



GOC consultation - Updating gender on register

1. What is your name?

[Daniel Hodgson](#)

2. What is your email address?

Daniel.hodgson@fodo.com

3. Are you responding on behalf of an organisation?

☒ Yes

☐ No

If yes, specify name of organisation

[FODO - The Association for Eye Care Providers](#)

4. Which category best describes you or your organisation?

- ☐ Member of the public
- ☐ Optical patient
- ☐ Optometrist
- ☐ Dispensing optician
- ☐ Therapeutic prescribing optometrist
- ☐ Contact lens optician
- ☐ Student optometrist
- ☐ Student dispensing optician
- ☐ Business registrant / employer
- ☐ CPD provider
- ☐ Education provider
- ☐ Patient representative charity/organisation
- ☒ Optical professional/representative body
- ☐ Government department
- ☐ Commissioning body
- ☐ Other

If other, please specify

Policy and process

5. To what extent do you agree with the content of the policy?

- ☐ Strongly agree
- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

If you answered 'disagree' or 'strongly disagree', please explain your reasons.

6. Is there anything unclear or missing in the policy?

- ☒ Yes
- ☐ No
- ☐ Not sure

If you answered 'yes', please give details.

While not necessarily part of the registration process, there may be aspects that require further explanation. For example, registrants accrue CPD points over a three-year period. Where a change of gender on the register occurs within that period and CPD points have already been accrued, we would like assurance that either the accrued points will be transferred to the record with the updated gender, or that for the remainder of the three-year period the CPD requirement is pro-rata'd, in line with what they have already registered.

The policy and process does not include a target timeline for updating the register once an application has been submitted. We would like assurance that, as a minimum, changes will be made in line with the normal standard for other updates to the register. Where a delay to updating the register might impact an individual's personal or professional life, we would like assurance that updating the register will be expedited.

The application form included at Annex 2 suggests 'both paper and photocard parts' of a driving licence would be required (if a driving licence were the chosen evidence), however the paper part of a licence is no longer issued, nor is it a statutory requirement to hold a paper licence if a photocard licence is held. The form should be updated to suggest photocard or paper part (if the latter is the only part held).

7. Are there any aspects of the policy that could discriminate against stakeholders with specific characteristics? (Please consider age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, gender identity, gender expression, pregnancy or maternity, caring responsibilities or any other characteristics.)

- ☒ Yes
- ☐ No

☐ Not sure

If you answered 'yes', please give details.

The requirement for a new GOC registration number (and indeed a whole new record) to be allocated for a change of gender could potentially be discriminatory, if not required for other similar updates to the register (eg change of name on marriage or by deed poll). It could also cause discomfort if the registrant has to disclose to a new employer or others why their registration number has changed (for example where an individual is already living under a gender identity that is different from their GOC registered gender), and it could have a financial or other impact if that individual uses their registration number as part of marketing or other materials (eg business cards).

Others, however, might wish to receive a new GOC registration number as part of their change of gender identity. Therefore, we believe as part of the application to change gender on the GOC register, applicants should be able to choose whether to receive a new number (and indeed a new record) or retain their existing one.

8. Are there any aspects of the policy that could have a positive impact on stakeholders with specific characteristics? (Please consider age, sex, race, religion or belief, disability, sexual orientation, gender reassignment, gender identity, gender expression, pregnancy or maternity, caring responsibilities or any other characteristics.)

☒ Yes

☐ No

☐ Not sure

If you answered 'yes', please give details.

It is not clear what the options are for a registrant who is transitioning but has not yet fully completed the process, for example someone who is already living and working in their chosen gender identity but who has not yet formally changed their birth certificate, driving licence, passport etc.

9. Are there any other impacts (including financial) of the policy that you would like to tell us about?

☐ Yes

☒ No

☐ Not sure

If you answered 'yes', please give details.

Equality, diversity and inclusion

We welcome consultation responses from everyone, regardless of their background. We don't want anybody to miss out or be disadvantaged because of the way we work and we try hard to make sure this doesn't happen. The following questions help us to understand who we are reaching with our surveys, so that we can make sure that everybody has the opportunity to get involved.

You do not have to answer these questions (just click 'continue' at the bottom of this page if you don't want to) but we would be grateful if you did. Your answers to these questions will be treated as confidential and held securely in line with data protection requirements. They will not be considered or published alongside your name or anything else that might identify you.

For more information about how we use information like this across the General Optical Council, please visit the equality, diversity and inclusion section of our website.

If you are responding on behalf of an organisation, please do not respond to these questions. [removed Q10-Q19]

Consent to publish your response

If you select 'yes', this option will allow us to use quotations from your response alongside you or your organisation's name.

If you select 'yes, but please keep my name and my organisation's name private', this option will allow us to use quotations from your response but we will not use your or your organisation's name.

If you selected 'No', this option will allow us to take your response into account as part of our analysis but we will not be able to use quotations from your response.

20. Can we publish your response?

☒ Yes

☐ Yes, but please keep my name and my organisation's name private

☐ No