



PSA – Regulators' performance in equality, diversity and inclusion

About us

FODO – The Association for Eye Care Providers is the leading national association for eye care providers working in primary and community care settings. Each year our members provide over 18 million eye examinations and offer a wide range of other eye care services across the UK.

Our response

1.Full name

Alan Tinger

2.Organisation

FODO -The Association for Eyecare Providers

3.Which regulator(s) does your organisation interact with?

- ☐ GCC
- ☐ GDC
- ☐ GMC
- ☒ GOC
- ☐ GOsC
- ☐ GPhC
- ☐ HCPC
- ☐ NMC
- ☐ PSNI
- ☐ SWE
- ☐ None

4.Choose the five areas of regulators' EDI work you consider most important

We believe that all these areas are important. However, we want to understand which areas stakeholders think the regulators must prioritise

The regulator: Please select at most 5 options.

- ☒ Collects and analyses EDI data
- ☐ Produces Equality Impact Assessments before introducing a new policy or changing an existing policy
- ☒ Ensures staff, senior leadership and fitness to practise partners receive regular EDI training
- ☐ Considers EDI in recruitment process

- ☐ Engages with staff, for example, by having staff networks for particular shared protected characteristics
- ☒ Works to address disproportionality in fitness to practise processes, from referrals to outcomes at hearings
- ☒ Works to address disproportionality in other areas, for example, education and training
- ☒ Takes steps to improve the accessibility of its processes, such as the support in place for vulnerable witnesses, the ease of making a complaint, and the accessibility of the website
- ☐ Engages with stakeholders representing groups which share particular protected characteristics
- ☐ Regularly considers EDI in policy projects

5. Choose the three groups you consider it most important for regulators to collect and analyse EDI data about

Please select at most 3 options.

- ☒ Their registrants
- ☒ Fitness to Practise partners - i.e. panel members
- ☐ Council/Board members
- ☐ Staff
- ☐ Patients and service users
- ☒ Complainants

6. Is there any data you think regulators should collect about their registrants, beyond the protected characteristics under the Equality Act or groups listed under Section 75 of the Northern Ireland Act?

Protected characteristics under the Equality Act are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation

The groups listed under Section 75 of the Northern Ireland Act are religious belief, political opinion, gender, race, disability, age, marital status, dependants and sexual orientation

7. If a regulator is making significant efforts to reduce barriers or unequal outcomes in its processes, but with limited evidence of success, should that be sufficient to meet the Standard, or should evidence of a reduction in barriers or unequal outcomes be necessary?

- ☐ Evidence that a regulator has made significant efforts to reduce barriers or unequal outcomes is sufficient to meet the Standard
- ☒ Evidence that a regulator has succeeded in reducing barriers or unequal outcomes is necessary to meet the Standard

8. How long do you think regulators should have to reduce identified barriers or unequal outcomes in its processes?

- ☐ Immediately
- ☐ One to two years
- ☒ Two to three years
- ☐ More than three years

9.Should we consider the internal culture of a regulator in our assessment against this Standard?

☒ Yes

☐ No

10.Are there specific indicators of internal culture you think we should consider?

Transparency on how decisions are made.

HR advertising, process and recruitment outcomes, internal grievances where EDI issues are present.

11.Is there anything else you would like to tell us?

The GOC take EDI extremely seriously in its public protection and fitness to practise (FtP) roles and as an employer and sector leader. It is to be congratulated on its efforts and progress made so far, including on raising awareness in all areas and in investigating FtP patterns. However, despite this and possibly because of the skills sets and experience required, it is still overwhelmingly a 'white' middle-class organisation in its Council and most of its senior roles. It may be that, with all regulators, more has to be done to recruit and nurture diversity of talent from within. The GOC is leading the way here through its programme of Council associates.