



To: Council

From: Leonie Milliner, Chief Executive

Date: 17 July 2019 **Paper:** C19/030

Equality and Diversity Policy Report

Classification Public

Purpose For noting

Issue This report summarises work undertaken in relation

to equality and diversity from 1 April 2018 – 31

March 2019.

Recommendations To note the report.

Financial and resourcing

implications

None

Equality and diversity

implications

Contained in the report

Communications

implications

None

Annexes Annex A: Report on key activities in FY 2018-19

Annex B: GOsC Equality & Diversity Policy

Annex C: Extract; PSA Performance Review

Standards (2018)

Annex D: New Registrants E&D data

Annex E: CPD Evaluation 2019 E&D data

Annex F: 2019 Non-Executive Appointments E&D

data

Introduction

- 1. At its meeting on 3 May 2018 Council approved an updated GOsC Equality and Diversity Policy. It also noted an updated equality impact assessment (EIA) template and the 2017-18 Equality & Diversity report. A copy of the updated Equality and Diversity policy is attached at Annex B.
- 2. The Equality and Diversity policy requires Council to consider each year a report on equality and diversity, including performance against the policy within the previous 12 months. The purpose of the annual report is to provide assurance to Council about compliance with our legal duties and good practice in promoting equality and valuing diversity, and ensuring that our work as a regulator and our engagement with stakeholders is inclusive and free from discrimination.
- 3. In addition, Council should be aware that the new PSA 'Performance Review Standards for Good Regulation (2018)' now includes a new Standard, Standard 3, which relates to equality & diversity.
 - 'Standard 3: The regulator understands the diversity of its registrants and their patients and service users and of others who interact with the regulator and ensures that its processes do not impose inappropriate barriers or otherwise disadvantage people with protected characteristics.'
- 4. It is our intention to participate in a pilot of this Standard from July September 2019, in preparation for reporting against all the new Standards, including Standard 3, in our next PSA review period (2019-20). A copy of the self-assessment for Standard 3, Equality and Diversity, is included at Annex C.

Background

- 5. The GOsC 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.
- 6. 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.

Annual Report

7. The report on equality and diversity activity in 2018-19 is attached at Annex A. The report sets out in broad terms the major activities relating to equality and diversity that have taken place during the year, as required in the GOsC Equality and Diversity Policy. Council is asked to note this report.

Recommendations:

- 1. To note the equality and diversity report at Annex A.
- 2. To note the updated Equality and Diversity Policy at Annex B.
- 3. To note the PSA Performance Review Standards (2018) Standard 3, Equality and Diversity self-assessment form, at Annex C

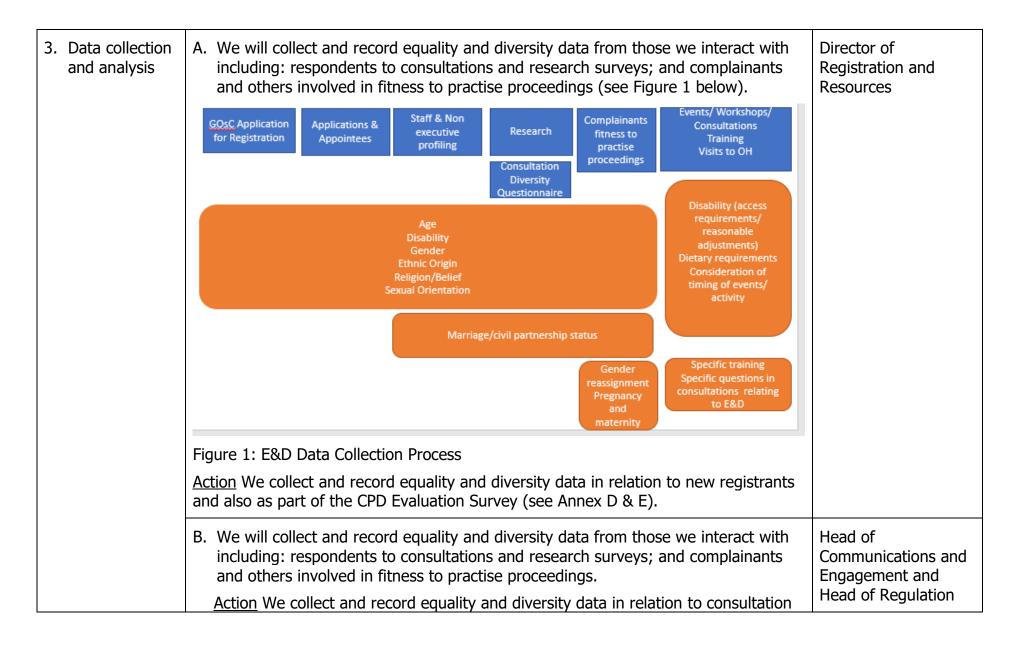
Report on Activities in 1 April 2018-31 March 2019

Equality and diversity theme	Main activities	Senior responsible owner(s)
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
	<u>Action</u> We ensure all documents intended for external use are offered in accessible formats (see <u>osteopathy.org.uk/news-and-resources/publications</u>), including posting out of printed copies of online materials where requested.	Engagement
	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 osteopathy.org.uk/accessibility)	
	We seek to incorporate in our website high standards of accessibility and readability.	
	Learning resources and materials to support our new CPD scheme have been designed to meet a range of learning styles and draw upon best practice in use of typefaces, fonts and colours to enhance accessibility. We have made additional support available to all osteopaths if required to ensure equality of access for all, including bespoke 1:1 support sessions and provision in the early morning or late evening to take account of caring and other responsibilities or geographical location. Information about the scheme has been conveyed in a number of different ways, including visual representations (partly in response to a specific comment by a registrant with dyslexia within a reader's survey we carried out).	
	We have updated our house style guidelines to no longer allow the use of italics online as italics are not accessible. We also recommend typefaces/sizes for documents and emails based on accessibility.	

E	We carried out a brand refresh where we encouraged the use of contrasting colours and typefaces to ensure accessibility. Our monthly news ebulletin is created in plain text as well as html, which allows people with screen-readers to choose the accessible option. Over the past year we have ensured that we utilise images (photos and illustrations) to reflect diversity in our magazine and other GOsC communications. Information has been conveyed in several different ways, including visual representations in response to readers' survey (e.g. someone with dyslexia who responded to the first readers' survey) Hard copy materials in various formats sent out to people with sight loss 3. We will use a wide variety of channels to communicate and engage with a diverse range of stakeholders. Action We utilise our own channels including our bi-monthly print magazine The Osteopath, monthly news ebulletins, websites and social media. Plus we carry out face-to-face communication and engagement at events, regional group sessions and through webinars. We also communicate through stakeholder channels such as the Institute of Osteopathy's magazine and e-newsletter, plus via educational provider, regional group leads and other stakeholder channels. We also produce a	Head of Communications and Engagement
	provider, regional group leads and other stakeholder channels. We also produce a variety of publications and other resources.	
	C. We will ensure that Osteopathy House and any GOsC external events are accessible.	Director of Registration and Resources
	<u>Action</u> Ongoing commitment to maintain accessibility, including a hearing loop for use in the Council Chamber.	Resources
	In 2018-19 we introduced new technology to support hearings and other meetings,	

	including a new microphone system which will aid those with hearing or speaking difficulties, and new video conferencing technology, including a large screen TV. Whilst ensuring that we anticipate the needs of our visitors, we also 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 layout of rooms and making particular chairs available.	
	D. We will ensure that complainants and witnesses are effectively supported through the fitness to practise process.	Director of Fitness to Practise
	<u>Action</u> We provide comprehensive guidance for all participants in fitness to practise hearings, whether they are witnesses or registrants.	
	Guidance for witnesses: https://www.osteopathy.org.uk/standards/complaints/hearings/attending-a-hearing/witness-guidance/	
	Guidance for registrants: https://www.osteopathy.org.uk/news-and-resources/publications/guidance-for-osteopaths/	
	E. We will meet our duties under the Welsh Language Act. <u>Action</u> We will submit our annual monitoring report to the Welsh Language Commissioner following the Annual Report to Council in July 2019.	Head of Communications and Engagement
	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 20 practices where the Welsh language can be used with patients.	
2. Policy development	A. We will assess the equality and diversity implications of all new policy development and operational activities.	Chief Executive

and implementation	Action In the reporting period no equality and diversity impact assessments were undertaken.	
	B. We will publish formal equality impact assessments on all major projects.	Chief Executive
	<u>Action</u> In the reporting period one equality and diversity impact assessment was published:	
	https://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/pac-march-2018-item-4e-annex-e-osteopathic-practice-standards/	
	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
	Action In the reporting period we undertook the following public consultations:	relevant policy leads
	Continuing Professional Development and Peer Discussion Review Guidance	
	Investigating Committee Decision-Making Guidance	
	Changes to the quality assurance of osteopathic education	
	Standard Case Directions	
	Cancellation of hearing under Rule 19	
	In all our consultations we seek to involve not just registrants but a full range of stakeholders, using a range of approaches including written consultation, focus groups and one-to-one meetings.	
	This year, we have undertaken a significant amount of engagement with our stakeholders, including both in local face-to-face meetings across the country and through online webinars, to help embed and support practice in accordance with our standards.	



			responses and the CPD Evaluation survey (see Annex E). We publish a diversity form alongside the consultation questions. These diversity forms state that they should be completed and then sent to the team concerned.	
		C.	We will collect and record equality and diversity data on all applicants and appointees to non-executive and executive posts. Action We collect and record equality and diversity data in relation to staff and	Chief Executive and HR Manager
		D.	non- executive applications and appointments (see Annex F) We will analyse data collected through these processes and ensure that it is used to inform the equality and diversity aspects of our work. Action Data collected is analysed and reflected upon/ used at departmental and/or committee level to inform the purpose for which is was collected (see Annex F)	All senior responsible owners
an	artnerships nd the nplementation	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 Osteopathic Practice Standards).	Director of Education, Standards and Development
	romotion of andards		<u>Action</u> In 2018-19 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 for further consideration and dissemination.	
			Our standard contracts with partners include obligations relating to our equality and diversity duty.	
		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 (ODG) partners on development projects).	Chief Executive
			We continue to work with ODG partners including on the importance of recognising equality and diversity aspects of ODG projects.	

5. Employment and governance	 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. Action We have a range of flexible working policies in place to ensure that staff are provided with equal opportunities to undertake their work. Remuneration and Appointments Committee receive an annual report on equality and diversity, and actively monitor staff recruitment and retention. 	Chief Executive and HR Manager
	 B. We will ensure that all non-executives and executives receive appropriate and regular equality and diversity training. Action In the reporting period the following equality and diversity training was offered: PCC/IC mandatory EDI induction/ training for new members 	Director of Fitness to Practise and HR Manager
	C. We will seek to improve the diversity of applicants and appointees to non-executive roles. <u>Action</u> in this area is ongoing.	Chief Executive and HR Manager
	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. Action Members of the executive continue to attend the regular meetings of the joint regulators' equality and diversity forum. A member of the executive also attends the LGBT inter-regulatory group.	Director of Fitness to Practise

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 characteristic¹ and those who do not
 - c. foster good relations between people who share a relevant protected characteristic and those who do not.
- 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

¹ 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.

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
 - 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 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.

Equality and diversity theme	Main activities	Senior responsible owner(s)
6. Service provision	F. 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
	G. We will use a wide variety of channels to communicate and engage with a diverse range of stakeholders.	Head of Communications and Engagement
	H. We will ensure that Osteopathy House and any GOsC external events are accessible.	Head of Communications and Engagement
	I. We will ensure that complainants and witnesses are effectively supported through the fitness to practise process.	Director of Fitness to Practise
	J. We will meet our duties under the Welsh Language Act.	Head of Communications and Engagement
7. Policy development and implementation	D. We will assess the equality and diversity implications of all new policy development and operational activities.	Chief Executive
	E. We will publish formal equality impact assessments on all major projects.	Chief Executive
	F. 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

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8. Data collection and analysis	E. 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
	F. 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
	G. 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
	H. 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
9. Partnerships and the implementation/ promotion of standards	C. 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 Osteopathic Practice Standards).	Director of Education, Standards and Development
	D. 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

10. Employment and governance	E. 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.	Chief Executive and HR Manager
	F. We will ensure that all non-executives and executives receive appropriate and regular equality and diversity training.	Director of Fitness to Practise and HR Manager
	G. We will seek to improve the diversity of applicants and appointees to non-executive roles.	Chief Executive and HR Manager
	H. 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.	Director of Fitness to Practise

Extract from; PSA 'Performance Review Standards for Good Regulation (2018)' Standard 3, which relates to equality & diversity.

Standard 3; The regulator understands the diversity of its registrants and their patients and service users and of others who interact with the regulator and ensures that its processes do not impose inappropriate barriers or otherwise disadvantage people with protected characteristics.

This Standard comprises two elements: understanding the diversity of registrants and stakeholders; and ensuring processes do not impose inappropriate barriers.

Through the pilot we intend to gain a greater understanding of the data collected by regulators to assist in developing a baseline for this Standard. We recognise that regulators may have different processes and collect different data. An important element of this Standard will be the regulator's processes for reviewing the data and identifying issues (or looking for concerns which might arise in respect of new initiatives), and action taken in response to concerns that are identified and in addressing relevant concerns (for example, different requirements in Northern Ireland).

Data collected by the regulator (additional question to assist baseline development).

Please outline the equality and diversity data collected and held for registrants and others who interact with the regulator, and describe how this is used.

Attachment list:

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Data on the composition of committees and assessor pools, and how these compare with the wider population.

Please provide information on the composition of committees and assessor pools, and any consideration of these against the wider population.

Attachment list:

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Details of how the regulator ensures that its processes are free from bias, including data collection methods and other processes that ensure fairness and objectivity.

Please briefly outline processes in place and attach supporting reports and other documents.

Please outline the equality and diversity training provided to staff.

Attachment list:

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Actions taken by the regulator to address concerns about its processes.

Please provide examples of concerns and actions taken, and attach any supporting data, reports, analyses and other documents.

Attachment list:

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Examples of Equality Impact Assessments (EIA) undertaken by the regulator.

Please briefly outline the process for undertaking EIAs (including determining whether these are required) and attach supporting examples.

Attachment list:

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Details of how the regulator ensures that its processes are free from bias.

Please briefly outline the measures in place to assess processes for bias and attach supporting documents, including any analysis undertaken.

Attachment list:

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Annex D: New Registrants E&D data

	Joiners to the Register 1 Apr 2018-31 Mar 2019	Percentage (%)
Gender		
Male	117	45%
Female	144	55%
Ethnicity	I	
Asian or Asian British	4	2%
Black or Black British	1	0.4%
Chinese or any other East Asian ethnic group	6	2%
Mixed Ethnic Group	4	1.5%
White or White British	110	42%
Other	11	4%
Did not answer	125	48%
Sexuality		
Heterosexual	113	43%
Homosexual	4	2%
Bisexual	2	0.8%
Transsexual	-	-
Other	-	-
Did not answer	142	54%
Disability		·
Consider self as disabled	2	0.8%
No	259	99%
Religion		
Buddhist	3	1%
Hindu	6	2%
Jewish	-	-
Christian	42	16%
Muslim	3	1%
Sikh	1	0.4%
None	55	21%
Other	3	1%
Did not answer	148	57%

Annex E: Research - CPD Evaluation Survey 2019 E&D data

	Register Data (from KPMG)	2018-19			
Gender					
Male	49%	38%			
Female	51%	59%			
Prefer not to answer	N/A	2%			
Age					
30 or under	12%	9%			
31-40	27%	19%			
41- 50	37%	27%			
51-60	17%	32%			
61+	6%	10%			
Prefer not to say	Not recorded	3%			
Ethnicity					
White	82%	86%			
Mixed	1%	3%			
Asian or Asian British	5%	3%			
Black or Black British	1%	2%			
Chinese	-	0.3%			
Other	1%	1.5%			
Prefer not to say	8%	4%			
Sexuality					
Heterosexual	86%	82%			
Homosexual	3%	4%			
Bisexual	0.5%	1%			
Transsexual	-	-			
Other	0.5%	1%			
Prefer not to say	10%	12%			
Religion					
Christian	51%	33%			
Muslim	2%	1%			
Hindu	2%	1%			
Buddhist	1%	2%			
Sikh	-	0%			
Jewish	1%	3%			

Agenda item 12: Paper C19/010 Annex

None	41%	44%
Other	3%	5%
Prefer not to say	10%	12%
Living Arrangements		
Married	57%	54%
Civil Partnership	6%	1%
Single, never married	17%	10%
Separated/divorced	4%	6%
Widowed	1%	2%
Other	6%	16%
Prefer not to say	8%	10%
Disability	3%	2%
Prefer not to say	-	2%

Annex F: 2019 Non-Executive Appointments E&D data

	Total number	Percentage (%)
Gender		
Male	23	47%
Female	26	53%
Age		
35 and under	1	2%
36-45	7	14%
46-55	20	41%
56-65	15	31%
66+	4	8%
Prefer not to answer	2	%
Ethnicity		
Asian or Asian British	2	4%
Black or Black British	2	4%
Chinese or any other East Asian	0	0
ethnic group		
Mixed Ethnic Group	0	0
White or White British	45	92%
Other	0	0
Prefer not to answer	0	0
Sexuality		
Heterosexual	41	84%
Homosexual	1	2%
Bisexual	0	0
Transsexual	0	0
Other	0	0
Prefer not to answer	7	14%
Disability		
Consider self as disabled	5	10%
No	44	90%
Religion		
Buddhist	0	0
Hindu	2	4%
Jewish	2	4%

Agenda item 12: Paper C19/010 Annex

Christian	18	37%
Muslim	1	2%
Sikh	1	2%
None	14	29%
Other	0	0
Prefer not to answer	11	22%