therefore we plan to use surveys, focus groups and other methods of feedback, where individuals are asked about their perceptions of fairness, discrimination, inclusiveness within the organisational culture to measure EDI activity. The results of such activity often give clear indications of the areas requiring action to promote and develop EDI within the organisation.

4.6 This feedback will be reviewed on an annual basis and all feedback will be considered seriously and any individuals will be encouraged to contribute their views, without fear of reprisal.

Equality Impact Assessments (EIA)

4.7 Equality Impact Assessments (EIAs) identify equality and diversity considerations when designing policies and processes.

4.8 We require all policies and procedures to be screened to determine if a full EIA is to be completed. If a full EIA is completed, any actions identified in the EIAs are transferred to the Equality Action Plan. The EIAs will be reviewed within the appropriate timeframes and actions identified addressed.

5. What characteristics we will monitor

5.1 When we consulted stakeholders on our EDI Scheme we asked "For each group we collect data on, which of the protected characteristics should we gather monitoring data for?" Overall, the view of respondents was that we should collect information on all of the protected characteristics, because otherwise it will be difficult for us to monitor the impact on all groups and we may prevent an unexpected issue being identified through analysis.

5.2 There are many alternative ways of sub dividing the categories on a monitoring form. In order to enable us to compare our information to census monitoring information we use the same categories as used by the Office of National

Statistics consistently across all our monitoring activities. These are included in the monitoring form – Annex A.

6.   How we analyse our monitoring information

6.1   By improving our monitoring through capturing more complete data, gathering feedback and completing EIA's, we will have a better base to assess impact and advance the promotion of equality and diversity within our organisation and in relation to our public body remit. We will be able to complete more detailed analysis by comparing more than one grouping of characteristics simultaneously, which will help us to identify if any of our practices are indirectly discriminatory.

6.2   Annually we will analyse the monitoring information in the following ways:
6.2.1 compare with national data to see how far our employees, members and registrants reflect national diversity;
6.2.2 compare with previous data, feedback and EIA's and look for patterns or trends, to consider if there is a cause for concern and what we may need to do about it;
6.2.3 assess whether we have met our equality aims; and
6.2.4 help set appropriate targets for our equality action plan.

6.3   Over time we will increase the analysis undertaken, which may include:
6.3.1 comparing the position and treatment of employees, members and registrants with certain protected characteristics;
6.3.2 comparing recruitment and retention rates for employees/members with different protected characteristics;
6.3.3 considering the number of people with different protected characteristics who access and use our services in different ways;
6.3.4 considering customer satisfaction levels and informal feedback from service users with different protected characteristics and results of consultations;
6.3.5 considering complaints about discrimination and complaints from people with different protected characteristics; and/or
6.3.6 considering service outcomes for people with different protected characteristics.

6.4   Where we identify trends or concerns we will identify actions, which may include:
6.4.1 planning positive action campaigns;
6.4.2 completing or reviewing equality impact assessments;
6.4.3 continuing to monitor and/or conducting further research.

7.   Presentation of Information

Publishing our Scheme

7.1   We will publish an Equality, Diversity and Inclusion (EDI) Scheme every four years, which includes our EDI objectives. The scheme will be developed with the desire to embed and promote equality, diversity and inclusion within our organisation in line with our EDI commitments.

Publishing our monitoring information

7.2   We will publish an annual monitoring report to demonstrate compliance with the Equality Duty which will identify the progress we have made against our EDI objectives and actions for inclusion within our EDI action plan. This report will include monitoring information we have collected in that year together with any analysis or identifiable trends from previous years. We will publish information to show as far as possible how we have considered how the decisions we make, and the services we deliver – both as an employer and a service provider – affect people who share different protected characteristics. Where possible we will include details of policies and programmes that have been put in place to address equality concerns and information from employee surveys.

7.3   We will ensure that the report is presented in an accessible way and consider different formats on request.

7.4   The monitoring information published will include:
    7.4.1   information relating to employees and members who share protected characteristics (we recognise that as we have less than 150 employees/members this is not a legal duty but we believe this is in line with our values to be transparent, will help us assess impact, and is in line with the general expectations of us as a public body and a charity); and
    7.4.2   information relating to people who are affected by our policies and practices who share protected characteristics (for example, registrants).

7.5   If information or data sets are incomplete, we will consider whether to publish the information available with an explanation of how the data gap will be filled in future. If we are concerned that the information is not fully representative and that by publishing the information we may lead others to make false conclusions we may decide not to publish until we have a more complete or representative data set.

Publishing our Equality Impact Assessments (EIAs)

7.6   We will generally publish all EIAs on our website, as well as include them in any papers being considered by our Council. If we decide not to publish an EIA we will explain why we have taken this decision.

8.   Data Protection considerations for EDI monitoring publications

8.1   Individual monitoring data will be shared on a 'need to know' basis, and will be protected and securely stored in line with data protection rules.

8.2   We will not publish any information which would breach the Data Protection Act 1998. Information published will not identify individuals and we will not publish information about groups of fewer than ten people. Instead, we will represent small numbers using an asterisk or a range (for example, <10). This is to avoid a situation where individuals are identifiable, even if their names are not used.

8.3   For other information on Data Protection, and how sensitive information will be handled, please refer to our Information Governance policies.

Annex A – Equality, Diversity and Inclusion (EDI) Monitoring Form

More about you

The GOC is committed to treating everyone fairly, regardless of age, disability, gender reassignment, ethnicity, religion or belief, gender, sexual orientation, marriage and civil partnership, pregnancy and maternity. Completing this form is voluntary – it will help us to measure the impact of our processes, practices and culture. You also have the option to skip questions with 'prefer not to say'. For more information about why we do this and what we hope to achieve, please see our Approach to EDI monitoring statement. Information provided will be treated in the strictest confidence under the Data Protection Act 1998 and will be only used for monitoring purposes, including publication in our annual monitoring report. **No information in this section will be used in any way which allows any individuals to be identified.**

Name:

GOC Number (if applicable):

Gender

☐ Female ☐ Male ☐ Prefer not to say

Age

☐ 16-24 ☐ 25-34 ☐ 35-44 ☐ 45-54 ☐ 55-64 ☐ 65+
☐ Prefer not to say

Sexual orientation

☐ Bisexual ☐ Heterosexual/Straight ☐ Gay/Lesbian/Homosexual
☐ Other ☐ Prefer not to say

Disability

The Equality Act 2010 defines disability as a physical or mental impairment which has a substantial long-term effect on a person's ability to carry out normal day to day activities. Do you consider yourself to have a disability?

☐ Yes ☐ No ☐ Prefer not to say

Gender Identity

My gender identity is different from the gender I was assigned at birth:

☐ Yes ☐ No ☐ Prefer not to say

Pregnancy/Maternity

Are you pregnant, on maternity leave, or returning from maternity leave?

☐ Yes ☐ No ☐ Prefer not to say

Ethnicity

White	**Mixed / multiple ethnic groups**
☐ English / Welsh / Scottish / Northern Irish / British ☐ Irish ☐ Gypsy or Irish Traveller ☐ Any other white background – please specify:	☐ White and Asian / British ☐ White and Black Caribbean / British ☐ White and Black African / British ☐ Any other mixed / multiple ethnic background – please specify:
Asian / Asian British	**Black / Black British**
☐ Indian / Indian British ☐ Pakistani / Pakistani British ☐ Bangladeshi / Bangladeshi British ☐ Chinese / Chinese British ☐ Any other Asian background – please specify:	☐ African / African British ☐ Caribbean / Caribbean British ☐ Any other Black background – please specify:
Other ethnic group ☐ Arab / Arab British ☐ Any other ethnic group – please specify:	☐ **Prefer not to say**

Marital status

☐ Civil partnership	☐ Divorced/legally dissolved	
☐ Married	☐ Partner	☐ Separated
☐ Single	☐ Not stated	☐ Prefer not to say

Carer Responsibilities

Do you perform the role of a carer?

☐ Yes   ☐ No   ☐ Prefer not to say

Religion/Belief

☐ No religion	☐ Buddhist	☐ Christian
☐ Hindu	☐ Jewish	☐ Muslim
☐ Sikh		

☐ Any other religion / faith – please specify _____

☐ Prefer not to say

Many thanks for completing this confidential monitoring form.