

College’s Diversity, Equity & Inclusion (DEI) Plan

Overall DEI Objectives: To be used to steer the College’s DEI initiatives and act as a benchmarking tool when assessing DEI performance year-over-year.

To develop this Plan, the College’s DEI Working Group studied the *Global Diversity, Equity & Inclusion Benchmarks: Standards for Organizations Around the World* (GDEIB). With permission we selected the 45 benchmarks that applied most to the College from the GDEIB. Go to the GDEIB publisher’s website: www.centreforglobalinclusion.org to learn more about the full list of DEI Benchmarks developed by the 3 coauthors and 112 Expert Panellists (EPs) from around the world. The first edition of this work was created in 2006. It has been updated about every 5 years, with the most recent edition being the 2021 GDEIB. The research is managed by the coauthors using a consensus model that engages all 112 EPs.

One of the College’s strategic priorities for the next three years is to enhance DEI. The selected benchmarks are being used by the College as a guide to help devise projects and initiatives that will enhance DEI for all the College’s stakeholders, including staff, the College’s members, and the public. The projects and initiatives developed, once implemented, will also assist the College in meeting the selected benchmarks. The projects/initiatives proposed below in green have not yet been implemented.

1) VISION AND STRATEGY

Objective/Benchmark	College Project or Initiative	Current Status	Overlap with another strategy
<p>a. The College’s DEI vision and goals to embed equity, prevent harassment, and reduce or eliminate discrimination and oppression are part of the organizational strategy. DEI is also defined broadly to include visible, non-visible, inherent, and acquired dimensions. (Corresponding Global DEI Benchmark 1.7 and 1.14)</p> <p>b. The majority of stakeholders acknowledge that DEI is important to the success of the</p>	<p>Incorporated into 2022-25 Strategic Plan</p> <p>Added "visible, non-visible..." components to the definition of “diversity” under DEI in this Plan</p> <p>Incorporate or note DEI considerations in briefing materials/briefing notes and reports when applicable</p>	<p>Met and ongoing</p>	

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organization. (Corresponding Global DEI Benchmark 1.8)			
c. The College's DEI goals are developed with input from a variety of internal and external stakeholders. (Corresponding Global DEI Benchmark 1.15)	Creation of DEI working group. Staff are internal stakeholders, and their input was used to develop the College's DEI plan. Other health regulatory colleges (external stakeholders) or their resources were consulted in developing DEI initiatives (such as CASLPO, College of Opticians) Feedback and input from <i>all</i> staff will continue to be solicited and opportunities for collaboration with other colleges will be sought	Met and ongoing	Broaden stakeholder engagement
d. Compliance with legislation that protects human rights and ensures safe and accessible workplaces is included in the DEI Plan. (Corresponding Global DEI Benchmark 1.16)	All projects developed under the DEI Plan will keep this in mind and those initiatives may include legal review as a step prior to implementation.	Ongoing	
e. The College is proactive and responsive to DEI challenges that are faced by society, specific to healthcare and/or vision care. (Corresponding Global DEI Benchmark 1.4)	Researching what challenges are faced in the vision field by those in traditionally equity seeking groups (e.g., patients on ODSP and/or Ontario Works, indigenous patients)	Not met	Develop and carry out a research agenda Ensure the public's access to care

2) LEADERSHIP AND ACCOUNTABILITY

Objective/Benchmark	College Project or Initiative	Current Status	Overlap with another strategy
a. To increase their knowledge and competence, council and management participate in education and training related to DEI. (Corresponding Global DEI Benchmark 2.12)	Management & Council received training from Dr. Jalal at its June 2022 council session. A DEI related educational session will be part of <i>at least 2</i> out of 4 council meetings each calendar year. This can include experiential training where Council members participate in hypothetical scenarios, listening to speakers, or receiving education from experts and specialists in the field. Requirement for each member of the Senior Management Team (SMT) to participate in a <i>minimum</i> of	Partially Met	Broaden stakeholder engagement

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	1 external workshop/ webinar/course on DEI each calendar year to ensure ongoing competence. Completion will be confirmed during annual performance appraisal.		
b. Management engages in DEI issues important to staff, the members the College regulates, and the public at large. Management and council members publicly support DEI-related initiatives. (Corresponding Global DEI Benchmark 2.11 and 2.3)	<p>Land acknowledgement statement developed and communicated during Council meetings. Land acknowledgement statement to be part of the agenda for all Committee meetings of the College and to be recited by the Committee/Panel chair.</p> <p>To understand which issues are pertinent, the following will be undertaken:</p> <ul style="list-style-type: none"> • Investigations Department to collect and record data on the # and types of inquiries, complaints, and registrar’s investigations each year where concerns about discrimination, prejudice, or barriers to care due to protected grounds under the <i>Human Rights Code</i> are raised. This will be reported to SMT at the end of each calendar year. <ul style="list-style-type: none"> ○ Practice Advisors to also collect and report data as per above. • Poll or Survey to members to determine DEI related issues important to them or for which they would like more College guidance. • SMT to monitor current events and news 	Not met	Broaden stakeholder engagement (applies to the initiative related to the polling of members)
c. The management team and council are diverse, engaged in DEI issues, and accountable for achieving the DEI strategy. (Corresponding Global DEI Benchmark 2.7)	To ensure and encourage diversity among council members, elections will be promoted widely with common myths dispersed (i.e., there <i>is</i> reimbursement, a newly registered member <i>can</i> run). A live webinar with the Registrar can be held <i>before</i> self-nomination where there is an opportunity for direct Q&A.	Partially Met	Constructively implement governance reform

3) STRUCTURE AND IMPLEMENTATION

Objective/Benchmark	College Project or Initiative	Current Status	Overlap with another strategy
a. Members of the DEI working group are responsible for the DEI strategy and utilize their knowledge and the expertise of external resources to provide advice when called upon. (Corresponding Global DEI Benchmark 3.17)	Regular meetings of the DEI working group are held, with frequent review of the DEI Plan and reporting to SMT.	Met and ongoing	
b. The College provides resources, staffing, and support to steer and implement its DEI plan. (Corresponding Global DEI Benchmark 3.8)	Allocation within annual budget for DEI related activities	Partially met	

4) ASSESSMENT, MEASUREMENT, AND RESEARCH

Objective/Benchmark	College Project or Initiative	Current Status	Overlap with another strategy
a. Staff, council, and the member base are supportive of the College's DEI measurements and participate in assessment, measurement, and research. (Corresponding Global DEI Benchmark 8.13)	Confidential survey will be created for staff to provide their feedback and opinion on the DEI related areas they feel (as an employer) the College is exceling in and any areas for improvement.	Not met	
b. Assessments and surveys take into account issues such as language, education levels, and accessibility. (Corresponding Global DEI Benchmark 8.14)	Poll/survey will be developed for members --- see <i>initiative listed under item 2(b)</i> All surveys/polls developed will undergo a plain language review and will be available in various formats (e.g., in paper format, online link etc.)		

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<p>c. The College regularly conducts a census of member demographics and monitors representation among optometrists in Ontario. Data are sorted by self-identified characteristics and diversity dimensions to increase the College’s learnings about member groups and to shape future DEI initiatives. The principles of self-identification for use in collection of member information are clear and applied ethically.</p> <p>(Corresponding Global DEI Benchmark 8.16 and 8.17)</p>	<p>As of the November 2023 annual renewal, members will be asked demographic and other DEI related questions when renewing their registration. It will be a section in the annual renewal form, where the purpose of the collection of this data will be explained and it will be clarified that members’ self-identification information will be used for statistical purposes only and will be confidential. This exercise will be optional and not mandatory. An external vendor may be partnered with for assistance in devising or reviewing the questions asked.</p>	<p>Not met</p>	<p>Broaden stakeholder engagement</p>
<p>d. DEI assessments are conducted every three years on the College overall, and the results are incorporated into strategy and implementation.</p> <p>(Corresponding Global DEI Benchmark 8.1)</p>	<p>The objectives of this DEI plan also act as benchmarks. While the College’s progress on these benchmarks and objectives will be monitored regularly, in three years a thorough assessment will be undertaken, with the identification of additional projects and initiatives.</p>	<p>Not met</p>	
<p>e. The College engages and consults with the public and incorporates their feedback into the DEI plan and other College policies.</p>	<p>A feedback box will be created and made available on the College’s DEI webpage that will allow visitors to input their thoughts.</p>	<p>Not met</p>	<p>Broaden stakeholder engagement</p>

5) COMMUNICATIONS

Objective/Benchmark	College Project or Initiative	Current Status	Overlap with another strategy
<p>a. The College integrates DEI into its communications wherever possible (Corresponding Global DEI Benchmark 9.11)</p> <p>b. The College encourages staff to discuss DEI and provide input on the College’s DEI initiatives. (Corresponding Global DEI Benchmark 9.12)</p>	<p>During a staff meeting every quarter (i.e., every 3 months), having a speaker present (such as from a traditionally equity seeking group or a specialist in the DEI field) or have a learning session dedicated to DEI (this can include scenarios, case studies and discussions etc.)</p> <p>Survey will additionally be developed for staff --- see <i>initiative listed under item 4(a)</i></p>	<p>Not met</p>	

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<p>c. The College enables staff to indicate gender pronouns, if desired, on email signatures and other written communication. (Corresponding Global DEI Benchmark 9.13)</p>	<p>Staff have the option to note gender pronouns if they wish.</p>	<p>Met</p>	
<p>d. Translations and other accessible formats are provided when needed. (Corresponding Global DEI Benchmark 9.14)</p>	<p>French translation of webpages frequently accessed by the public completed in August 2022.</p> <p>For parties to a complaint and/or witnesses in a Registrar’s Investigation, translation services are provided on a case-by-case basis, as needed. Paper copies of complaint form can also be provided.</p> <p>Translate the pages in the College’s website that are primarily for the public into the 5 most spoken non-official languages of Ontario.</p>	<p>Partially met</p>	
<p>e. DEI content is easily and quickly located on the College’s website. Information is thorough, regularly updated, and fully accessible. (Corresponding Global DEI Benchmark 9.2)</p>	<p>Creation of a DEI Resource webpage, which will contain resources for optometrists/public, including any recorded webinars or videos, and links to relevant external literature.</p>	<p>Not met</p>	
<p>f. The College uses brave and transparent communication in naming and dealing with challenging issues such as racism, sexism, homophobia, privilege, toxic masculinity, and white supremacy. (Corresponding Global DEI Benchmark 9.4)</p>	<p>The College will release statements (i.e., condemning, acknowledge, raising awareness etc.) via its website, social media channels and eblasts depending on situations it comes across or which arises in the world.</p>	<p>Not met</p>	
<p>g. Updates and information on DEI are sent regularly and systematically through a variety of channels to staff and other stakeholders. (Corresponding Global DEI Benchmark 9.7)</p>	<p>Via the newsletter, updates will be sent to members summarizing any training or educational sessions undertaken by the Council. The June 2022 newsletter contained such an update.</p>	<p>Partially met and ongoing</p>	
<p>h. All staff are able to incorporate DEI sensitive language and plain language principles into their correspondence and communications. (Corresponding Global DEI Benchmark 14.6)</p>	<p>Relational or accessible, plain writing workshop will be scheduled and provided to all staff in 2023.</p>	<p>Not met</p>	
<p>i. The Optometric Practice Reference (OPR) communicates to</p>	<p>Subject to CPP and Council approval, a DEI specific Standard or an addition to OPR 2.4</p>	<p>Not met</p>	

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<p>members the College's DEI expectations with regard to their interactions with patients.</p>	<p>(which speaks to acting in the patient's best interests) may be developed.</p> <p>Conduct a review and make any necessary updates to the College's Anti-Discrimination Policy guideline for members (which was effective as of January 2013). Subject to CPP and Council approval, this policy may be updated by taking inspiration from CPSO's policy on accepting new patients https://www.cpso.on.ca/Physicians/Policies-Guidance/Policies/Accepting-New-Patients</p>		
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6) LEARNING AND DEVELOPMENT

Objective/Benchmark	College Project or Initiative	Current Status	Overlap with another strategy
<p>a. Learning and education on DEI addresses racism, anti-racism, sexism, white supremacy, privilege, internalized oppression, classism/casteism, homophobia, transphobia, religious bias, disabilities, mental health awareness, and other issues. (Corresponding Global DEI Benchmark 10.3)</p> <p>b. Experiential learning and speakers with diverse voices help staff and council understand different identities and learn how to best respond to DEI situations. (Corresponding Global DEI Benchmark 10.12)</p>	<p><i>These topics will be addressed when undertaking the initiatives listed under items 5 (b) and 2(a)</i></p>	<p>Not met</p>	
<p>c. Public and optometrist members who serve on council and committees receive the necessary resources and training to embed DEI in the work they do. (Corresponding Global DEI Benchmark 10.1)</p>	<p>Unconscious bias training and DEI education will be provided to Committees during their orientation at the start of each calendar year.</p> <p>Members who assess and/or coach other members as part of the Quality Assurance Program or as part of compliance monitoring for resolved cases in the Investigations department will receive unconscious bias training.</p>	<p>Not Met</p>	

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<p>d. The College ensures that all relevant stakeholders are able to fully participate in virtual meetings, innovative learning methods, and the use of technology. (Corresponding Global DEI Benchmark 10.13)</p>	<p>The College provides clear instructions and offers assistance using virtual platforms for staff, Council, Committee members, and participants in an electronic Discipline hearing. Recordings of trainings are also provided to those Council or Committee members who are unable to attend the session.</p>	<p>Met and ongoing</p>	
<p>e. The College encourages cultural celebrations and organization-wide activities that combine social interaction with DEI learning. (Corresponding Global DEI Benchmark 10.15)</p>	<p>A DEI calendar of events will be developed that denotes the dates of cultural and religious occasions and holidays. This will be updated each year and made accessible to staff. Staff will be encouraged to share and showcase their different cultural celebrations and/or practices during staff meetings. Cuisines from different parts of the world may be tried as part of team building activities.</p>	<p>Not met</p>	
<p>f. The College’s members are educated on the importance of equity and ways to mitigate and remove discrimination and bias in their interactions with patients, their staff, and partners in the healthcare field. (Corresponding Global DEI Benchmark 10.8)</p>	<p>For the next three-year continuing education (CE) cycle (beginning in January 2024), the Quality Assurance Panel will consider adding a DEI course requirement (e.g., members must complete 1 credit hour related to DEI).</p> <ul style="list-style-type: none"> College may develop a one-hour e-module on advancing DEI in the optometry profession by August 2023. <p>The College can host learning sessions that are streamed onto YouTube live (as well as recorded) for members and the public to recognize Black History Month, International Women’s Day, Pride Month, Asian Heritage Month etc. This may involve optometrists from these groups speaking about their experiences in the profession and providing advice for students and new members hoping to enter the profession.</p> <p>Development of DEI related case studies for the Q&A portion of the monthly newsletters to members. This can include complex clinical scenarios such as dealing with a patient with a disability or mental illness; and what the optometrist is to do if</p>	<p>Not met</p>	<p>Broaden stakeholder engagement</p>

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	they are the subject of discrimination from their patient.		
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7) EXTERNAL EFFORTS

Objective/Benchmark	College Project or Initiative	Current Status	Overlap with another strategy
a. The College uses the services of organizations/vendors that align with our DEI values. (Corresponding Global DEI Benchmark 15.4 and 15.7)	Development of a written policy to record acceptable/unacceptable criteria and/or considerations when hiring external vendors. This may be incorporated into the College's Procurement Policy of Goods and Services or incorporated into Requests for Proposals.	Not met	
b. The College partners with other organizations (e.g., other health regulators) that work to advance the rights of underrepresented groups in the community. (Corresponding Global DEI Benchmark 12.12)	A staff member will represent the College on HPRO's Anti-BIPOC racism working group and any similar groups offered via CNAR/CLEAR.	Not met	Broaden stakeholder engagement
c. The public understands that the College is available to receive feedback and complaints related to any discriminatory interactions they experience.	In the complaints and DEI pages on the College's website, it will be noted that the College/ICRC has jurisdiction and authority to investigate complaints of such nature. Advertisement campaign about the College and its purpose and how to contact the College (advertised in long-term care homes, retirement centres, community centres, new immigrant centres).	Not met	Broaden stakeholder engagement
d. The College attracts a diverse range of applicants who wish to enter the profession and partners with post-secondary institutions to increase diversity among optometric students.	College will target secondary school students in low income neighborhoods around Ontario and schools with a large attendance of youth from an Indigenous background to increase awareness of the profession and increase understanding of the regulation of optometrists (opportunity to partner with University of Waterloo and/or the	Not met	Broaden stakeholder engagement

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	<p>OA0). Presentations will be given to students in grade 10/11.</p> <p>The College may have a booth in widely attended career fairs and/or at the Ontario Universities' Fair (OUF).</p> <p>College to offer a needs-based monetary scholarship for a first year and a final year optometry student that intends to practise in Ontario.</p> <p>A marketing campaign on the optometry profession will be created (taking inspiration from CPA Ontario).</p>		
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8) HUMAN RESOURCES

Objective/Benchmark	College Project or Initiative	Current Status	Overlap with another strategy
<p>a. The College's employment advertisements reach broad pools of diverse talent. (Corresponding Global DEI Benchmark 4.11)</p> <p>b. Staff are hired for their competence and their ability to bring diverse perspectives to the work and not only because they are from an underrepresented identity group. (Corresponding Global DEI Benchmark 4.10)</p>	<p>Career opportunities at the College are advertised widely, including over the College's social media channels and on HPRO's job vacancies page.</p> <p>Interviews are conducted using pre-determined questions and the same questions are asked of all candidates that are interviewed.</p>	Met and ongoing	
<p>c. The onboarding process results in all new staff feeling valued and included. (Corresponding Global DEI Benchmark 5.6)</p> <p>d. Policies and practices guard against favouritism and are communicated and applied equitably across the organization in a culturally sensitive way. (Corresponding Global DEI Benchmark 7.7)</p>	<p>There is a social and team building activity at the staff meeting for the new staff member.</p> <p>There is a comprehensive human resources package that is made available to new staff, and which applies to all staff.</p>	Met and ongoing	

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<p>e. Job requirements and descriptions are clear and staff are not evaluated against non-job-related factors, especially those based on preferences and biases. (Corresponding Global DEI Benchmark 6.8)</p> <p>f. The College conducts annual performance reviews and exit interviews to understand its culture of inclusion and belonging. (Corresponding Global DEI Benchmark 5.11)</p> <p>g. Turnover is at an acceptable rate. Adverse impact, unfairness, and discrimination are not the primary cause of turnover. (Corresponding Global DEI Benchmark 5.5)</p>	<p>Prior to performance appraisals, staff have access to their job descriptions and position requirements.</p>	<p>Met and ongoing</p>	
<p>h. The organizational culture equitably treats those who work flexible schedules. (Corresponding Global DEI Benchmark 7.13)</p> <p>i. Technology support for mobility, disabilities, mental health, and flexible work arrangements are available for staff. (Corresponding Global DEI Benchmark 7.12)</p>	<p>The College has a hybrid work policy and provides accommodation to staff as needed.</p>	<p>Met and ongoing</p>	
<p>j. All staff are encouraged to consider professional development opportunities within or outside their current functional, technical, or professional area. (Corresponding Global DEI Benchmark 5.8)</p>	<p>The College's employee professional development policy allows for staff to take a variety of professional development opportunities.</p>	<p>Met and ongoing</p>	

<p>k. Religious practices, cultural celebrations, and holidays are accommodated, even when they are not the practices of the dominant culture. (Corresponding Global DEI Benchmark 7.14)</p> <p>l. Flexibility in personal appearance and designing one’s workspace are accepted if done in a non-offensive manner and under an agreed upon policy. (Corresponding Global DEI Benchmark 7.15)</p> <p>m. Facilities and accommodations for meditation, religious practices, lactation, and other needs are provided. (Corresponding Global DEI Benchmark 7.11)</p>	<p>The availability of accommodation is communicated to staff.</p> <p>A private room exists in the College’s premises that can be utilized for meditation, religious practices, lactation etc.</p>	<p>Met and ongoing</p>	
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DEFINITIONS OF KEY TERMS

The College adopted the meaning of “diversity,” “equity,” and “inclusion,” as defined in the GDEIB:

Diversity refers to the similarities and differences among people, often called diversity dimensions, including, but not limited to: gender, sex, gender identity and expression, ethnicity, race, native or indigenous identity/origin, age, generation, disability, sexual orientation, culture, religion, belief system, marital status, parental status, pregnancy, socio-economic status/caste, appearance, language and accent, mental health, education, geography, nationality, work style, work experience, job role and function, thinking style, and personality type.

Equity is about fairness and justice. It is about taking deliberate actions to remove systemic, group, and individual barriers and obstacles that hinder opportunities and disrupt well-being. Equity is achieved through the identification and elimination of policies, practices, attitudes, and cultural messages that create and reinforce unfair outcomes. Although both equality and equity promote fairness, equality achieves this through treating everyone the same, regardless of need and circumstances. Equity achieves this through treating people differently dependent on need, circumstance and consideration of historical and systemic inequities.

Inclusion is a dynamic state of feeling, belonging, and operating in which diversity is leveraged and valued to create a fair, healthy, and high-performing organization or community. An inclusive culture and environment ensure equitable access to resources and opportunities for all. It also enables individuals and groups to feel safe, respected, heard, engaged, motivated, and valued for who they are.

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