General Optical Council

EQUALITY, DIVERSITY, AND INCLUSION

ANNUAL REPORT FOR THE YEAR ENDED 31 MARCH 2024

General Optical Council

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Committing to excellence

An introduction from the Chief Executive and Registrar

Equality, diversity and inclusion (EDI) is at the heart of everything we do at the General Optical Council

We are committed to being an EDI leader in the regulatory space and this is reflected in the organisational review we undertook this year, as well as our current and future five-year strategies, including a specific EDI strategy that we are developing for 2025-2030. Our goals in this area are aspirational, and our reflections on our progress over the last year has informed the development of our new EDI strategy, recognising that what we learn from the work we are engaged in, and people and organisations we collaborate with, can be as important as achievement of the EDI objectives themselves, as we continue

our journey towards being a culturally safe organisation. This report describes our most significant achievements over the last twelve months, including progress against our EDI action plan 2020-2024, and reports on our EDI monitoring data for employees, members and workers, and registrants.

As the regulator, our statutory role is to protect the public and uphold public confidence in the professionals and businesses we regulate. We are also responsible for supporting our registrants – the 33,705 optometrists, dispensing opticians, student opticians and optical businesses on our register – and our employees, workers, and members. The breadth of this responsibility poses many challenges, but also presents important

FOR THE SECOND YEAR IN A ROW, THE GOC MET ALL 18 OF THE PSA STANDARDS

opportunities to address inequity, promote diversity, and foster inclusion in all elements of our work.

Supporting our registrants is crucial for ensuring that we maintain high standards in optical care. We have begun work to tackle bullying, abuse, harassment, and discrimination of registrants in their workplace as identified in our annual Registrant Survey, and to better understand causes and impact.

We are transforming our EDI data collection methods, including identifying and implementing new methods of encouraging voluntary submission of EDI data, so that we can be assured of the comprehensiveness of the data we hold, and its use to inform policy development and impact assessment. We are using the data we hold to begin to understand and identify any unfairness in fitness to practise cases and student attainment. We have also removed gender from our public register, ensuring that trans, non-binary, and female registrants are better protected from discrimination.

Significant steps to improve patient experience have been undertaken, with our Public Perceptions Survey allowing us to identity and reduce barriers for access to eye care, especially for marginalised patients. We are moving beyond our statutory duties by looking at vulnerability, carer status, and socio-economic background as well as the formalised protected characteristics, to ensure we are serving our employees, registrants, and the public as inclusively as possible.

The Welsh Language Standards came into effect during this year and much work has been undertaken to ensure we are compliant with this legislation and are as inclusive of Welsh speaking employees, registrants, and patients as possible.

We are extremely proud that, for the second year in a row, the GOC met all 18 of the Professional Standards Authority's (PSA) Standards of Good Regulation. Their review highlighted EDI as area where the GOC performed well. This was a welcome acknowledgment of our commitment to EDI and to sharing good practice.

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. Our staff engagement networks continue to flourish, providing opportunities for learning and development around EDI, and promoting employee wellbeing and engagement.

In working across the regulatory space, we have had the opportunity to share learning and collaborate with other healthcare focused organisations to ensure best practice. As an eye care regulator, we have chosen to introduce a new internship with the Thomas Pocklington Trust, a charity that supports blind and partially sighted people to access work opportunities, which has also helped us improve the accessibility of our organisation more generally. Our Council Associate scheme seeks to improve the diversity of our Council and has continued into its third year.

We continue to publish our gender pay gap data and have ambitions to expand this in the future to identify potential pay gaps around other marginalised identities.

All of this ambitious work has laid the path for the future, and we look forward to continuing in this direction, valuing the learning and insight gained from the EDI journey, as well as its successful outcomes.

Leonie Milliner
Chief Executive and Registrar

Understanding the landscape

The progress we have made regarding EDI over the last twelve months has only been possible by having a clear and honest view of the EDI landscape both within and outside of the GOC. If we are aware of areas where we can improve, and how our championship of EDI issues and achievement of actions are achieving an impact, this allows us to set an ambitious and meaningful agenda for the future. As a responsible regulator with a commitment to being an EDI leader in the regulatory space, much of the work we have undertaken in the past year has focused on understanding the landscape of EDI we operate in.

Addressing bullying, abuse, harassment, and discrimination

In October we published a joint statement alongside organisations from across the optical sector committing to a zero-tolerance approach to bullying, abuse, harassment, and discrimination across all working environments. This followed a roundtable we convened to discuss findings in our 2023 registrant survey, which showed that registrants reported experience of significant levels of bullying, abuse, harassment, and discrimination. Our 2024 registrant survey shows similar trends in this area, with high levels of experiences of bullying, abuse, and harassment persisting.

It is essential that we hear about experiences of bullying, abuse, harassment, and discrimination so that we can better understand the causes and find potential solutions. In the last twelve months, half of survey respondents (50%) said they had personally experienced some form of bullying, abuse, and harassment in

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FEMALE RESPONDENTS WERE MORE LIKELY TO HAVE EXPERIENCED BULLYING

work (or study, for those in education) and more than three in ten respondents (31%) had experienced discrimination. We are committed to making meaningful change in this area. We plan to undertake research into registrants' lived experiences so that we might better understand what bullying, abuse, harassment, and discrimination looks like in the optical sector, who it impacts, and who is responsible for it. This is reflected in our EDI action Plan 2024-2025.

Not only is bullying, abuse, harassment, and discrimination detrimental to the wellbeing of registrants, our survey findings have shown that it can also impact their career plans. Registrants who responded to our survey saying they planned to switch to locum work, reduce their hours, take a career break, or leave the profession were more likely to have had an experience of bullying, abuse, harassment, and discrimination at work. This was also true for those who reported that they found it difficult to provide patients with the sufficient level of care they needed. It in the best interests of individual registrants to better prevent and respond to bullying, abuse, harassment, and discrimination, beneficial to the sector as a whole, and instrumental in ensuring public safety.

Bullying, abuse, harassment, and discrimination is also not experienced equally amongst registrants and there are clear links to certain protected characteristics. The survey findings showed that female respondents were more likely to have experienced bullying, abuse, harassment, and discrimination from all sources when compared with male respondents. Similarly, younger respondents aged under 35 and those aged 35-54 were more likely to report bullying, abuse, harassment, and discrimination when compared with those aged 55+. Respondents with a disability were also more likely to have experienced bullying, abuse, harassment, and discrimination when compared with those who didn't declare a disability. Those from global majority backgrounds were more likely to have experienced bullying, abuse, and harassment specifically from managers, other colleagues, and tutors, lecturers or supervisors, when compared with those of White British or White Irish ethnicity. However, no significant

difference in ethnicity was found in relation to bullying, abuse, and harassment from patients and service users. Those from the global majority were more likely to have experienced discrimination, particularly Asian and Asian British respondents, 44% of whom reported an experience of discrimination in the last twelve months.

It was found that the primary source of bullying, abuse, harassment, and discrimination comes from patients, service users, their relatives, and other members of the public, with 41% of respondents having at least one experience of bullying, abuse, and harassment from this source and 26% respondents reporting at least one experience of discrimination. GOC registrants are more likely to experience bullying, abuse, harassment, and discrimination from patients or the public than the national NHS average. While experiences of bullying, abuse, harassment, and discrimination were also reported to have come from managers, other colleagues, and tutors, lecturers, or supervisors this was less frequent, although experiences of bullying, abuse, and harassment from managers were more also more likely for GOC registrants than the national NHS average.
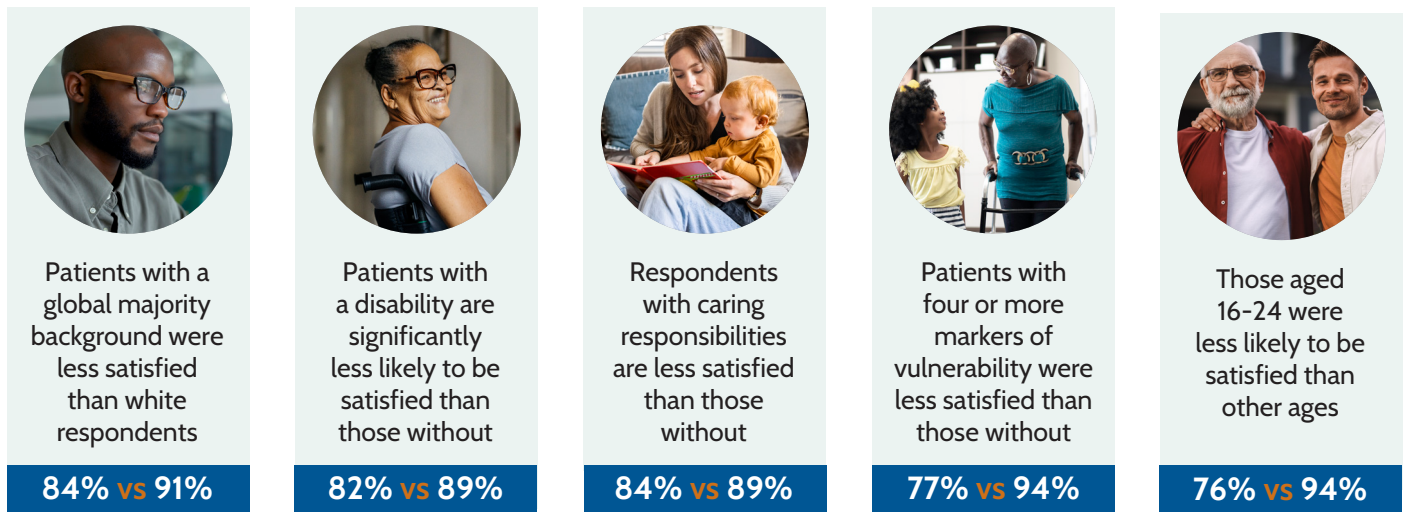
There is clearly more work for us to do in this space, and we have set an objective in our draft EDI Strategy about addressing negative workplace culture in regulatory practice that we hope will contribute to improvements. It is our responsibility as a regulator to use our levers to foster an inclusive and psychologically (as well as physically) safe environment for registrants, and we know that registrants are more engaged and provide better care when they feel safe.

Reducing barriers to good eye care

We are working with the wider optical sector to identify where more can be done to reduce barriers to access for marginalised patients. Not only does this lead to better eye care outcomes for marginalised patients but could also impact their wider healthcare outcomes.

Our mission, to protect the public by upholding high standards in the optical professions,

■ ANNUAL PUBLIC PERCEPTIONS SURVEY

Patients with a global majority background were less satisfied than white respondents	Patients with a disability are significantly less likely to be satisfied than those without	Respondents with caring responsibilities are less satisfied than those without	Patients with four or more markers of vulnerability were less satisfied than those without	Those aged 16-24 were less likely to be satisfied than other ages
84% vs 91%	**82% vs 89%**	**84% vs 89%**	**77% vs 94%**	**76% vs 94%**

means that we are deeply invested in understanding how the public experience eye care. One of the ways we monitor experience of and access to eye care is through our annual public perceptions survey. This measures respondents' levels of satisfaction with optical services they have accessed, looks at where there are issues accessing eye care, and investigates where EDI elements interact with these experiences.

Of those who responded to the survey, 92% were satisfied with the optometrist who carried out their sight test/eye examination, and 88% were satisfied with their overall visit. However, our findings showed that access to the sight test is not equal, and that there is a distinct difference in satisfaction levels between respondents from the global majority, those with a disability, those with caring responsibilities, and those with vulnerability markers compared to patients who weren't from marginalised backgrounds. Vulnerability is not limited to protected characteristics in equalities legislation, but also includes things like personal circumstances and someone's confidence in managing their own health. We therefore ask questions about 'vulnerability markers' and how these impact patient access to and experience of eye care, these include: financial (e.g. low income), going through a difficult life event (e.g. bereavement), having a disability, and/or low confidence in managing your own eye health.

Access to sight tests was also a reported issue

for a number of groups, including for those aged 25-34 – 7% of whom had never had a sight test compared to 4% overall – and those from a global majority background (6%). Patients with four of more markers of vulnerability were significantly less likely to have had their sight tested in the last two years compared to patients with no markers (63% vs 82%). Confidence levels in managing one's own eye health also varied, with respondents with a disability (16%), those going through a difficult set of life circumstances (16%), and those who are struggling financially (15%) reporting far below the overall confidence level of 84%. These findings are understandably concerning, and it will be important that we continue to monitor this data and continue to gather evidence surrounding this.

Improving our EDI data

We have redesigned our EDI monitoring template to improve the volume and quality of data we collect. Data is increasingly significant in identifying and monitoring progress and areas for improvement in EDI work. A particular success was the introduction of social mobility data. While not listed as a protected characteristic, social mobility is a growing area of interest within the field of EDI, and to meet our ambition of being a leader in the EDI space, we have proactively started collecting this data.

Socio-economic or class background has a huge influence on individuals' career prospects,

AN EXTERNAL REPORT ACKNOWLEDGED GOC PROGRESS IN EDI SINCE 2019

and even more so when you consider the intersection with other marginalisations like gender and race. Only 18% of Senior Civil Servants are from a work-class or lower socio-economic background, compared to 43% of those in the most junior grades . For us to understand the composition of our registrants and employees, members, and workers, we need to have the data to support this, and we hope that by undertaking this project it will open up the possibility of identifying trends, understand what is causing them, and explore ways to address them.

Work on how we use our EDI data most effectively, encourage increased responses, and improve intersectional analysis will continue into 2024-25.

An accurate picture of internal EDI to enhance outcomes

An outside perspective can lead to valuable insights and provide the opportunity for learning beyond what can be explored with internal measures. To ensure we have the fullest and most accurate picture of our internal culture, we commissioned an external consultant, Derek Hooper, to undertake a review with a particular focus on EDI in the winter of 2023. His previous review in 2019 led to several changes at the GOC, including the introduction of the EDI Manager position and the development of our staff networks, and we were keen to identify other areas of progress with this additional review.

The report acknowledged GOC progress in EDI since 2019, particularly highlighting the Council Associates scheme, the EDI manager post, the work of the staff networks, and the commendation by the PSA about our commitment to EDI. It also noted that "the GOC has the potential to set the standard on EDI for other regulatory services," and this is something we are eager to take forward. It also made several recommendations for developing our existing EDI work and opportunities for improvement.

To continue working towards becoming a regulatory leader in terms of EDI, we developed an EDI action plan for 2024-2025 to monitor progress and support the transition between our EDI Strategy 2025-2030 and the previous Fit for the Future strategy 2020-2025. The action plan was approved by Council and our progress will be monitored by our Senior Management Team and reported to Council. Included in the plan is the commitment to launch an Unfair Outcomes Working Group to establish whether there are potential unfair outcomes in fitness to practise processes and in differential attainment for students. We are also seeking to develop our employees, members and workers' understanding of structural discrimination and support our staff networks in continuing to raise awareness and support employees.

Changing the landscape for the better

Our emerging understanding of the current EDI landscape shows that there is still much work we can do to help achieve a fair and equal society. We are ambitious about the changes we can make, as we consider the journey towards our objectives to be as important as the outcomes. We have made great progress in improving our internal EDI landscape over the last twelve months, as well as seeking to do the same for our members and registrants.

Supporting blind and partially sighted employees

This year we launched our internship scheme as part of the Get Set Progress programme run by the Thomas Pocklington Trust, a charity which supports blind and partially sighted people into employment. The intention of the scheme is for interns to gain increased confidence and familiarity with the professional working environment, so that they may become better equipped to access employment after the internship ends. As a host organisation, the GOC will also benefit from gaining confidence in having future employees who are blind or partially sighted, and can work to empower them and other disabled colleagues to reach their full potential.

Our intern is based in the Governance team and supports the People & Culture and Facilities teams as an administrative

THIS YEAR WE REMOVED GENDER FROM OUR PUBLIC REGISTER,

assistant. They are also provided with regular opportunities to explore their career goals and gain experience across the GOC.

"The joint GOC and Thomas Pocklington Trust internship has allowed me to develop skills and knowledge in a range of areas. GOC colleagues have shown empathy and a genuine desire to help me explore possible career opportunities by offering advice and guidance based on their own career journeys. My manager adopts a growth focused approach and has been an ideal mentor, providing opportunities and projects which allow me to demonstrate and develop my skills. They are keen to help me grow with regular feedback which has proven invaluable."

- Sam Adam, TPT Intern

Preventing gender discrimination

This year we removed gender from our public register, which will support inclusion of trans and non-binary registrants and potentially prevent discrimination against female registrants. While we will continue to record registrants' gender, and other protected characteristics, to ensure effective monitoring of EDI trends and impacts, gender will no longer be the matter of public record.

We held a public consultation from September to December 2023 on a draft policy and impact assessment regarding removing gender from the register. The findings of this consultation are published on our website. Our consultation process and impact assessments determined that we should remove gender from the register, as this information is not needed and we are not required to publish this information on our register. The PSA also confirmed it supports a pared down approach when publishing registrant information. The consultation found that removing gender from the register would not have a significant detrimental impact to any groups, but would potentially protect trans, non-binary, and female registrants from discrimination. This puts us in line with current thinking about inclusion and data use.

Diversifying our Council

Our Council Associate scheme is its third successful year. This scheme is for early-career registrants who have an interest in pursuing a regulatory, governance or senior leadership role in the sector. Our Council Associates attend Council and committee meetings and are supported to gain experience in our decision-making as a non-executive participant. The scheme aims to increase the diversity of experiences and perspectives on our Council, while providing registrants with the first step towards a board, committee or panel role. Our current Council Associates are:

- Jamie Douglas (appointed 2023-2025)
- Deepali Modha (appointed 2023-2025)
- Rupa Patel (appointed 2024-2026)
- Desislava Pirkova (appointed 2024-2026)

"I joined the GOC as a Council Associate in April 2023, and I have been made to feel welcomed from the start. I was assigned a 'Council buddy' who has helped me greatly, especially in the beginning of my journey, to understand the various aspects of the GOC, and to help navigate and understand the papers that are prepared. I have been encouraged and supported to contribute during discussions in meetings, and I have seen first-hand that input and contributions from all colleagues at the GOC has been considered, respected and valued when making collective decisions. The Council Associate programme has given me an opportunity to learn and share during discussions in a safe space and has helped me feel confident when sharing my views. The GOC is always looking for ways to improve and innovate, and the GOC Council Associate programme is fundamental to that."

– Deepali Modha, Council Associate 2023-2025

Ensuring Welsh language inclusion

To support the inclusion of the Welsh language, we have made huge changes within the GOC

WE ARE INCLUSIVE OF WELSH LANGUAGE SPEAKERS

to facilitate its use and promote opportunities to use it. The GOC website (including our consultation platform) is now available in Welsh, as is our automated phone system, and we have translated over 160 documents into Welsh to ensure fair access. All-staff training on the history and culture of the Welsh language, the Welsh Language Standards (WLS), and our responsibilities for ensuring we meet the Standards has been delivered. This training is now included in the EDI induction process for new joiners. Our EDI Manager, who leads on work relating to the WLS attends a monthly meeting with other regulators to support and advise one another on continuing to make progress in improving Welsh inclusion.

"Optometry Wales is very grateful to the GOC for publishing the GOC strategy in the Welsh Language. This supports registrants and patients to use the Welsh Language as per the policy of the Welsh Government and offers choice which is appreciated."

- Optometry Wales

A significant project of work over the last year has been ensuring compliance with the Welsh Language Standards, to ensure we are inclusive of Welsh language speakers and reduce barriers to our services for those who use Welsh as a main language. which we have been required to meet since the implementation deadline of 6 December 2023.

Following the approval of a new set of Welsh Language Standards regulations for healthcare regulators, brought in by Senedd Cymru in July 2022, the GOC was issued with a compliance notice in June 2023. This required us to ensure that our services, especially those relating to registration and public protection, are accessible to Welsh language users.

Supporting a healthy landscape

EDI should never be a tick box exercise, and it is not enough to list our previous achievements. The GOC's work towards equity, improved diversity, and inclusion, is and should be a journey rather than a destination. We are committed to continuing to sustain the changes we have made over the last twelve months and to supporting ongoing work that contributes to a positive EDI culture at the GOC.

Protecting marginalised groups in eye care

We are currently reviewing the standards that we set for our registrants. We have proposed several changes to our standards that will positively impact registrants from marginalised backgrounds, including revisions regarding bullying and harassment, sexual misconduct, and practising while having a serious communicable disease. Additions specifically regarding vulnerable individuals and their care have also been proposed and will have a positive impact on those patients and service users who, due to their personal circumstances, need special care, support or protection and/or are at risk of abuse or neglect.

These proposals came out of a review of our standards of practice for optometrists and dispensing opticians and standards for optical students. Our engagement began with a series

STAFF NETWORKS PROVIDE A SAFE SPACE FOR SHARING EXPERIENCES

of 'conversations' with stakeholders between May and July 2023 and we also carried out a 12-week consultation on our proposals, which closed in May 2024 on our proposals. We expect to publish revised standards by the end of 2024.

All of the proposed changes have been reviewed through an EDI lens and an Equality Impact Assessment was undertaken to ensure that none of the revisions would have a negative impact on any marginalised groups and that the language used was accessible.

Engaging our staff in EDI

We are very proud of our staff networks and our recent EDI review by Derek Hooper acknowledged their importance and the impact they have on improving staff welfare and engagement at the GOC. The groups were developed by communities of employees who share a protected characteristic or who have chosen to champion a marginalised identity, and two additional networks have been founded in the last year – a social mobility group and a charity initiative group focused on staff volunteering.

Staff networks provide a safe space for sharing experiences, providing peer support, and generating ideas for improving the lived experience of marginalised employees at the GOC. They also raise awareness through events and intranet articles, and provide the opportunity for networking and socialising with colleagues. All networks have an SMT sponsor and agreed terms of reference but ultimately their leadership and activities are determined by their own members.

Our current staff networks are:

- ABLE (Disability)
- Anti-Racism Group
- Charity Initiative (Staff volunteering)
- EMBRACE (Global majority)
- LGBTQ+
- Social Mobility
- Staff Wellbeing and Engagement Group (SWEG)
- Women (Gender equality)

In 2023-24 the networks led several activities including:

Awareness raising
EMBRACE organised a speaker on colourism and held sessions during Black History Month. The Charity Initiative invited representatives from the Brain Tumour Charity to speak about the charity and its work. The Anti-Racism Group and EMBRACE brought in a speaker to discuss racism against Gypsy, Roma and Traveller people, especially in relation to healthcare and sharing what we might be able to do to support addressing this discrimination in the optical sector.

Discussion
Women held several sessions during Women's History Month, including a discussion on the possibility of introducing mentoring for women at the GOC. ABLE hosted a session on disability allyship for Disability History Month and the LGBTQ+ network held a Q&A session on how to be a good trans ally.

Networking
Several initiatives were run by the networks to support the development of working relationships and improve engagement across the GOC. The Women's Network held a pizza party on International Women's Day, and SWEG organised a winter Festive Chillout event and a Spring Festivals Celebration.

Wellbeing
Regularly wellbeing initiatives are organised by SWEG, including weekly yoga classes and the Winter Wellbeing campaign.

"The Anti-Racism Group (ARG) is a collaborative, co-led, group that seeks to champion and promote anti-racism by ensuring that the GOC continues the conversation and works to embed anti-racism into all aspects of the organisation. We do this by holding events, discussions, and a space for all to better understand each other's differences.

Towards the end of 2023, we were fortunate to host an amazing event that promoted awareness and understanding of the Travellers Community - often considered a marginalised community and generally unfairly portrayed due to negative

ALL OF OUR STAFF ATTEND AN EDI INDUCTION

stereotypes. We were joined by James O'Neill, an Educator and Trainer for the Friends Family and Travellers organisation, the largest charity in the UK that deals with racism and discrimination against Gypsies, Travellers and Roma, where he delivered a fantastic presentation about their experiences in everyday life and with the barriers they face in accessing healthcare.

The presentation was extremely well received and we are thankful that the event gave us the opportunity to learn more about Travellers as well as giving us a great insight into how we, as a healthcare regulator, can better improve our understanding and relationship with them.

We followed this up with our celebration of the upcoming Olympics 2024, where we kickstarted our sports theme with a presentation on 'Diversity Within Winter Sports'. We were joined by Tom Robertson, the former Director of Snowsports England Ski and Snowboarding. He delivered a brilliant presentation on the awareness that the Winter Sports Bodies across the UK have, regarding the need for ethnic participation in the sport as well as the challenges faced by the Bodies in encouraging the participation due to cultural, religious and socio-economic differences that are prevalent within urban communities.

As Co-Chair, I am so proud of the development of the group and I look forward to the coming year where we can hopefully host more events like these.

– Nkiruka Umeh, Chair of Anti-Racist Network

Enabling development and fostering connection

Proactive communication is an essential element of raising awareness and supporting understanding on EDI, both amongst our people, and with our stakeholders. We hold an annual engagement calendar for EDI and wellbeing, and run training to ensure all our employees, members and workers feel confident in their understanding and management of EDI.

This year we marked several heritage events including Black History Month, Disability History Month, LGBTQ+ History Month, and Women's History Month, and participated in awareness raising for Migraine Awareness Week, International Guide Dogs Day, and Bisexuality Awareness Day. We have also published internal guidance on being equitable and inclusive, including articles on supporting colleagues during Ramadan, sharing tools about emotional wellbeing for World Mental Health Day, and an FAQ about being inclusive of the Welsh language

All of our staff attend an EDI induction when they join the GOC, and are required to do annual training on EDI, as a baseline. In the last 12 months, all employees were required to attend training on the Welsh language and how the Welsh Language Standards will influence their work. This training is covered in EDI inductions for all new joiners. We also commission external training to ensure our people are fully conversant in EDI matters and feel confident in their responsibilities around EDI. The Thomas Pocklington Trust (TPT) provided Sight Awareness training for colleagues working directly with our TPT intern and a recording of this was disseminated to all employees at the GOC to ensure good practice when working with colleagues with sight loss. We have also commissioned training on structural discrimination for all managers from the Employer's Network for Equality and Inclusion (enei) that will be delivered in June 2024. Our EDI Manager also attended training on Reasonable Adjustments with the Advisory, Conciliation and Arbitration Service (Acas) that will be used to train all managers in summer 2024.

Our EDI Manager works with colleagues across the regulatory and charity sector to share learning and discuss issues relating to EDI. This has included delivering training on gender identity and trans inclusion.

Addressing the gender pay gap

Since our previous EDI report, our pay gaps for employees based on gender have reduced and

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GENDER PAY GAP

	% difference in hourly rate (mean)	% difference in hourly rate (median)
GOC 2023-24	-4.1	-2.6
National average	13.2	14.3
Regulatory average	10.2	12.2
GOC 2022-23	4.5	0.6

GENDER PAY GRADES

	% difference in hourly rate (mean)	% difference in hourly rate (median)
Head of	3.3	2.3
Manager	4.2	2.9
Officer	1.1	0.0
Administrator	-11.2	-11.3

female employees now appear to be paid more on average than their male colleagues. As part of our commitment to ensuring equity within the GOC, we produce an annual gender pay gap report. While we have no legal or statutory duty to publish this kind of report, we choose to do so to ensure that we are aware of any inequality within our own organisation and can then take steps to address this.

This report is based on our internal monitoring data, captured on 31 March 2024, and only includes data where employees have provided information about their sex. As a result, we have analysed the data for 87 of our 101 employees at the time of recording.

Compared to the national average, the regulatory sector average, and last year's GOC average, the GOC gender pay gap for 2023-24 was much improved. We have moved to being in a position where our female employees are paid more on average than their male colleagues, in terms of both mean and median hourly rate.

When looking at mean hourly pay broken down by grade, the picture is quite different. Any data above Head Of positions is removed to prevent data being identifiable, but in all remaining positions, the only one where female staff are paid more than their male colleagues is Administrator (-11.2%), the lowest grade. In the other grades (Officer, Manager, Head of)

men are still paid more than women, with the largest pay gap being at Manager grade (see table below). This suggests that, while our overall figures show an improvement in our pay gaps since last year there is still work to be done to ensure that gender pay gaps are reduced across all grades.

Exceeding our statutory duties

Our commitment is to do more than just comply with legal and statutory obligations; it is to go above and beyond, to follow best practice in all our EDI work, and provide thought leadership in this area. We are of course compliant with the Equality Act 2010 (the 'Act') - the legislation which protects people from discrimination, and it applies to all workplaces and public bodies. The Act outlaws discrimination based on nine protected characteristics, which are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief (including no religion)
- Sex
- Sexual orientation.

In addition to these characteristics, the GOC is also committed to ensuring equal access and opportunities for carers, those with markers of vulnerability, and those from less socially mobile backgrounds.

Section 149 of the Act sets out what is known as the Public Sector Equality Duty (PSED). Under the Act, we are treated as a public authority, and are bound by the PSED. This means, when we carry out our public functions, we must have 'due regard' to the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between people from different groups
- Foster good relations between people from different groups.

To have 'due regard' means that in making

WE REPORT PUBLICLY ON HOW WE COMPLY WITH OUR LEGAL DUTIES

decisions and carrying out our functions and day-to-day activities, we must consciously consider all three of the duties above. Whenever possible, our approach to demonstrating 'due regard' includes considering intersectionality between the protected characteristics.

The GOC carries a duty under the PSED to implement the Act. Specifically, to publish information to demonstrate GOC compliance with the Equality Duty, at least annually, and set equality objectives, at least every four years, which we set out in our EDI action plan. In order to demonstrate how we meet our legal obligations in this context, we report publicly on how we comply with our legal duties and ethical responsibilities, including (but not limited to) PSED, the PSA Standards for Good Regulation, the Act, and the Human Rights Act 1998, as follows:

- Written updates in the Chief Executive and Registrar's quarterly report to Council, published in the 'governance' section of our website

- Our gender-pay gap report, which is published annually

- This EDI annual report, which showcases our key achievements in our EDI work, and describes our EDI data, which we collect and publish annually

Our EDI Action Plan 2020-2024

Our EDI plan for the last four years has captured our core activities and committed us to work that supports our wider corporate strategy. A new action plan has been developed to cover the next year until the launch of our new strategy. The previous plan identified six areas of focus:

1 Data

Collecting data on our registrants, staff, Council and committee members can direct our actions and processes to ensure we progress equality. It is therefore important to collect the right type of data and analyse it to highlight areas of weakness. This will allow us to explore the reasons why certain groups are subjected to certain processes, what barriers are presented and the feeling of inclusion.

2 People development and education

It is important to develop a learning culture where shared learning is encouraged, giving a better understanding of EDI topics and how to make the GOC an equal and inclusive environment at all levels.

3 Recruitment

It is important that people who come into the organisation feel included, no matter their background, from the moment they apply to be part of the GOC. This stage in the employee lifecycle is an important chance to embed the GOC values and commitment to EDI.

4 Values setting

Embedding GOC values and commitment to EDI into every aspect of the GOC's work will allow staff to understand how their roles are connected to EDI and how they personally can contribute. This also embeds EDI into all practices in the GOC.

5 Community engagement and support

Building community is essential to creating a sense of belonging and forming trust, for mutual wellbeing support and having a place to discuss issues.

6 Leadership and accountability

Organisations with strong leadership on EDI are generally more successful, therefore it is important to have clear and practical definitions of EDI, which are shared and understood throughout the organisation, with a defined direction and plan of action, and an ease in talking about EDI issues in relation to the work of the GOC.

Our progress against this plan is outlined in Annex 1. While we have seen real successes in the last four years, the findings of the Derek Hooper EDI review prompted us to extend some of our objectives further and reprioritise certain aspects of others. These have been adapted into our 2024-2025 plan which was approved in March 2024.

Action plan 2024-2025

Our EDI action plan for 2020-2024 was approved by Council in March 2024. It describes how we will progress our critical activities around EDI, as well as recommendations arising from the Hooper Review and activity related to evidencing our achievement of PSA Standard 3. Our plan will enable us to closely track our progress against the actions outlined as we bridge into our 2025-2030 strategy.

The new action plan is organised under six themes, with areas of focus to allow us to meet our objectives for the next year. These themes are:

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

EDI Strategy 2025-2030

EDI is also central to our corporate strategy, as reflected in the drafts of our new vision statement, and our first strategic objective: Creating fairer and more inclusive eye care services. Our current 2020-2024 EDI strategy is included within the GOC's overarching Fit for the Future Strategy 2020-2025. From April 2025 we intend to publish separate EDI strategy to 2030 which will outline our ambitions for the next five years.

Measuring our progress

The following tables provide evidence of the GOC's progress against the actions in our EDI Action Plan 2020-2024

■ PEOPLE DEVELOPMENT AND EDUCATION

Programme of work	Strategic objective	Date	Progress
Roll out essential EDI training for all staff	Continuous improvement	Jan-Mar 2021	As reported in the EDI annual report 2023-2024, this action is complete
Develop and launch an enhanced management development programme	Continuous improvement	Apr-Jun 2021	This programme of work is included in our 2024-2025 action plan. Managers received training on structural discrimination in June 2024 and further training has been developed. A bespoke GOC style of management is being developed in consultation with GOC employees to support this development
Develop and launch a continuous EDI learning program, with embedded values, for staff	Continuous improvement	Jan–Mar 2023	As reported in the EDI annual report 2023-2024, this action is complete
Develop an EDI training program for Council	Continuous improvement	Apr-Sep 2022	This programme of work is included in our 2024-2025 action plan. Council receives EDI training and new members receive an EDI induction. Training on structural discrimination will also be extended to them
Develop informal EDI learning opportunities for registrants	Continuous improvement	Jan–Mar 2023	This programme of work is included in our 2024-2025 action plan
Adopt reverse mentoring to further develop leaders and people managers	Continuous improvement	Jan–Mar 2023	This programme of work is included in our 2024-2025 action plan

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■ DATA

Programme of work	Strategic objective	Date	Progress
Improve collection, analysis and recording of protected characteristics in its regularity, use and timeliness, to better inform policy, processes, and impact	Continuous improvement	Jan-Mar 2022	This programme of work is included in our 2024-2025 action plan. We are expanding the data we collect and will be redeveloping our monitoring forms to improve our volume and quality of evidence to better inform our policies and processes
Improve recording, analysis and sharing of fitness to practise data	Transforming customer service	Jan–Mar 2022	This programme of work is included in our 2024-2025 action plan. We will build on existing work in this area through our Un-fair Outcomes Working Group
Implement new data analysis programmes to explore intersectional data and remove barriers	Continuous improvement	Jan–Mar 2023	This programme of work is included in our 2024-2025 action plan.
Embed EDI benchmarking reporting into each quarter	Continuous improvement	Jan–Mar 2021	There is limited scope to introduce a numerical quarterly EDI benchmark, given the small sample size (for example, vari-ances in the EDI profile of staff on a quarterly basis would potentially identify individuals,) and that the data does not significantly change enough in-year to warrant quarterly reporting. The monitoring of systemic change associated with the GOC's EDI plans is better served by an annual data set, such as that contained in the EDI monitoring report. Further monitoring around the staff EDI profile at an operational level, includ-ing recruitment data, in-vestigations, grievances and other HR matters was incorporated into BAU reporting to SMT in 2023-24.
Create an inter-regulatory sharing space for learning and research that progress EDI, where there are limits to data use	Transforming customer service	Jan–Mar 2023	As reported in the EDI annual report 2023-2024, this action is complete.
Start collecting qualitative data to understand inclusion.	Continuous improvement	Jan–Mar 2023	As reported in the EDI annual report 2023-2024, this action is complete

■ RECRUITMENT AND RETENTION ■

Programme of work	Strategic objective	Date	Progress
Review recruitment policy, processes, and assessment, to embed EDI and values	Continuous improvement	Jan–Mar 2022	As reported in the EDI annual report 2023-2024, this action has been completed previously. However, as these reviews should be undertaken regularly, a similar objective has been incorporated into our 2024-2025 action plan
Analyse EDI data of recruitment campaigns to highlight and analyse inequality and barriers	Continuous improvement	Jan–Mar 2023	As reported in the EDI annual report 2023-2024, this action has been completed previously. However, as this analysis should be undertaken regularly, a similar objective has been incorporated into our 2024-2025 action plan
Review roles requirements to ensure the role descriptions are not limiting	Continuous improvement	Jan–Mar 2023	As reported in the EDI annual report 2023-2024, this action has been completed previously. However, as these reviews should be undertaken regularly, a similar objective has been incorporated into our 2024-2025 action plan

■ VALUES SETTING ■

Programme of work	Strategic objective	Date	Progress
Clarify the link between EDI and GOC values and embed those values into ways of working	Continuous improvement	Jan–Mar 2022	As reported in the EDI annual report 2023-2024, this action has been completed previously. The link between EDI and GOC values will also be highlighted in our 2025-2030 Strategy, as well as the 2025-2030 EDI Strategy
Redraft all HR policies and processes	Continuous improvement	Jan–Mar 2023	As reported in the EDI annual report 2023-2024, this action has been completed previously
Redesign processes to practise values	Continuous improvement	Jan–Mar 2023	As reported in the EDI annual report 2023-2024, this action has been completed
Build EQIAs into each process	Continuous improvement	Jan–Mar 2022	As reported in the EDI annual report 2023-2024, this action has been completed. A review of the EQIA process has been included in the action plan for 2024-2025

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■ COMMUNITY ENGAGEMENT AND SUPPORT

Programme of work	Strategic objective	Date	Progress
Review and promote a staff engagement plan where EDI dates are celebrated	Continuous improvement	Jan–Mar 2022	As reported in the EDI annual report 2023-2024, this action has been completed. This has become BAU work as part of the EDI Manager's role and the Staff Networks and will continue into 2024-2025
Review the staff network structures and support	Continuous improvement	Jan–Mar 2022	As reported in the EDI annual report 2023-2024, this action has been completed
Set up new, and develop existing structures to promote and reward cross-department / cross-team working	Continuous improvement	Jan–Mar 2023	As reported in the EDI annual report 2023-2024, this action has been completed
Develop and implement a people plan	Continuous improvement	Jan–Mar 2023	As reported in the EDI annual report 2023-2024, this action has been completed
Develop and implement a revised communications strategy to engage staff	Continuous improvement	Jan–Mar 2022	As reported in the EDI annual report 2023-2024, this action has been completed. This has become BAU work as part of the EDI Manager's role and will continue into 2024-2025

■ LEADERSHIP AND ACCOUNTABILITY

Programme of work	Strategic objective	Date	Progress
Develop guidance on 'speaking up' for staff and registrants	World-class regulatory practice	Jan–Mar 2021	As reported in the EDI annual report 2023-2024, this action has been completed
Publish and implement guidance on 'speaking up' for registrants	World-class regulatory practice	Jan–Mar 2022	As reported in the EDI annual report 2023-2024, this action has been completed
Monitor the re-vised communications strategy to achieve greater transparency	Transforming customer service	Apr–Jun 2023	As reported in the EDI annual report 2023-2024, this action has been completed