Code of conduct for members

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2	Chief of Staff	24 June 2026	Substantial revision to v1

1. Purpose

1.1 The purpose of this policy is to set out the standards of conduct required of our Council and committee members. The policy is structured as follows:

- Scope: who this policy applies to;
- Legal obligations: the statutory powers and duties conferred to members, and the relevant legislation for different GOC roles
- General obligations: those obligations that apply to all members, regardless of role.
- Specific obligations: where the obligations include a more explicit or different requirement because of the role.
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1.2 This code of conduct will assist our members in understanding the ethical and cultural principles we embody as an organisation, and the behaviours we expect when they work on our behalf. It will also assist the public, registrants, employees and workers to know what they can expect from our members. Setting ourselves a high standard for ethical conduct in public life is a critical part of how we discharge our responsibilities as a regulator and charity with confidence.

2. Scope

2.1 This policy applies to anyone who has been appointed by the GOC to undertake a role as a member of a committee or panel, and to those who have been appointed by the Privy Council as a member of Council.

2.2 This policy does not extend to others working on behalf of the GOC (for example, employees). A separate group of policies apply in such circumstances, though the GOC will align such documents to reflect our organisational values and shared principles where appropriate.

2.3 Individuals will be advised of which policies apply at the time they are appointed by the GOC. Members are expected to be familiar with both the general responsibilities outlined in the code, and those that apply to their specific role.

2.4 A principle of proportionality will be applied when assessing potential breaches of the code of conduct. The broad aim of the proportionality principle in the context of the code of conduct is to ensure that the code does not have a greater effect on the personal lives of members than is reasonably necessary to protect the interests and reputation of GOC.

2.5 To that end, the GOC expects members to avoid taking any action that would be liable to undermine public confidence in the regulation of registrants. This code of conduct therefore applies to all professional and personal conduct, where such conduct would be liable to undermine public confidence in the regulation of registrants. This applies regardless of whether the member was actively undertaking work on behalf of the GOC at the time.

2.6 This code of conduct should not be considered an exhaustive statement of the kinds of conduct which may result in the Council considering a breach of this code of conduct.

3. Legal obligations

3.1 There are several provisions within legislation by which a member might be disqualified, suspended or removed from office. The GOC expects members to familiarise themselves with these conditions and take all reasonable steps to inform the Chief of Staff without delay if they believe these conditions apply or are likely to apply.

3.2 The statutory obligations apply as follows to the following groups:

Role	Statutory provisions regarding disqualification, suspension or removal
Council member	The General Optical Council (Constitution) Order 2009
Statutory Committee member (members appointed to Advisory Panel and one of its statutory committees)	The General Optical Council Committee Constitution Rules 2005 (Part 1A)
Hearings Panel member	The General Optical Council Committee Constitution Rules 2005 (Rule 28)

3.3 The legislation that is specific to the GOC is published on its website here. In addition, the GOC is registered as a charity in England and Wales, and must comply with charity law.

3.4 As trustees of the charity, Council members have specific legal duties, including under the Charities Act 2011 and the Trustee Act 2000. Charity Commission guidance describes the six main duties of charity trustees as follows:

- Ensure your charity is carrying out its purposes for the public benefit;
- Comply with your charity's governing document and the law;
- Act in your charity's best interests;
- Ensure your charity is accountable;
- Act with reasonable care and skill; and
- Manage your charity's resources responsibly.

3.5 The Professional Standards Authority for Health and Social Care (PSA) is the independent regulatory oversight body for regulators of health and care practitioners. It fulfils this role by reviewing and monitoring performance, producing guidance, sharing knowledge and expertise. All GOC members are expected to comply with the guidance issued by the PSA relevant to their respective roles. The executive will support members by providing education

and training on this guidance and how it is reinforced by GOC policies and processes.

3.6 Registrant members are defined as those registered with the GOC in one of the professions we regulate. All registrants are expected to uphold the standards required of them by the GOC. The statutory provisions provide further detail in relation to fitness to practise matters and how these could be considered grounds for disqualification, suspension or removal as a member.

3.7 In addition, if an individual (either a registrant or lay member) works in a regulated profession, there is an expectation that they will act in accordance with the standards and regulations that apply to their profession. They must fulfil any legal duty as required under the terms of their registration with a regulated body. Failure to do so could be considered grounds for disqualification, suspension or removal as a member.

3.8 If the individual has been recruited for a role which includes a specific requirement to hold a professional or regulated status, then this must be maintained for the duration of their term of office.

4. General responsibilities

Principles of public life and GOC values

4.1 All members of the GOC are expected to maintain high standards of integrity, probity and ethical conduct in their professional and personal lives. Members must act in accordance with the seven principles of public life:

Selflessness: Holders of public office should act solely in terms of the public interest.

Integrity: Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

Objectivity: Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability: Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness: Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty: Holders of public office should be truthful.

Leadership: Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.

4.2 In addition to this, members are also required to act in accordance with the values of the GOC, namely:

- We act with integrity
- We pursue excellence
- We respect other people and ideas
- We show empathy
- We behave fairly
- We are agile and responsive to change.

4.3 The GOC will produce policies and procedures that support members in meeting these obligations. Key relevant policies include, but are not limited to:

- Anti-fraud policy
- Expenses policy
- Financial regulations and scheme of delegation
- Freedom to speak up policy for members, employees and workers
- Gifts and hospitality policy
- Information Governance framework
- Management of interests policy
- Member appointment policy
- Member fee policy
- Member review policy
- Safeguarding policy
- Social media policy (to follow)

4.4 The relevant policies will be published on the GOC website and shared with members regularly, including at the appointment stage.

4.5 Evidence of a failure to comply with these policies will constitute a breach of the code of conduct. Failure to reflect the GOC values or the principles of public life will constitute a breach of the code of conduct, where such conduct would be liable to undermine public confidence in the regulation of registrants.

Equality, Diversity and Inclusion (EDI)

4.6 The GOC has published an equality, diversity and inclusion (EDI) strategy for 2025-30 which summarises our key commitments, and describes the following objectives:

- Be active in addressing inequality and preventing discrimination
- Promote and reflect diversity
- Foster inclusivity and accessibility
- Build a culture of confidence in EDI

4.7 Promoting equality, reducing inequalities and addressing discrimination are essential components of who we are as an organisation. Throughout the development of this policy and the processes that support it, we have:

- Given due regard to the need to eliminate discrimination, harassment and victimisation, to advance equality of opportunity, and to foster good relations between people who share a relevant protected characteristic (as cited under the Equality Act 2010) and those who do not share it; and
- Given regard to the need to reduce inequalities, bias and unfair outcomes.

4.8 All members have an obligation to promote equality, reduce inequalities and address discrimination. There is an expectation that members will support the commitments set out in the GOC EDI strategy and take personal responsibility for promoting it in their roles.

4.9 The GOC expects all members to meet this obligation by:

- familiarising themselves with the EDI strategy, EDI policy and the GOC's anti-racism statement;
- attending education and training, and having due regard for any advice and guidance provided to assist members in fulfilling their responsibilities;
- engaging with the GOC's support to ensure members can consider inclusive behaviours, reducing bias and upholding dignity in discussions and decision-making;
- actively supporting the GOC in its work to remove barriers to EDI, including making reasonable adjustments where recommended; and
- speaking up when you feel we have not met our EDI commitments as an organisation

4.10 Evidence that a member has failed to meet their obligations in respect to EDI, or interfered in the GOC's duties in this respect, will be considered a breach of the code of conduct.

Attendance and participation at meetings

4.11 All members have an obligation to engage fully in respect to their specific roles; this includes taking the time to prepare for and attend meetings. This is to ensure that the GOC can effectively discharge its statutory functions as a charity and regulator. The GOC will consider any necessary reasonable

adjustments for members with disabilities or long-term conditions to support attendance and participation.

4.12 Repeated failure to attend meetings is likely to be considered a conduct issue, unless the individual has given reasonable grounds for non-attendance.

4.13 Where necessary, the Chief of Staff can agree a temporary leave of absence for up to twelve months. Longer leaves of absence will require a decision by Council (for Council members) or Nominations Committee (for all other members). Council members who fail to attend three consecutive sessions of Council (which means a consecutive absence from three strictly confidential meetings and three public meetings in total) without reasonable explanation will be considered a breach of the code of conduct. Statutory committee members who fail to attend three scheduled meetings of the statutory committee they are appointed to without reasonable explanation will not be subject to annual reappointment. Independent Committee members who fail to attend three scheduled meetings of the relevant committee without reasonable explanation will be subject to automatic removal by Nominations Committee. In every circumstance, the Chief of Staff will write to the member providing advance notice of the intention to remove the member, in case the member wishes to offer an explanation or alternative course of action for the relevant decision-maker to consider.

Confidentiality

4.14 Members must respect the confidentiality of the information shared with them in the context of their duties with the GOC. They must not distribute it to others outside the GOC. It is only permitted to share documents that are already in the public domain. If members wish to use information that is not in the public domain, then they should contact the relevant author to obtain the necessary permission. If they are uncertain of the document's provenance, then they should contact the Chief of Staff. Any deliberate sharing of sensitive information with third parties without express written permission will be considered a breach of the code.

4.15 Members are required to comply with the GOC's information governance framework, including any instructions provided by the Information Governance team about the secure storage and disposal of confidential information.

Expression of views and communication

4.16 Members are required to distinguish clearly, when speaking, writing or otherwise acting, between their personal or professional views (including those of their employers or other organisations they work for) and those of the GOC. It is important that any communication or actions, regardless of whether they are personal or not, do not undermine public confidence in the GOC's ability to

regulate, and do not interfere with the GOC's charitable purpose. This extends to social media used in a personal or professional capacity. Any misrepresentation of the GOC's views or reputational harm that arises from a member's communications are likely to be considered a breach of the code.

4.17 Members should not take any action or make any commitment which might be construed as being done on behalf of the GOC, unless authorised by the GOC to do so.

4.18 In relation to queries or correspondence on policy matters, Council members should seek the advice and views of the executive. Council members should uphold collective responsibility in responding to queries, as set out in the GOC's standing orders.

4.19 Any queries or correspondence about operational decisions involving cases of individual registrants are to be referred to the executive for any response. In some circumstances members may wish to respond directly to the individual or organisation that has written to them. The Chief of Staff can provide a draft form of words for members to use.

4.29 Any communication with the media that carries reputational impact for the GOC should be discussed with the Head of Communications and Engagement, Chair of Council and Chief of Staff before a statement is made. This includes statements of a general nature (which may not be specifically related to Council work or policy but could impact the perception of the GOC) or more particularly which is about the Council's work or policy. Communication includes publication of views via the internet, social media or other public platforms.

Member review and personal development

4.30 The member review policy describes the purpose and process for member reviews. Council members are required to engage in the review process, and failure to do so without reasonable grounds will be considered a breach of the code.

4.31 All members are required to commit to personal and professional development, including briefings and development offered by the GOC. The mandatory training required of members will be determined by the Chief of Staff in consultation with the Nominations Committee.

Management of interests

4.32 All members are required to disclose and manage any conflicts of interests relevant to their duties at the GOC, including those that might relate to a connected person.

4.33 The management of interests policy provides explicit guidance for members on the management of interests, and any failure to disclose any relevant conflict in a timely fashion is likely to be considered a breach of the code of conduct.

4.34 If something within this policy brings an individual into conflict with their obligations outside of the GOC, then they should seek advice from the Chief of Staff as a priority.

Working with the executive

4.35 Effective working relationships between members and others working on behalf of the GOC are essential for the discharge of the GOC's regulatory duties. It is acknowledged that good working partnerships are critical to the governance and culture of the organisation, regardless of seniority, responsibilities or other relevant factors.

4.36 There is an expectation that members and employees will show each other mutual respect and courtesy when working together. This expectation extends to anyone undertaking work on behalf of the GOC, including contractors, workers and others.

4.37 The GOC recognises that the independence of its members is a critical part of how the organisation discharges its regulatory obligations. Parallel to this independence is the expectation that those working on behalf of the GOC can speak with candour in pursuit of the GOC's statutory purpose, and that members will give due regard to any advice or views provided for that aim.

4.38 While members can rely on appropriate advice and support from the executive when performing their duties, both the executive and its members will seek to preserve that independence and not knowingly place each other in a position where the principles of public life could be comprised. Any deliberate attempt to do so by a GOC employee is likely to be considered a disciplinary matter. Any deliberate attempt to do so by a member is likely to be considered a breach of this code.

4.39 The GOC maintains this independence through its organisational structure, committee terms of reference, schemes of delegation, reporting lines, policies and protocols. Underpinning this are the following general principles:

- Decisions about members, whether these be matters of policy or in respect to individual members, will be taken by members, except where certain administrative functions are explicitly delegated by Council (such as the payment of expenses);
- Where policies apply to members and others working on behalf of the GOC, the presumption will be that the approval rests with Council unless explicitly delegated;
- Decisions about members will be taken with consideration of the views of the executive, where necessary or appropriate;

- Decisions about members will not be subject to undue influence by the executive;
- Decisions about individual staffing matters will not be made by members, except in the limited circumstances as set out in the Council scheme of delegation (such as the appointment of the Chief Executive and Registrar); and
- Decisions about individual staffing matters will not be subject to undue influence by members.

4.40 If circumstances arise where there is uncertainty in respect to where the necessary authority lies, and policies or procedures are silent on how these principles should be applied, then the Chief of Staff will determine the necessary procedures to ensure the GOC's compliance with its governance framework and these principles.

Bullying and harassment

4.41 The GOC does not tolerate bullying or harassment and will consider such behaviour a breach of the code of conduct.

4.42 The Advisory, Conciliation and Arbitration Service (ACAS) describes bullying as unwanted behaviour from a person or group that is either:

- offensive, intimidating, malicious or insulting; or
- an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone.

4.43 Bullying might:

- be a regular pattern of behaviour or a one-off incident;
- happen face-to-face, on social media, in emails or calls;
- happen at work or in other work-related situations; and
- not always be obvious or noticed by others.

4.44 It is possible someone might not know their behaviour is bullying. It can still be bullying even if they do not realise it or do not intend to bully someone.

4.45 In addition to the above, under the Equality Act 2010, unwanted conduct behaviour can be harassment if it relates to any of the below listed 'protected characteristics' and has the purpose or effect of either (a) violating the other person's dignity or (b) creating an intimidating, hostile, degrading, humiliating or offensive environment for the other person. The relevant characteristics are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race

- religion or belief
- sex
- sexual orientation

4.46 Members can also have confidence that the GOC will take any concerns about bullying and harassment by others seriously. This will include investigation where necessary.

4.47 Where members witness bullying or harassment, they have a responsibility to speak up under the GOC's freedom to speak up policy.

Personal relationships in the workplace

4.48 It is rarely appropriate for members and the executive to have personal relationships that extend beyond the workplace and what would be expected in a professional setting. While circumstances may arise from time to time that could be considered manageable, it is critical that any personal or family relationships are disclosed to the Chief of Staff and appropriately considered under the management of interests policy.

Sexual harassment

4.49 Sexual harassment, or victimisation connected to it, is unlawful and will not be tolerated. We will take active steps to help prevent the sexual harassment and victimisation of anyone working on behalf of the GOC. Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it in accordance with the organisation's commitments and legal duties. This will enable us to take appropriate action and provide support.

4.50 Sexual harassment and victimisation will be considered a serious breach of the code of conduct in respect to members.

5. Specific responsibilities: Council

Trustee duties

5.1 The GOC is a charity registered in England and Wales, and is subject to charity law. Council members are charitable trustees as defined within the Charities Act 2011 and are required to act in accordance with charity law and guidance. Failure to comply with the duties and responsibilities of a charitable trustee will be considered a breach of the code of conduct.

5.2 The Council is collectively responsible for decision-making, and individual Council members are bound by the provisions within the standing orders of the Council. Failure to comply with the standing orders is likely to be considered a breach of this code of conduct.

5.3 Council members accept collective responsibility for the pursuit of the Council's objectives and for decisions taken by Council. Council members are expected to contribute to discussion and debate freely to enable a robust decision to be

made. Once Council has taken a decision, individual Council members must support the communication and implementation of that decision.

Public office duties

5.4 Although not publicly funded, the GOC is a public body for some purposes including judicial review and freedom of information requests. Accordingly, members may be classified as holders of public office, and thus may be subject to the common law offence of misconduct in public office (and any offences that are introduced by the Public Office (Accountability) Bill) as well as the tort of misfeasance in public office. Any such adverse finding will be considered a breach of this code.

6. Specific responsibilities: Council Associates

6.1 Council has opted to establish a Council Associate scheme. This is open to registrants, and the purpose of scheme is to:

- enrich debate and ensure a greater diversity of lived experiences to inform our decision making.
- offer talented candidates the experience and skills needed to go on to have a rewarding boardroom career.

6.2 Council Associates will take part in all our Council meetings and associated activity. They will also get involved in our Audit, Finance and Risk Committee to maximise their transferable experience of governance.

6.3 Due to our governing laws, the legal obligations outlined in section four above do not apply to Council Associates. Council Associates cannot be voting members when decisions are taken. However, they will be expected to maintain a high level of professional integrity, confidentiality and conduct, including those responsibilities outlined in section five. As registrants, Council Associates are required to uphold the standards required of them by the GOC.

7. Allegations relating to conduct

7.1 The public can refer concerns about a member's conduct via the corporate complaints policy. The policy includes a section about how the GOC will consider complaints about members.

7.2 Those working on behalf of the GOC can refer their concerns under the GOC's freedom to speak up policy. This should be referred to the Chief of Staff unless there is a conflict of interest, in which case the issue should be raised with another named person in the policy (for example, the Chair of Council, Senior Council Member or Chief Executive and Registrar).

7.3 The Chief of Staff will ensure that the Chair of Council, or another appropriate member, is engaged at the point the concern is received. The Chief of Staff will consult with the appropriate member on whether the member subject to referral

is invited to temporarily withdraw from duties. It is expected that any member invited to withdraw from duties will comply with the request until such time as the matter is resolved.

8. Sanctions relating to conduct

8.1 The grounds for disqualification are matters that would be established by another authority, such as a court of competent jurisdiction, a regulator (including the GOC's fitness to practise committee) or other statutory authority. Matters of disqualification are therefore not covered by the code of conduct. Where circumstances have arisen where a member has been disqualified from office by virtue of a condition within the relevant legislation, the Chief of Staff will take the necessary steps to remove them from office without delay.

8.2 The legislation described in section four of this code sets out the grounds for possible suspension and removal from office. Council has determined that the following are potential actions available when matters do not result in a suspension or removal from office:

- a breach of code of conduct letter will be sent to the member;
- an action Council requires the member to undertake;
- written commitment from the member to abide by specific conditions; or
- a requirement to undertake further education and education and training.

8.3 Council will determine the process by which issues relating to member conduct, sanctions and the possible removal or suspension from office are considered.