



**Council**  
**3 May 2018**  
**Equality and Diversity Policy update**

<b>Classification</b>	Public
<b>Purpose</b>	For decision
<b>Issue</b>	The report summarises work undertaken in relation to equality and diversity in 2017-18 and presents an updated Equality and Diversity Policy for the organisation.
<b>Recommendations</b>	<ol style="list-style-type: none"><li>1. To consider the update on equality and diversity activities at Annex A.</li><li>2. To agree the updated Equality and diversity Policy at Annex B.</li><li>3. To note the development of the new Equality and Diversity Impact Assessment template at Annex C.</li></ol>
<b>Financial and resourcing implications</b>	None
<b>Equality and diversity implications</b>	Contained in the report
<b>Communications implications</b>	None
<b>Annexes</b>	<ol style="list-style-type: none"><li>A. Report on key activities in 2017-18</li><li>B. Equality and Diversity Policy 2018</li><li>C. Equality and Diversity Impact Assessment template</li></ol>
<b>Author</b>	Tim Walker

## Background

1. The General Osteopathic Council is listed in Schedule 19 to the Equality Act 2010 and is subject to the general equality duty outlined in s149 of the Equality Act 2010 which states that: 'In the exercise of their functions, public authorities in England, Scotland and Wales must have due regard to the need to:
  - a. Eliminate unlawful discrimination, harassment and victimisation and any other unlawful conduct in the Equality Act 2010.
  - b. Advance equality of opportunity
  - c. Foster good relations.
2. Section 40A(1)(a) of the Osteopaths Act requires Council to include within its Annual Report laid before Parliament, a description of the arrangements put in place to ensure that it adheres to good practice in relation to equality and diversity matters.
3. Each year Council receives a report on the GOsC's key activities relating to equality and diversity that have taken place in the previous year. The purpose of this report is to provide assurance about compliance with our legal duties and good practice in promoting equality and valuing diversity, and ensuring that both our work as a regulator and engagement with stakeholders is inclusive and free from discrimination.

## Discussion

4. Promoting equality and valuing diversity matters are those which should be integral to our policies, but also in the way that we implement them which means that staff thinking about and integrating the principles of promoting equality and valuing diversity, and monitoring and evaluating impact form a key component of effectiveness. The activities in this paper have sought to consider policies and processes and implementation mechanisms including ongoing monitoring.

### *Annual Report*

5. The report on key activities in 2017-18 is attached at Annex A and sets out in broad terms the major activities relating to equality and diversity that have taken place during the year.

### *Updating the Equality and Diversity Policy*

6. The current GOsC Equality and Diversity Policy has been in place since May 2015 and be found at: <http://www.osteopathy.org.uk/about-us/our-work/equality-and-diversity/>.

7. The current Policy was agreed by Council in May 2015. In March 2017 a minor amendment to the law was made (the Equality Act 2010 (Specific Duties and Public Authorities Regulations) 2017). This meant that for the first time that the GOsC was 'designated' in the list of bodies formally required to meet the 'Public Sector Equality Duty'. We have always acted as if this were the case and it will make no substantial difference to our approach.
8. Most of the other healthcare professional regulators have updated their equality and diversity policies since 2015 and we have reviewed their policies and activities in order to identify best practice and amend our approach.
9. The updated policy incorporates the following changes:
  - a. Including in an introductory statement our statutory duties and a statement of commitment to equality and diversity
  - b. Revised objectives:
    - i. Referring to our 'regulatory activities' rather than 'framework'
    - ii. Referring explicitly to 'standards' rather than 'professional values'
    - iii. Including communication and engagement as a specific objective
    - iv. Bringing together recruitment and development of staff and non-executives into one objective
  - c. In the monitoring, evaluation and ongoing reporting arrangements, making explicit the role of the Chief Executive and Registrar in relation to the policy, and clarifying annual reporting requirements.
10. The key themes and related activities remain largely unchanged from the current policy.

#### *Equality impact assessments*

11. In our activity plan for 2017-18 we committed to reviewing the template we use for undertaking equality impact assessments (EIAs).
12. We looked at our current template, the one used by the Department of Health (which we are, on occasions, required to complete) and a model template provided by a consultant with whom we work regularly.
13. The resulting revised template is provided at Annex C for information.

#### **Recommendations:**

1. To consider the update on equality and diversity activities at Annex A.
2. To agree the updated Equality and diversity Policy at Annex B.

3. To note the development of the new Equality and Diversity Impact Assessment template at Annex C.

**Report on Activities in 2017-18**

<b>Equality and diversity theme</b>	<b>Main activities</b>	<b>Commentary</b>
1. Service provision	A. We will ensure that information is available in accessible formats, whether in hard copy or online.	<p>This is an ongoing commitment and we ensure that all documents intended for external use are offered in accessible formats (see <a href="http://www.osteopathy.org.uk/news-and-resources/publications/">http://www.osteopathy.org.uk/news-and-resources/publications/</a>)</p> <p>Our register is available online and we answer registration queries by telephone for those who cannot access the Register online. We have information about accessibility on the website and we aim to meet level 2. (See <a href="http://www.osteopathy.org.uk/accessibility/">http://www.osteopathy.org.uk/accessibility/</a>)</p> <p>We are commencing a review of website content and our style guide and will seek to incorporate high standards of accessibility and readability.</p> <p>Learning resources and materials for the new CPD scheme – we have ensured that all osteopaths wishing to access webinars as part of the CPD scheme have the opportunity for additional support if required to ensure equality of access for all. This has included bespoke 1:1 support sessions (including provision of sessions in the early morning or late evening to take account of caring and other responsibilities or where osteopaths are based), staff with training in a range of diverse learning styles and redesign of materials to ensure best practice in use of fonts and colours to enhance accessibility.</p>
	B. We will ensure that Osteopathy House and GOsC’s external events are accessible.	<p>This is an ongoing commitment and premises and accessibility for the premises is maintained, including a hearing loop for use in the Council Chamber.</p> <p>We will be introducing new technology to support hearings and other meetings in 2018-19.</p> <p>Whilst ensuring that we anticipate the needs of our Visitors, we also</p>

		encourage Visitors to let us know if they have specific needs for each meeting, so that we can ensure accessibility for all for example in the particular lay out of rooms for meetings, and ensuring particular chairs are available.
	C. We will ensure that complainants and witnesses are effectively supported through the fitness to practise process.	We provide comprehensive guidance for all participants in fitness to practise hearings, whether they are witnesses or registrants. New guidance for registrants was published in spring 2017.
	D. We will meet our duties under the Welsh Language Act.	We submitted our annual monitoring report to the Welsh Language Commissioner in October 2017 following the Annual Report to Council in July 2017.  This year our initiatives in this area have included reorganising the Welsh information on our website to make the section easier to use and producing new information for Welsh registrants on the resources that we can provide in Welsh. Our register now includes eight practices where the Welsh language can be used with patients.
2. Policy development and implementation	A. We will assess the equality and diversity implications of all new work.	This is an ongoing activity in which review of new policy proposals is undertaken to assess whether equality and diversity implications are reflected in the proposals, and additional equality impact assessment is undertaken if required (see below). We also give specific consideration within our equality and diversity template to ensuring that consultation and engagement mechanisms are thought through from the perspective of our stakeholders ensuring that all can participate in consultations. Ongoing implementation is also outlined in our equality impact assessment so that impact is monitored over time.  A new template has been developed for producing equality and diversity impact assessments to ensure a consistency of approach for both of these matters.

	<p>B. We will publish formal equality impact assessments on all major projects.</p>	<p>These major areas of work involved significant consideration of equality impact.</p> <ol style="list-style-type: none"> <li>1. Charges payable by internationally qualified applicants – an equality and diversity impact assessment was produced for this consultation on changes to charges for international applicants.</li> <li>2. CPD scheme – the equality and diversity impact assessment was updated and submitted to the Department of Health along with the draft revised CPD rules.</li> <li>3. <i>Osteopathic Practice Standards</i> review – an equality and diversity impact assessment was prepared and considered by the Policy Advisory Committee and Council.</li> </ol>
	<p>C. We will seek to ensure that our consultations, surveys and research projects address equality and diversity issues, and that there is an appropriate diversity of respondents.</p>	<p>We undertook eight consultations in 2017-18:</p> <ul style="list-style-type: none"> <li>• Hearings and Sanctions Guidance</li> <li>• Consensual disposal using Rule 8</li> <li>• <i>Osteopathic Practice Standards</i></li> <li>• Amendments to the CPD rules</li> <li>• Charges payable by internationally qualified applicants</li> <li>• CPD and Peer Discussion Review Guidance (ongoing)</li> <li>• Investigating Committee Decision-making Guidance (ongoing)</li> <li>• Quality Assurance of osteopathic education (ongoing)</li> </ul> <p>Consultation responses were sought in a number of different ways to maximise participation, and equality and diversity implications were considered as part of the consultation process. We seek to enable stakeholders to feel that they are able to contact us if they have any accessibility needs in terms of consultations.</p>

<p>3. Data collection and analysis</p>	<p>A. We will collect and record relevant equality and diversity data systematically from new registrants in order to understand the profile of our registrants.</p>	<p>This is an ongoing activity in relation to new registrants and arises also as part of the CPD Evaluation Survey.</p>
	<p>B. We will collect and record equality and diversity data from those we interact with, including: respondents to consultations and research surveys; and complainants and others involved in fitness to practise proceedings.</p>	<p>This is an ongoing commitment in relation to consultation responses and research surveys. We will look to evaluate the diversity of those responding to our consultations where possible.</p>
	<p>C. We will collect and record equality and diversity data on all applicants and appointees to non-executive and executive posts.</p>	<p>This exercise was completed in relation to the small number of Committee appointments made in 2017-18.  All of this information was analysed and reported to the Remuneration and Appointments Committee.  We continue to collect equality and diversity data on all applicants and appointees to the staff team and we have undertaken a survey about protected characteristics to ensure that we have up to date information about the whole staff team.  This information helps us to appreciate our staff and to ensure that we are doing all we can to promote equality and value diversity in the work place and to do all that we can to ensure that our staff reflect the diverse nature of our stakeholders. Further information on this is set out below.</p>



	<p>D. We will analyse data collected through these processes and ensure that it is used to inform the equality and diversity aspects of our work.</p>	<p>In relation to non-executive appointments, although there was only a small number of appointees, the gender diversity was 3:1 female to male, and the age profile was younger than in previous campaigns. We also undertook a survey of past registrant applicants in order to identify any barriers within the application process.</p>
<p>4. Partnerships and the implementation/promotion of standards</p>	<p>A. We will seek to work in partnership with others to ensure best practice in equality and diversity (for example, with the osteopathic educational institutions and others in the implementation of the <i>Osteopathic Practice Standards</i>).</p>	<p>We commissioned research (jointly with the General Chiropractic Council) about osteopathy, touch and communication, and we expect that any follow-up work will take account of equality and diversity implications as part of this research for further consideration and dissemination.</p> <p>Our standard contracts with partners include obligations relating to our equality and diversity duty.</p>
	<p>B. We will seek to ensure that equality and diversity considerations are taken into account in any projects undertaken jointly with others (for example, with our Osteopathic Development Group partners on development projects).</p>	<p>We continue to highlight to ODG partners the importance of recognising equality and diversity aspects of ODG projects. Again we were pleased to note that once again the majority of participants in the Leadership Programme were female.</p>

<p>5. Employment and governance</p>	<p>A. We will ensure that our HR policies are up to date and represent best practice in equality and diversity, and we will monitor their effects on staff recruitment and retention.</p>	<p>Recruitment in 2017-18 has successfully maintained a diverse profile within the GOsC staff team.</p> <p>We have undertaken a survey about protected characteristics to ensure that we have up to date information about the whole staff team.</p> <p>We have a range of flexible working policies in place to ensure that staff are provided with equal opportunities to undertake their work.</p>
	<p>B. We will ensure that all non-executives and executives receive appropriate and regular equality and diversity training.</p>	<p>Equality and diversity will be incorporated into the training for new non-executives from 1 April 2018. We will aim to refresh our training for staff in 2018-19.</p>
	<p>C. We will seek to improve the diversity of applicants and appointees to non-executive roles.</p>	<p>As noted above, some aspects of the diversity profile of appointees improved. The Remuneration and Appointments Committee has agreed to explore further best practice in this area before any new appointment processes commence.</p>
	<p>D. We will keep ourselves up to date and share best practice in equality and diversity through our participation in the joint regulators' equality and diversity forum.</p>	<p>Members of the Executive continue to attend the regular meetings of the equality and diversity forum.</p> <p>A member of the Executive also attends a recently established LGBT inter-regulatory group.</p> <p>We have also contributed to a GMC project considering how equality and diversity impact in its regulatory activities.</p>

### Equality and Diversity Policy 2018

#### Introduction

1. The General Osteopathic Council is the independent statutory regulator for the osteopathy profession in the UK. The over-arching objective of the GOsC is the protection of the public. This involves the pursuit of the following objectives:
  - a. Protecting, promoting and maintaining the health, safety and well-being of the public
  - b. Promoting and maintaining public confidence in the profession of osteopathy, and
  - c. Promoting and maintaining proper professional standards and conduct for members of that profession.
2. The GOsC believes that equality and diversity is integral to our work, and we recognise that taking account of different needs and perspectives to those we serve brings strength and opportunity to what we do.
3. We will behave consistently and fairly towards everyone we work with, valuing and respecting their views and interests, and we will seek to eliminate any activities that may result in discrimination or exclusion based on individual characteristics.
4. We expect our staff and non-executives to be committed to promoting equality, valuing diversity, and meeting our equality duties and the objectives of this policy.

#### Legal duties

5. The General Osteopathic Council is a designated public authority and is subject to the public sector equality duty under the Equality Act 2010 (the Act). In the exercise of its functions the GOsC must have due regard to the need to:
  - a. Eliminate unlawful discrimination, harassment, victimisation and other conduct that is prohibited by the Act
  - b. Advance equality of opportunity between people who share a protected characteristic<sup>1</sup> and those who do not
  - c. Foster good relations between people who share a relevant protected characteristic and those who do not.

---

<sup>1</sup> The relevant protected characteristics are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. The protected characteristics of marriage and civil partnership are only relevant to (a) above.

6. Having due regard means the GOsC must think consciously and carefully about these three aims in its day-to-day work, so that equality issues influence its decisions in developing policy, in delivering services, and in its role as an employer. It has to do this in a proportionate way, focusing more attention on functions that have the most impact on different groups of people. It has this duty even if a third party carries out the function on its behalf.
7. Advancing equality of opportunity involves having due regard to the need to:
  - a. Remove or minimise disadvantages experienced by people due to their protected characteristics
  - b. Take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
  - c. Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.
8. Complying with the duty may involve treating some people differently. The duty recognises that the needs of people who have a disability are different from the needs of others. This may mean making reasonable adjustments or treating people with a disability who are disabled more favourably than people who aren't disabled – for example, though positive action to help them participate more fully.
9. Having due regard to the need to foster good relations involves having due regard to the need to tackle prejudice and promote understanding.
10. In addition to its duties under the Equality Act, as a UK-wide body, the GOsC has legal duties under the Welsh Language Act 1993, set out in our Welsh Language Scheme, which can be found at <http://www.osteopathy.org.uk/about-us/our-work/welsh-language-scheme/>

### Objectives

11. The GOsC's objectives in respect of equality and diversity are to:
  - Ensure our regulatory activities are fair and free from unlawful discrimination
  - Ensure that promoting equality and valuing diversity are reflected in the standards we set for the osteopathy profession
  - Promote equality of opportunity and access to the osteopathy profession
  - Communicate and engage with a diverse range of stakeholders in an accessible manner
  - Ensure high standards of in the recruitment, development and ongoing work of staff and non-executives.

### **How we will meet our objectives**

12. While the equality duty is relevant to all of our work, we have identified five key areas or 'themes' where we will focus our work on equality and diversity. These key themes and the associated activities are set out in the table below.

### **Monitoring and reporting**

13. The Chief Executive and Registrar is responsible for ensuring that this policy is implemented and that equality and diversity is integral to the organisation's work.
14. Council has overall responsibility for ensuring that the GOsC meets its statutory duties under the Act. Council will consider a report on equality and diversity matters each year, including our performance against this policy and on specific equality and diversity projects undertaken within the previous twelve months.
15. This policy will be reviewed by Council at least once in the period of each Corporate Strategy.
16. In its Annual Report to Parliament, the GOsC will report on the arrangements that the GOsC has put in place to ensure that it applies good practice in relation to equality and diversity, as required by section 40A(1)(a) of the Osteopaths Act 1993.

<b>Equality and diversity theme</b>	<b>Main activities</b>	<b>Senior responsible owner(s)</b>
1. Service provision	A. We will ensure that information is available (or can be made available) in accessible formats, whether in hard copy or online.	Head of Communications and Engagement
	B. We will use a wide variety of channels to communicate and engage with a diverse range of stakeholders.	Head of Communications and Engagement
	C. We will ensure that Osteopathy House and any GOsC external events are accessible.	Head of Communications and Engagement and Director of Registration and Resources
	D. We will ensure that complainants and witnesses are effectively supported through the fitness to practise process.	Director of Fitness to Practise
	E. We will meet our duties under the Welsh Language Act.	Head of Communications and Engagement
2. Policy development and implementation	A. We will assess the equality and diversity implications of all new policy development and operational activities.	Chief Executive
	B. We will publish formal equality impact assessments on all major projects.	Chief Executive
	C. We will seek to ensure that our consultations, surveys and research projects address equality and diversity issues, and that there is an appropriate diversity of respondents.	Head of Communications and Engagement with all relevant policy leads

3. Data collection and analysis	A. We will collect and record relevant equality and diversity data systematically from new registrants in order to understand the profile of our registrants.	Director of Registration and Resources
	B. We will collect and record equality and diversity data from those we interact with including: respondents to consultations and research surveys; and complainants and others involved in fitness to practise proceedings.	Head of Communications and Engagement and Head of Regulation
	C. We will collect and record equality and diversity data on all applicants and appointees to non-executive and executive posts.	Chief Executive and HR Manager
	D. We will analyse data collected through these processes and ensure that it is used to inform the equality and diversity aspects of our work.	All senior responsible owners
4. Partnerships and the implementation/ promotion of standards	A. We will seek to work in partnership with others to ensure best practice in equality and diversity (for example, with the osteopathic educational institutions and others in the implementation of the <i>Osteopathic Practice Standards</i> ).	Director of Education, Standards and Development
	B. We will seek to ensure that equality and diversity considerations are taken into account in any projects undertaken jointly with others (for example, with our Osteopathic Development Group partners on development projects).	Chief Executive

<p>5. Employment and governance</p>	<p>A. We will ensure that our HR policies are up to date and represent best practice in equality and diversity, and we will monitor their effects on staff recruitment and retention.</p>	<p>Chief Executive and HR Manager</p>
	<p>B. We will ensure that all non-executives and executives receive appropriate and regular equality and diversity training.</p>	<p>Director of Fitness to Practise and HR Manager</p>
	<p>C. We will seek to improve the diversity of applicants and appointees to non-executive roles.</p>	<p>Chief Executive and HR Manager</p>
	<p>D. We will keep ourselves up to date and share best practice in equality and diversity through our participation in the joint regulators' equality and diversity forum.</p>	<p>Director of Fitness to Practise</p>



## **Equality Impact Assessment Template**

### **Step 1 – Scoping the EIA**

<b>Title of policy or activity</b>	
<b>Is a new or existing policy/activity?</b>	
<b>What is the main purpose and what are the intended outcomes of the policy/activity?</b>	
<b>Who is most likely to benefit or be affected by the policy/activity</b>	
<b>Who is doing the assessment?</b>	
<b>Dates of the EQIA</b>	
• When did it start?	
• When was it completed?	
• When should the next review of the policy/activity take place?	

### **Useful information**

<b>What information would be useful to assess the impact of the policy/activity on equality?</b>
<b>Is there data relating to people with any/each of the protected characteristics?<sup>2</sup></b>
<b>Where can we get this information and who can help?</b>

<sup>2</sup> The nine protected characteristics in the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

**Step 2 – Involvement and consultation**

**If you have involved stakeholders, briefly describe what was done, with whom, when and where. Please provide a brief summary of the response gained and links to relevant documents, as well as any actions.**

--

**Step 3 – Data collection and evidence**

**What evidence or information do you already have about how this policy might affect equality for people with protected characteristics under the Equality Act 2010?**

Please cite any quantitative (such as statistical data) and qualitative (such as survey data, complaints, focus groups, meeting notes or interviews) relating to these groups. Describe briefly what evidence you have used.

--

**What additional research or data is required to fill any gaps in your understanding of the potential or known effects of the policy? Have you considered commissioning new data or research?**

--

**Step 4 – assessing impact and strengthening the policy**

**What does the data reviewed tell us about the people the policy/activity affects, including the impact or potential impact on people with each/any of the protected characteristics?**

--

**Are there any implications in relation to each/any of the different forms of discrimination defined by the Equality Act?**

--

**What practical changes will help to reduce any adverse impact on particular groups?**

--

**What could be done to improve the promotion of equality within the policy?**

--

**Step 6 – making a decision**

**Summarise your findings and give an overview of whether the policy will meet the GOsC’s objectives in relation to equality.**

--

**What practical actions do you recommend to reduce, justify or remove any adverse/negative impact?**

--

**What practical actions do you recommend to include or increase potential positive impact?**

--

**Step 6 – monitoring, evaluation and review**

**How will you monitor the impact/effectiveness of the policy/activity?**

--

**What is the impact of the policy/activity over time?**

--

**Where/how will this EIA be published and updated?**

--

**Step 7 – action planning**

**Please detail any actions that need to be taken as a result of this EIA**

Action	Owner	Date