

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>Incorporated DEI considerations in briefing materials/briefing notes and reports when applicable</p>	Met and ongoing	

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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)	<p>Creation of DEI working group. Staff are internal stakeholders, and their input was used to develop the College's DEI plan.</p> <p>Other health regulatory colleges (external stakeholders) or their resources were consulted in developing DEI initiatives (such as CASLPO, College of Opticians)</p> <p>Created and distributed a two-question survey to registrants re. DEI issues important to them and areas in which they would like College guidance. This was shared via the InFocus Newsletter in early 2024.</p>	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 kept in mind these initiatives as a step prior to implementation.	Met and 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)	<p>Created a funding mechanisms webpage to help members of the public understand the various options for covering the costs of eye exams.</p> <p>Implemented a digital accessibility tool to enhance our website's usability for people with various disabilities.</p> <p>During Truth and Reconciliation Week (September 23-27, 2024), the College shared resources on our DEI webpage that focused on Indigenous history and reconciliation & made various social media posts.</p>	Met	<p>Develop and carry out a research agenda</p> <p>Ensure the public's access to care</p>

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)	Since summer 2022 several DEI sessions were presented to Council as part of their regular meetings or orientations. A DEI related educational session was part of <i>at least</i> 2 out of 4 council meetings/orientation each calendar year.	Met	Broaden stakeholder engagement

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<p>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>	<p>Land acknowledgement statement developed and communicated during Council meetings. Land acknowledgement statement is part of the agenda for all Committee meetings of the College and to be recited by the Committee/Panel chair.</p> <p>Enhancing DEI is a strategic priority laid out in the College’s Strategic Plan 2022-2025.</p> <p>To understand which issues are pertinent, the following was undertaken:</p> <ul style="list-style-type: none"> Created and distributed a two-question survey to registrants re: DEI issues important to them and areas in which they would like College guidance. This was shared via the monthly newsletter in early 2024. 	<p>Met</p>	<p>Broaden stakeholder engagement (applies to the initiative related to the polling of members)</p>
<p>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)</p>	<p>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).</p>	<p>Partially Met</p>	<p>Constructively implement governance reform</p>

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	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)	Poll/survey will be developed for members --- <i>see initiative listed under item 2(b)</i>	Partially met	
b. Assessments and surveys take into account issues such as language, education levels, and accessibility. (Corresponding Global DEI Benchmark 8.14)	Council provides feedback on DEI sessions that were part of their meetings or orientation.		

<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>2024 Annual renewal includes an optional survey regarding Indigenous identification that will help the College to gain an understanding of the number of Indigenous optometrists currently practicing in Ontario. In support of the Truth and Reconciliation Commission’s Calls to Action 18 to 24, which include a call to increase “the number of Aboriginal professionals working in the health-care field” and ensure “the retention of Aboriginal health-care providers in Aboriginal communities,” the College asked this self-identification question to its registrants.</p>	<p>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. In April 2024, using the HPRO EDI Organizational Self-Assessment and Action Guide, the College conducted an Equity Impact Assessment.</p>	<p>Partially 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 was created and made available on the College’s DEI webpage that will allow visitors to input their thoughts.</p>	<p>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 staff meetings DEI issues, initiatives, and resources are discussed openly.</p>	<p>Partially 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>We explored what extensions exist that will allow visitors to our website to translate the Public webpages to the 5 most spoken languages in Ontario but didn’t find any suitable options that would also guarantee accuracy.</p> <p>Implemented a digital accessibility tool to enhance our website’s usability for people with various disabilities.</p>	<p>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>A DEI Resource webpage was created and contains resources for optometrists/public, and links to relevant external literature.</p>	<p>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 educated its registrants by sharing case scenarios and how to address DEI issues that may arise in the optometric profession in a respectful manner.</p>	<p>Partially 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>The June 2022 newsletter contained an update on DEI initiatives that the College had recently undertaken. Council is appraised of DEI accomplishments as they are achieved.</p>	<p>Partially met and ongoing</p>	

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<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>All staff participated in a plain language training workshop in 2023.</p>	<p>Met</p>	
<p>i. The Optometric Practice Reference (OPR) communicates to members the College's DEI expectations with regard to their interactions with patients.</p>	<p>As part of the OPR modernization project, DEI principles were considered.</p>	<p>Partially met</p>	

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 2(a)</i></p> <p>For Truth and Reconciliation Week (September 23-27, 2024), we shared resources on our DEI webpage that focused on Indigenous history and reconciliation & made various social media posts.</p>	Partially met	
<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 was delivered to the Quality Assurance Committee and the ICRC during their meetings in April 2023 and to the Discipline Committee at their orientation in 2025.</p>	Partially Met	

<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>Staff are encouraged to share and showcase their different cultural celebrations and/or practices during staff meetings.</p> <p>Cuisines from different parts of the world were tried as part of a team building activity in 2023.</p>	<p>Partially 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>DEI related case studies were shared in the monthly newsletters to members. This included complex clinical scenarios such as dealing with a patient with a disability.</p>	<p>Met</p>	<p>Broaden stakeholder engagement</p>

7) EXTERNAL EFFORTS

Objective/Benchmark	College Project or Initiative	Current Status	Overlap with another strategy
<p>a. The College uses the services of organizations/vendors that align with our DEI values. (Corresponding Global DEI Benchmark 15.4 and 15.7)</p>	<p>When retaining the services of external individuals or organizations, the College actively sought out those that align with our DEI values.</p>	<p>Met</p>	
<p>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)</p>	<p>Staff from the College’s DEI Working Group participated in HPRO’s Anti-Racism in Health Regulation project-implementation workshop for EDI tools in June 2023.</p> <p>The College partnered with the College of Opticians to participate in an Indigenous Engagement Session focused on improving eyecare for Indigenous patients.</p>	<p>Met</p>	<p>Broaden stakeholder engagement</p>
<p>c. The public understands that the College is available to receive feedback and complaints related to any discriminatory interactions they experience.</p>	<p>In the DEI webpage on the College’s website, it is noted that the College/ICRC has jurisdiction and authority to investigate complaints of such nature.</p>	<p>Met</p>	<p>Broaden stakeholder engagement</p>

<p>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.</p>	<p>College will target secondary school students in low-income neighborhoods around Ontario to increase awareness of the profession and increase understanding of the regulation of optometrists (opportunity to partner with University of Waterloo and/or the OAO). Presentations will be given to students in grade 10/11.</p> <p>The College looked into opportunities to be present at university fairs and found it not to be a suitable option.</p> <p>A video campaign on the optometry profession will be created.</p>	<p>Partially met and ongoing</p>	<p>Broaden stakeholder engagement</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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