

Annex 4: Council member appointment: Equality Impact Assessment

Step 1: Scoping the EIA

Name of the policy/function:	Council member appointment process
Assessor:	Paul Johnston (Governance Manager)
Date EIA started:	25 January 2016
Date EIA completed	19 April 2016
Last updated:	n/a
Date of next EIA review:	September 2016
<p>Purpose of EIA: This EIA is being undertaken because:</p> <ul style="list-style-type: none"> • we are committed to our Public Sector Equality Duty and as such periodically review our approach toward equality, diversity and inclusion in our Council member appointment process; • we would like to identify if there are any potential barriers to fair appointment within our process; and • we are due to undertake significant recruitment for Council member positions over the forthcoming business year. 	

Q1. Has a screening assessment been used to assess which of the equality groups the policy is relevant to?

A screening assessment has not been completed.

Q2. What are the main aims, purpose and outcomes of the policy? You should be clear about the policy proposal: what do you hope to achieve by it? Who will benefit from it?

Aims:

The aim of the process is to ensure that the GOC appoints members of its Council (and committees) fairly and in line with our EDI commitments. The process aims to take a robust approach to reduce the possibility for unconscious and conscious barriers or bias to interfere with fair recruitment, and that appointments are made with candidates having met the Council's skills and competencies requirements.

We are committed to promoting the benefits that a representative diverse composition of our Council (and committees) will bring to the optical profession and the wider public.

This is not a new process or policy; we are clear that, based on experience in recent years, the process we currently follow meets PSA expectations of good practice. We consider that the main beneficiary of a robust process is the Council itself; a robust process lends itself well to appointees that meet the Council's skills and competencies requirements. We are also keen to ensure that there are no barriers to prevent the composition of our Council (and committees) from being reflective of the diversity of both the optical profession and the wider public.

Purpose and Outcome:

This process is designed to ensure that members of the Council are appointed fairly, on merit and in line with general good practice in this area, and that any areas of potential (conscious or unconscious) bias or barriers are managed appropriately.

Outcomes include:

- Appointment of members of Council and its committees that meet the Council’s ongoing skills and competencies requirements;
- Appointment of candidates that most closely meet the competency requirements for the position from having a process in place that enables members to be appointed fairly and on merit
- Integrity that our process is in line with good practice both within and outside of the healthcare regulatory sector.

Long-term benefits include:

- Having a diverse non-executive team with people from different racial, educational and social backgrounds and a diverse age range will improve decision-making, helps to encourage creativity and foster innovation.

Who will benefit: Council; the GOC more widely; and the sector that we regulate.

Q3. Which aspects/activities of the policy are particularly relevant to equality?

At this stage you do not have to list possible impacts, just identify the areas.

Activity/Aspect
Timetable
Competencies
Application process
Interviews
Advertising, information and support (including communications)
Selection Panel
Selection decisions (at each stage of the process, i.e. sifting, shortlisting and interviews)

Q4. Gathering the evidence

List below available data and research that will be used to determine impact on the different equality groups.

Available evidence- used to scope and identify impact
<p>In determining probable impact on different groups under the Equality Duty, we have had reference to the following:</p> <ul style="list-style-type: none"> • Data on the equality and diversity of our Council and committees (as of 2015) and data on applicants (broken down by three stages; 1) all applicants, 2) those selected for interview and 3) those recommended for appointment.)

- The approach taken toward equality, diversity and inclusion in non-executive appointments by other UK healthcare regulators;
- Examples of good practice, including the approach taken by UK government departments, Equality and Human Rights Commission, guidance from the Chartered Institute for Personnel and Development and attendance at diversity-focussed events.
- General feedback from candidates in previous recruitment exercises and feedback and guidance from the Professional Standards Authority (PSA).

Q5. Evidence gaps

Do you require further information to gauge the probability and/or extent of impact?

We do not consider there to be any further information required at this stage.

On a periodic basis, we will monitor equality and diversity data for the composition of our Council and committees and those applying for Council / committee positions; we may hope that, through introducing refinements to our process designed to broaden the diversity of our applicants and successfully selected candidates, the diversity of our members may increase accordingly.

Q6. Involvement and consultation

Consultation that has taken place, who with, when and how:

No external public consultation is currently scheduled. We will consider the most effective means of securing external feedback in shaping the next iteration of our member appointments policy.

Consultation has taken place with the following stakeholders:

GOC Council; GOC Nominations Committee; the Professional Standards Authority

Summary of the feedback from consultation:

Consultation with the PSA – achieved through their scrutiny of the appointments process at the design stage, and of the process undertaken following a candidate being nominated for a Council position – takes place for every Council member appointment. PSA feedback is helpful in refining future processes. Our processes are in line with our member appointments policy, which has been considered by Nominations Committee and Council in 2014, and is next scheduled for review in 2017.

Link to any written record of the consultation to be published alongside this assessment:

No consultation planned at this stage.

How engagement with stakeholders will continue:

As above – we will continue to consult with PSA and review our overarching policy in 2017.

We will engage further with registrants in 2016 to understand barriers to applying, including through forthcoming registrant survey and through attendance at optical events and conferences to discuss these issues with registrants.

In addition, we will consider the most effective means of securing external feedback from those that apply for Council/committee member positions on whether they found the process accessible and fair.

Step 2: Assessing impact and opportunities to promote equality

Look at the areas identified in question 3 as being relevant to equality (and any others identified during the evidence gathering or consultation stages) and document in the table below.

Q7: Using the evidence you have gathered what if any impacts can be identified. Please use the table below to document your findings and the strand(s) affected.

Activity/Aspect	Potential/Actual Impact
Timetable	<ul style="list-style-type: none"> The timing of application deadlines and interview dates may prevent applicants from certain groups from applying
Competencies	<ul style="list-style-type: none"> Language used in competencies may be exclusive or may discourage applicants Potential impact on age through framing competencies to suggest a level of experience which comes with age Potential impact on gender through framing competencies in words indirectly or directly associated with a particular gender
Application process	<ul style="list-style-type: none"> Process of completing competency based application forms may favour applicants with certain backgrounds Process may have an impact on certain groups of which we are not aware
Interviews	<ul style="list-style-type: none"> Potential impact on disability if interviews are not held at an accessible venue or applicant is not able to travel
Advertising, information and support (including communications)	<ul style="list-style-type: none"> Potential applicants may be deterred from applying due to a perception that our non-executive roles are for 'certain groups' Potential applicants may not see the advert due to where it is advertised Potential impact on disability as applicants may not be able to access the information pack or application form due to its format
Selection Panel	<ul style="list-style-type: none"> Selection Panel may not be diverse in membership, which limits diversity of thought Selection Panel may not be aware of their equality and diversity responsibilities

Selection decisions (at each stage of the process, i.e. sifting, shortlisting and interviews)	<ul style="list-style-type: none"> • Selection decisions may be influenced by unconscious biases
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Q8: What can you do further to maximise opportunities to further promote equality. Please document below.

Step 3: Strengthening your policy

What can be done to remove or reduce any impact identified?

Activity/ Aspect	Potential/Actual Impact	Strengthening actions to remove or reduce impact. For actions, include timeframes.
Timetable	The timing of application deadlines and interview dates may prevent applicants from certain groups from applying	We endeavour to avoid organising interviews during the school-holiday period, religious holidays and other days for our application period. Search engine calendar checks to ensure no conflicts with religious holidays or UK half-terms or holidays. Completed in January 2016 and for each selection campaign
Competencies	Language used in competencies may be exclusive or may discourage applicants	The application process is competency-based; this is applied consistently for each applicant, which is designed to ensure that the process is objective and based on merit
	Potential impact on age through framing competencies to suggest a level of experience which comes with age	Review of competencies to focus on ensuring that competencies are simplified, “word-tested” and behavioural. To be completed by Q2 16/17

Activity/ Aspect	Potential/Actual Impact	Strengthening actions to remove or reduce impact. For actions, include timeframes.
	Potential impact on gender through framing competencies in words indirectly or directly associated with a particular gender	
Application process	Process of completing competency based application forms may favour applicants with certain backgrounds	<ul style="list-style-type: none"> • Application guidance is being developed to show candidates how to answer competency based questions (i.e. the star approach). To be completed by March 2016
	Process may have an impact on certain groups of which we are not aware	<ul style="list-style-type: none"> • All applicants are asked to advise if they require any reasonable adjustments to be made at any part of the process. • We have an appointment complaints process and ask candidates for feedback on the process at interview. This is a potential further source of evidence (although we have not received any complaints since the process was introduced). • We communicate openly and honestly with candidates at all stages of the recruitment cycle. • Consider our process of providing feedback on request only for those who attend interviews. To be completed by September 2016
Interviews	Potential impact on disability if interviews are not held at an accessible venue or applicant is not able to travel	<ul style="list-style-type: none"> • Interviews are held in our London office, which is fully compliant with the provisions of the Disability Discrimination Act. • We could consider web/skype interviews if applicants are unable to travel. To be completed by April 2016.

Activity/ Aspect	Potential/Actual Impact	Strengthening actions to remove or reduce impact. For actions, include timeframes
Advertising, information and support (including communicatio ns)	Potential applicants may be deterred from applying due to a perception that our non-executive roles are for ‘certain groups’	<ul style="list-style-type: none"> • Attendance at optical conferences/ open days to engage with registrants directly to see whether barriers exist to these type of roles; and generate interest. <i>NB Not directly relevant to lay member Council vacancies. To be completed September 2016.</i> • Refinements to advertising; for example advertisement to adopt more inclusive language; including a segment written by our members who explain what the role “looks/feels” like. To be completed by March 2016
	Potential applicants may not see the advert due to where it is advertised	<ul style="list-style-type: none"> • For lay vacancies, we advertise via a range of national organisations, including <i>womenonboards</i> and BME-focussed media, who have a specialist interest in equality, diversity and inclusion. • For registrant vacancies, an email is sent to all registrants. • All vacancies advertised state that applications are welcomed from all backgrounds; and that the positions are filled through open competition.
	Potential impact on disability as applicants may not be able to access the information pack or application form due to its format	<ul style="list-style-type: none"> • We make information pack and application forms available in alternative formats on request and make this clear in advertising

Activity/ Aspect	Potential/Actual Impact	Strengthening actions to remove or reduce impact. For actions, include timeframes
Selection Panel	Selection Panel may not be diverse in membership, which limits diversity of thought	<ul style="list-style-type: none"> Consider the composition of Selection Panel members for each vacancy, ensuring that members hold collectively a wide range of skills and experience; are able to reflect any relevant perspectives; and are from different professional and personal backgrounds and demographics
	Selection Panel may not be aware of their equality and diversity responsibilities	<ul style="list-style-type: none"> Members will have online refresher training to ensure they are aware This EIA will be distributed to all members of the panel to raise awareness
Selection decisions (at each stage of the process, i.e. sifting, shortlisting and interviews)	Selection decisions may be influenced by unconscious biases	<ul style="list-style-type: none"> All applications are assessed (at sifting, shortlisting and interview stage) against the common objective selection criteria, which was agreed prior to launching; and remain unchanged once published. The same interview questions are used for all candidates Selection panel have received unconscious bias training and guidance will be provided to the Selection Panel. To be completed by April 2016. An independent member is present on each selection panel, who can provide objectivity, scrutiny and impartiality to the process.

Step 4: Monitoring and review

Q10. What monitoring mechanisms do you have in place to assess the actual impact of your policy?

As noted above, we will continue to undertake monitoring of the diversity (against the protected characteristic groups) of applicants at each stage of each appointment process. We will also, as noted above, be considering the most effective means of securing feedback from those that have engaged with our non-executive appointment process.

Please provide a review date to complete an update on this assessment.

Date: September 2016