



## **Response to the General Optical Council Consultation on Equality & Diversity Monitoring**

30 June, 2008

Thank you for the opportunity to comment on the GOC's proposals for the introduction of a scheme to collect and monitor equality and diversity data about registrants.

Together the Federation of Ophthalmic & Dispensing Opticians (FODO) and the Association of British Dispensing Opticians (ABDO) represent over three quarters of companies and the 5,000 dispensing opticians who provide high quality and accessible eye care services in the UK.

We assume this monitoring covers individual practitioner registrants only.

### **Consultation questions**

#### **Principles**

##### Principle 1

We agree that a high response rate is desirable.

We agree that the form should be issued with the registration retention documents with a pre-paid envelope for separate return (see Principle 2).

We strongly suggest that the form should be anonymous (see Principle 2).

We believe that completing and returning the form should be optional as registrants may have ethical objections to completion which have nothing to do with their fitness to practise and which should be respected.

## Principle 2

We agree that data should be accurate and up to date.

An annual collection of data at the point of registration renewal would allow the GOC to maintain accurate and contemporary data.

It should be noted that many organisations choose (as a matter of good practice) or are required to collect data on the gender and ethnic background of candidates, employees, etc. This is almost always on a form which contains no identifiers. We would strongly urge the GOC to follow this common practice and remove any identifiers from the form. The form should be anonymous and should be returned separately in a pre-paid envelope ensuring anonymity. There should be no circumstance in which the GOC would be asked to provide data on equality and diversity which requires identification or cross-reference with a registrant's records. The form may have to be altered to include date of birth, etc. if that information were required.

We agree with the AOP that this data should be stored on a separate database which is not used for any other purpose (though not against the registrant's GOC number as this would be, of course, an identifier).

We do not think a requirement to complete an anonymous equality and diversity form at the time of a fitness to practise investigation would cause undue anxiety, if the registrant were assured that the data would be kept anonymous and would not be seen by the FTP panel.

## Principle 3

We agree that individuals' data should not be made public. A system of anonymous collection and processing would ensure this.

## Principle 4

We agree with this principle.

## Principle 5

Where possible the information collected should mirror that collected by other regulators of health care professionals, to allow for meaningful statistical comparisons. We would suggest an early comparison of drafts be undertaken in order that information requested is identical / compatible, providing that the principle of anonymity is not breached.

We agree that shared data should always be anonymised.

## **Recommendations**

### Recommendation 1

We think that completion of the monitoring form should be optional (see above).

We agree that it should be included with the individual registration, retention and restoration forms.

### Recommendation 2

To ensure anonymity, data should not be stored against an individual's record or on a separate database which includes identifiers.

### Recommendation 3

We agree.

### Recommendation 4

We agree.

### Recommendation 5

We agree (see Principle 5 above). Where this would mean a substantive change to the content of the form, stakeholders should be consulted.

## **Comments on the draft Monitoring Form**

We suggest that the introductory paragraph should include:

- an explanation for the reason for collecting the data
- an assurance of anonymity
- information on data storage and access
- an explanation of how the data will be used.

We strongly suggest removing the 'your name' , 'GOC number' and 'Agreement / signature' fields (see above).