



**Council**  
**20 July 2021**  
**Equality, Diversity and Inclusion Framework 2021-24 including Annual Report 2020-21**

**Classification** Public

**Purpose** For decision

**Issue** The paper presents the Equality, Diversity and Inclusion Framework 2021-24 for approval which has been updated to reflect feedback we have collected since the draft framework was published in February 2021.

The paper also presents our Annual Report to Council on the work we have undertaken on equality and diversity in the year 2020-21.

**Recommendation(s)**

1. To approve the Equality, Diversity and Inclusion Framework 2021-24.
2. To note the Equality, Diversity and Inclusion Annual Report 2020-21.

**Financial and resourcing implications** The cost of Equality, Diversity and Inclusion activities was factored into the budget which was approved by Council.

**Equality and diversity implications** These are set out in the paper.

**Communications implications** We will publish the Equality, Diversity and Inclusion Framework 2021-24 with a news article which will also reference the work outlined in the Annual Report 2020-21 set out at Annex B.

The new framework will be promoted through our social media channels.

**Annex(es)**

- A. Equality, Diversity and Inclusion Framework 2021-24
- B. Equality, Diversity and Inclusion Annual Report 2020-21

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**Key messages from the paper:**

- Council agreed to publish a Draft Equality, Diversity and Inclusion Framework 2021-24 in February 2021 and to seek feedback from stakeholders including patients and the public. Feedback has been collected and themed across the following areas:
  - Professional development
  - Underrepresentation
  - Inclusivity
  - External verification
  - Metrics, monitoring, actions and external communications
  - Detailed editing suggestions
- The Equality, Diversity and Inclusion Framework 2021-24 has been updated to reflect the feedback and is provided at Annex A for approval.
- We have amended text around one aim of the framework (Promoting equality changed to Promoting Equity); strengthened text within the framework, and we have added an action around signposting resources for the profession to use to consider EDI.
- Council also receives an annual equality, diversity and inclusion report and this is presented at Annex B. The report references our work on increasing the diversity of applications for non-executive vacancies; how we have considered equality and diversity as part of our CPD evaluation and the independent audit completed by an equality expert in 2020.

**Background**

1. The General Osteopathic Council (GOsC) is a designated public authority and is subject to the public sector equality duty under the Equality Act 2010.
2. Pre-pandemic Council had identified the need for the GOsC Equality and Diversity Policy to be enhanced. While the pandemic delayed our work, Audit Committee commissioned an independent audit which was completed in the autumn of 2020, with a final report presented in late 2020. This was considered in full by Audit Committee and the report was made available to Council members via DocMonster.
3. The report did not identify any breaches of the Equality Act 2010 and it made recommendations which led to the development of a draft Equality, Diversity and Inclusion Framework 2021-24, which Council considered in February 2020. The document was approved for publication so that the Executive could obtain feedback on the framework before it would be formally adopted by Council.

4. This paper sets out the feedback which was received and how the framework has been adapted in response to that feedback. The updated framework is set out at Annex A.
5. Additionally, Council receives an annual report on our activities over the last year on equality, diversity and inclusion. The annual report is set out at Annex B.

## Discussion

### *Draft Equality, Diversity and Inclusion (EDI) Framework 2021-24*

6. Feedback was received from a diverse range of stakeholders including other regulators, registrants, patients and members of the public via written responses, dedicated focus groups and interviews between February and June 2021. A range of protected characteristics from respondents were declared.
7. Feedback collected from all channels is aggregated below.

<b>Feedback</b>	<b>Response</b>
<p><b>Theme: Professional development</b></p> <p>To what extent can the framework be used to help the development of the profession, such as GOsC using its position and the framework to raise awareness, knowledge and understanding of EDI issues so all patients attending appointments are appropriately supported.</p> <p>In order to best serve patients can the framework have an ambition to signpost or create resources for practitioners around EDI, which can contribute towards CPD.</p>	<p>We recognise the framework can be used to raise awareness among the profession of EDI building on the promotion of EDI activities already being undertaken through GOsC social media.</p> <p>We have added an activity to the action plan to consider how we can signpost and promote resources available to registrants from different sources.</p>
<p><b>Theme: Underrepresentation</b></p> <p>The framework needs to address disparities and apparent lack of representation / inclusion within GOsC and the profession.</p> <p>Osteopaths should be representative of all in society. There is a perceived underrepresentation in the profession in terms of disability and ethnicity. There should be increased</p>	<p>The framework includes an action to review our recruitment materials to ensure there are no barriers that may prevent applicants from applying for vacant positions.</p> <p>The GOsC Council approved co-funding for research into under-represented groups experience of osteopathic education and training. This research may have wider benefits such as</p>

<b>Feedback</b>	<b>Response</b>
<p>representation of minority ethnic groups in students, educators and the profession more broadly.</p> <p>There should be encouragement for the Osteopathic Education Institutions (OEIs) to work on EDI individually and collectively to change the culture of those entering the profession.</p> <p>There should be a joint EDI project with the Institute of Osteopathy and the OEIs regards removing barriers to osteopathy for students with protected characteristics.</p>	<p>highlighting how to attract a wider diversity of student applications.</p> <p>We are also collecting systematic diversity data about student enrolment and progression and exploring the possibility of undertaking a survey of registrants to better understand the protected characteristics of our registrants to inform our regulatory activities. We will reflect the planned EDI survey in our action plan.</p> <p>The research referenced above will be open for all osteopathic education providers with learning / recommendations shared widely among the providers, the profession and other stakeholders.</p> <p>See above response. Reporting on the progress of the research has been added to the action plan.</p> <p>Much of this feedback has also been taken into account by strengthening requirements in the draft outcomes for students and the Standards for Education and Training for education providers set out in the Guidance for Osteopathic Pre-registration Education and Training.</p>
<p><b>Theme: Inclusivity</b></p> <p>When promoting EDI you should clarify that osteopaths should be inclusive for all patients and, if an osteopath is not inclusive, what a patient can do about that.</p>	<p>The framework does recognise our role in helping osteopaths identify their own benefits around how they interact, communicate and work with their patients.</p> <p>The Osteopathic Practice Standards (OPS) 2019, Standard A1, says: 'You must listen to patients and respect their individuality, concerns and preferences. You must be polite and considerate with patients and treat them with dignity and</p>

<b>Feedback</b>	<b>Response</b>
<p>The framework should say that GOsC websites will be accessible and that patients can raise concerns in different ways.</p> <p>The framework should include Non-EU graduates and workers as a character of diversity. Osteopathic clinics should be encouraged to hire international applicants to increase diversity and develop a global perspective which is culturally diverse. Osteopathic clinics should offer salaried roles to help international applicants with visa applications.</p>	<p>courtesy'. When promoting inclusivity and considering signposting resources for osteopaths to support EDI, we can reference back to the OPS.</p> <p>The action plan includes an action to review the accessibility (ease and understanding) of how people may raise concerns.</p> <p>We feel this point goes beyond our regulatory scope and that of the framework, and we have concluded that we cannot include this suggestion.</p>
<p><b>Theme: External verification</b></p> <p>GOsC should be seeking external consultancy from organisations such as Gendered Intelligence and Stonewall to ensure the framework is as good as it could be.</p> <p>The framework should not include statements such as 'diverse organisations are better performers than homogenous organisations' without there being clear peer reviewed evidence to support this.</p>	<p>We have noted the suggestion; however at this stage in the development of our EDI Framework we suggest it would be better to focus on a number of important early actions before considering bringing in external consultancy to assess our progress.</p> <p>There are a number of studies which support the statement and a hyperlink has been added to the framework.</p>
<p><b>Theme: Metrics, monitoring, actions and external communications</b></p> <p>The review of the website should be prioritised as an action. The website does not give the impression of a diverse and inclusive organisation. It could include information about people</p>	<p>We will prioritise a review of our website starting with the publication of our framework and our actions and will take steps to make the people of the organisation more visible on the</p>

<b>Feedback</b>	<b>Response</b>
<p>in our organisation, our EDI approach and progress against our actions, shorter sentences, more diverse patient stories etc.</p>	<p>website. Over time we will develop and publish information around diversity. We are also committed to regularly reviewing the accessibility of our websites.</p>
<p>The formulisation of measurements and metrics should be the first task before the framework is published. There should be metrics in the framework to better understand the baseline.</p>	<p>Understanding a baseline is important and we commit to developing baseline metrics by the end of December 2021 as an action in our framework. The immediate publication of the framework will demonstrate our commitment to action and will begin the journey of publishing progress.</p>
<p>There should be a supplementary implementation plan to sit alongside the framework. The independent auditor should be asked to come back in one year to assess performance against the plan.</p>	<p>The Audit Committee and Council will monitor our implementation of the actions which are outlined and will be able to seek external advice as appropriate.</p>
<p>The staff EDI group should publish their terms of reference and be held to account against them. They should ensure they have an external representative on the group.</p>	<p>We note the feedback and will consider this in due course. The key point is that in particular, our patients and public, want to see action against the framework.</p>
<p>There should be a dedicated budget/engagement fund for EDI activities in GOsC.</p>	<p>This is something we can consider as part of our budget strategy 2022-23 work.</p>
<p>GOsC should trial blind recruitment for staff, non-executives, council/committee vacancies</p>	<p>Our recruitment processes are 'blind' up to the point of interview.</p>
<p>GOsC should identify innovative activities in other organisations and trial them at GOsC, for example:</p> <ul style="list-style-type: none"> <li>• NHS England: Ramadan - non-Muslims 1 day of fasting to see what the experience was like (<a href="https://people.nhs.uk/guides/covid-19-and-ramadan/">https://people.nhs.uk/guides/covid-19-and-ramadan/</a>)</li> </ul>	<p>We note the feedback and will ask the GOsC staff EDI group to consider</p>



Feedback	Response
Paragraph 23: Suggestion to use the terminology impairment rather than disability.	The amendment has been accepted.
Paragraph 29: We must therefore always seek to continuously improve across all aspects of our work – suggest replace word 'seek' with 'strive'.	The amendment has been accepted.
Paragraph 29: This will include: <ul style="list-style-type: none"> <li>• how we evidence and report on what we do – suggest this becomes, 'how we review, analyse, produce, evidence and report on what we do'</li> </ul>	The amendment has been accepted.
The framework is just focusing on patients at the moment but what about their parents and carers and families. I am a carer and I don't feel included.	We have added an explanatory footnote to our framework to provide greater clarity.
The framework should have hyperlinks inserted.	We will review the document and insert hyperlinks where appropriate

8. The Equality, Diversity and Inclusion Framework 2021-24 has been updated to reflect the feedback we have received and the revised document is presented to Council at Annex A for approval.

*Equality, Diversity and Inclusion Annual Report 2020-21*

9. Council receives an annual report on EDI and this is set out at Annex B. This year the report has been prepared against the backdrop of the global pandemic; however, there are a number of activities which GOsC has undertaken which still demonstrates our commitment to EDI even through the most challenging of circumstances. These include:
- our work on increasing the diversity of applications for non-executive vacancies;
  - how we have considered equality and diversity as part of our CPD evaluation, and
  - the independent audit completed by an equality expert in 2020.
10. Council will be asked to note the Annual Report 2020-21.



**Recommendation:**

1. To approve the Equality, Diversity and Inclusion Framework 2021-24.
2. To note the Equality, Diversity and Inclusion Annual Report 2020-21.



General  
Osteopathic  
Council

**Equality, Diversity and  
Inclusion Framework  
2021-24**

## Introduction

1. As the statutory healthcare regulator for the practice of osteopathy in the UK, our approach to Equality, Diversity and Inclusion (EDI) is critical to the successful delivery of our Strategic Plan 2019-24.
2. To be a robust, effective regulator, it is critical that EDI is embedded through our entire business approach and at the heart of our activities.
3. This framework sets out:
  - Our policy and legal duties.
  - The actions we intend to take.
  - Our EDI governance.
4. We are absolutely committed to raising further our approach to EDI and this framework will be reviewed at least annually by the Council of the General Osteopathic Council.

## About the General Osteopathic Council (GOsC)

5. We are the independent statutory regulator for the osteopathy profession in the UK established through the Osteopaths Act 1993.
6. The over-arching objective of the GOsC is the protection of the public and 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 the profession.
7. We also have responsibility to develop and regulate the profession of osteopathy as outlined in Section 1(2) of the Osteopaths Act 1993.
8. We achieve our over-arching objectives and responsibilities through:
  - Keeping a Register of all those permitted to practise osteopathy in the UK.

## Annex A to 12

- Working with the public and osteopathic profession to promote patient safety by registering qualified professionals and setting, maintaining and developing standards of osteopathic practice and conduct.
  - Helping patients<sup>1</sup> with any concerns or complaints about an osteopath including having the power to remove from the Register any osteopaths who are unfit to practise.
  - Assuring the quality of osteopathic education and ensuring that osteopaths undertake continuing professional development.
9. EDI is a fundamental component of how we meet our over-arching objectives, and taking account of different needs and recognising the diversity of different perspectives, is a strength and brings an added depth to our work.
10. This means 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.
11. We understand that we have a critical role to encourage and promote EDI to our osteopaths so they are able to identify their own benefits particularly in how they interact, communicate and work in collaboration with their patients.
12. We understand that to be the best possible version of our organisation, we must to attract, develop, motivate and retain talented people across the breadth and depth of our business and that every member of staff has a key role within our organisation. It is therefore important that our culture and values reflect EDI and that our people are able to be their true selves within our workplace.
13. We require our staff and non-executives to be committed to promoting EDI and meeting our equality duties and the objectives of this framework, which support the delivery of our Strategic Plan goals.

### GOsC Strategic Goals 2019-24

- We will support the osteopathic profession to deliver high quality care, which will protect patients and the public in the context of changes in the dynamic landscape of healthcare.
- We will develop our assurance of osteopathic education to produce high quality graduates who are ready to practise.

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<sup>1</sup> Patients can mean patients, carers, their families and the public

## Annex A to 12

- We will build closer relationships with the public<sup>2</sup> and the profession based on trust and transparency.
- We will be an exemplar in modern healthcare regulation – accessible, effective, innovative, agile, proportionate and reflective.

### Our EDI objectives

14. Our EDI objectives are best described against our commitment to:

- Promote equity
- Value diversity
- Embrace inclusivity

### Promote equity

15. To promote equity we will ensure that our regulatory activities are fair and free from unlawful discrimination and that this is reflected in the standards we set for the osteopathy profession which therefore promote equal opportunity and access to the osteopathy profession.

### Value diversity

16. In line with our Communications and Engagement Strategy, we will communicate and engage with a diverse range of stakeholders in an accessible and timely manner. We will continue to recognise the strength which exists in diversity and we will ensure we value this in our recruitment, development and ongoing work of staff, non-executives and stakeholders.

### Embrace inclusivity

17. Diverse and inclusive organisations outperform homogenous businesses<sup>3</sup>. We will ensure our culture and values enable those who work with us to be their true selves without hesitation, and for their views to be included fully with respect and dignity.

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<sup>2</sup> We have interpreted 'the public' here to mean osteopathic patients and potential patients rather than the wider public who we are not able to influence with our small budgets and specific focus.

<sup>3</sup> [7 studies that provide the value of diversity in the workplace](#)

## How the Framework will guide our approach to EDI

**Our policy and legal duties:** ensuring we meet our legal duties as a designated public authority subject to the public sector equality duties under the Equality Act 2010 and the Human Rights Act 1998<sup>4</sup>.

18. 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>5</sup> and those who do not.
- c. Foster good relations between people who share a relevant protected characteristic and those who do not.

19. Having due regard means we must think consciously and carefully about these duties in our day-to-day work, so that equality issues influence our decisions in developing policy, in delivering services, and in our role as an employer.

20. We have to do this in a proportionate way, focusing more attention on functions that have the most impact on different groups of people. We have this duty even if a third party carries out the function on our behalf.

21. 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.

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<sup>4</sup> You can find more information on these from the Equality and Human Rights Commission or Government Equalities Office. We also regulate education, training and practice in Northern Ireland. The Equality Act does not apply in Northern Ireland. But similar equalities legislation applies, which we support through our regulatory activities.

<sup>5</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 duty A.

## Annex A to 12

22. Complying with the duty may involve treating some people differently. The duty recognises that the needs of people who have an impairment are different from the needs of others.
23. This may mean making reasonable adjustments or treating people with an impairment more favourably than people who aren't impaired – for example, through positive action to help them participate more fully.
24. Having due regard to the need to foster good relations involves having due regard to the need to tackle prejudice and promote understanding.
25. In addition to our 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](#).

**The actions we intend to take:** ensuring that EDI is threaded through the delivery of our Strategic Plan goals 2019-24.

26. We recognise the importance of EDI, and in particular ensuring that EDI implications are considered before commencing business activity. During 2020 we commissioned an external independent audit of our approach to EDI. This was to ensure we could develop a new sustainable approach which builds upon what we do well, and which identifies what we can do better.
27. The independent audit identified a number of actions which will be addressed across the first 18 months of this Framework 2021-24. There will be a review of the Framework at that stage to identify what actions are next required to enhance our approach to EDI.
28. Those actions are set out in the Annex to this Framework.

**Our EDI governance:** ensuring that we strive to continuously improve our approach to EDI in accordance with best practise.

29. It is important to recognise there will never be an end point when we will be able to say our work on EDI has concluded. We must therefore always strive to continuously improve across all aspects of our work. This will include:
- how we develop and implement policy;
  - how we develop and maintain our culture;
  - how we ensure the diversity of the people we work and contract with;
  - how we communicate; and,
  - how we review, analyse, produce, evidence and report on what we do.

## **Annex A to 12**

30. The Chief Executive and Registrar is responsible for ensuring that EDI is integral to the organisation's work and they will be held accountable by the Council.
31. The Council of the GOsC has overall responsibility for ensuring that the organisation meets its statutory duties under the Act. Council will receive an annual report on EDI matters including performance against the actions outlined in the Annex to the Framework.
32. As part of every paper presented to Council and one of its committees, EDI implications will be identified on the cover paper and within the content of the discussion document.
33. Audit Committee will support Council by overseeing what progress the Executive team have made implementing the recommendations of the independent audit report of 2020.
34. Our EDI staff group will work with the Chief Executive and Registrar and Senior Management Team to address the recommendations identified in the independent audit of 2020. The staff group will prioritise those actions which have the greatest impact, delivered across a realistic timeframe. They will be supported, where necessary, by independent expertise and where appropriate they will issue reports and offer advice and guidance.
35. In-conjunction with Council and Audit Committee, the EDI staff group will develop a range of metrics to demonstrate our progress against the Framework.
36. In our Annual Report to Parliament, we will report on the arrangements that we have put in place to ensure that we apply good practice in relation to EDI, as required by section 40A(1)(a) of the Osteopaths Act 1993.



## Annex to framework: EDI Action Plan 2021-24

The following action plan will cover the opening 18 months of the Framework:

### **By end July 2021, we will have:**

- Published and promoted our first Equality, Diversity and Inclusion Framework.
- Started the systematic promotion of equality and diversity events, such as LGBT+ history month, mental health awareness, through GOsC social media channels.
- Updated our Equality Impact Assessment template and provided guidance for staff on how and when to use the document.
- Reviewed our recruitment materials for non-executive positions to ensure they are EDI friendly and do not introduce barriers that may prevent applicants from applying.

### **By end December 2021, we will have:**

- Reviewed and updated our EDI webpages.
- Developed more systematic systems for reviewing EDI data on our staff and non-executives.
- Developed metrics for reviewing the progress of our EDI activity.
- Commenced a review of resources and signposts we make available for registrants to promote a greater understanding of EDI.
- Reviewed the accessibility (ease and understanding) of how people may raise complaints about osteopaths and the GOsC.
- Considered whether the budget envelope has sufficient resources for EDI activity.

### **By end June 2022, we will have:**

- Reviewed the training we provide to staff and non-executives and implemented changes to ensure its relevancy to our work.
- Improved the systematic monitoring of diversity data across the GOsC. This includes having completed a profession wide EDI survey and analysis the data that we have received in response.
- Improved how we report on our EDI activities to Council and our wider stakeholders.
- Reported to Council on the progress of the research we are co-funding on under-represented groups experiences of osteopathic education and training.
- Ensured that our approach to EDI is more systemic across the organisation and that good practice is routinely shared.

## Report on Activities in 1 April 2020 - 31 March 2021

Equality and diversity theme	Main activities
1. Service provision	<p><b>A. We will ensure that information is available (or can be made available) in accessible formats, whether in hard copy or online.</b></p> <p>We ensure all documents intended for external use are offered in accessible, easy to use, formats. We will post out printed copies of online materials where requested.</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. (<a href="http://osteopathy.org.uk/accessibility">See <u>osteopathy.org.uk/accessibility</u></a>)</p> <p>We continue to seek to incorporate in our website high standards of accessibility and readability. In the reporting year we had an increase in traffic to our website as a result of the pandemic and the creation of our covid-19 hub which contained all of the information and resources that we had created to support the profession. We ensure that our resources are designed to meet a range of learning styles and draw upon best practice in use of typefaces, fonts and colours to enhance accessibility.</p> <p>Over the past year we have ensured that we utilise images (photos and illustrations) to reflect diversity in our recruitment materials and through our social media and print publications.</p> <p><b>B. We will use a wide variety of channels to communicate and engage with a diverse range of stakeholders.</b></p> <p>We continued to utilise our own channels including our bi-monthly print magazine The Osteopath (up to the point of its discontinuation), monthly news ebulletins, websites and social media. In the reporting year we were unable to conduct in person meetings due to the pandemic; however, we significantly enhanced our online communications which included small webinars with regional groups, students and</p>

other osteopathic communities, as well as larger scale CPD webinars and new Fitness to Practise webinars.

We are clear that when we need to communicate and engage with a diverse range of stakeholders, for example, during consultations, that we take their needs into account in order to maximise the interaction we have with them.

In the year we have positively promoted awareness of equality, diversity and inclusion through our social media which included LGBT+ history month and Pride month through changing our GOsC profile picture on social media to a temporary design of the GOsC logo featuring the rainbow flag; promoting Black History Month, and mental health awareness campaigns through the use of our email signatures.

**C. We will ensure that Osteopathy House and any GOsC external events are accessible.**

We maintain an ongoing commitment to ensuring Osteopathy House is accessible for meetings and events, including a hearing loop for use in the Council Chamber. Osteopathy House has been closed during the pandemic and during this time we have taken steps to ensure that the headquarter building is covid-secure for when staff and visitors have been in attendance. This has included: risk assessments, new signage, new office protocols, additional cleaning materials and stations, desk screens.

**D. 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.

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/>

	<p>In the year, the team introduced interim guidance to ensure we were able to conduct remote hearings. This guidance included:</p> <p>Interim remote hearings protocol: <a href="https://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/interim-remote-hearings-protocol-july-2020/">https://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/interim-remote-hearings-protocol-july-2020/</a></p> <p>Interim practice note on questioning witnesses in a remote setting: <a href="https://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/professional-conduct-committee-interim-practice-note-july-2020/">https://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/professional-conduct-committee-interim-practice-note-july-2020/</a></p> <p><b>E. We will meet our duties under the Welsh Language Act.</b></p> <p>We submitted our annual monitoring report to the Welsh Language Commissioner following the Annual Report to Council in July 2020.</p> <p>In the reporting year, the Register included 32 practices where the Welsh language can be used with patients. We also responded to the consultation on the Welsh Language Standards setting our broad agreement with the proposals subject to concerns over the proportionality of implementing the standards within a regulator of our size/capacity.</p>
<p>2. Policy development and implementation</p>	<p><b>A. We will assess the equality and diversity implications of all new policy development and operational activities.</b></p> <p>Council had previously recognised that it wished to review our approach to equality, diversity and inclusion and in the reporting period we commissioned an independent audit. The scope of the audit was agreed by Audit Committee which was, for reference, as follows:</p> <p>`...provide a baseline to understand what areas should be prioritised for improvement, and where there is already best practice that should be maintained or replicated. A report with an EDI gap analysis and identified good practice in the GOsc. The report will include recommendations about how to address the gaps in a staged approach. In addition to suggested priorities, areas of potential risk and opportunities</p>

for improvement will be identified. The recommendations will be presented with an action plan that clearly sets out quick wins and longer-term actions to address the gaps.'

The report was presented in full to the Audit Committee and provided to Council via DocMonster. The independent audit did not identify any breaches in the Equality Act 2010. A paper was considered by the Council in February 2021, alongside a draft Equality, Diversity and Inclusion Framework 2021-24 which provided a structure for how we will further enhance our activity in this area. The draft framework was approved for publication in order that we could obtain feedback from stakeholders and patients on the document and an updated document will be presented to Council at the July 2021 meeting.

We have sought feedback on the draft framework from a range of stakeholders and we have held a number of focus groups and telephone interviews with registrants, patients and the public to inform the version presented to Council for approval.

In the reporting period we have undertaken a number of equality impact assessments which included the Business Plan and Budget 2021-22 and around our work on the Guidance for Osteopathic Pre-Registration Education and Standards for Training. Papers presented to Council and Committees have taken equality, diversity and inclusion issues into account, especially our CPD Evaluation.

**B. We will publish formal equality impact assessments on all major projects.**

See response to A.

**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.**

In the reporting period we undertook the following public consultations:

- Guidance on insurance requirements for osteopaths
- Reduced registration fee

- Screeners Guidance

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. The consultations have been conducted in accordance with our consultation principles.

### 3. Data collection and analysis

**A. 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.**

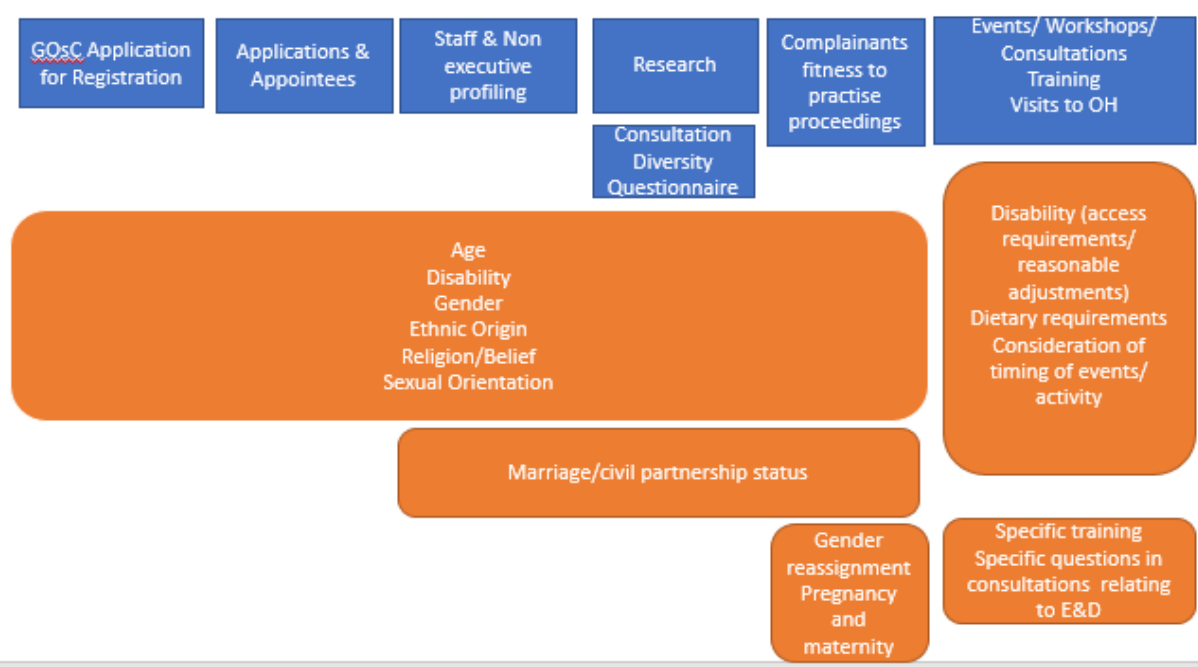


Figure 1: E&D Data Collection Process

We collect and record equality and diversity data across the full range of our business activities – see figure 1 – for a range of different purposes.

To ensure that we are systematically collecting and recording EDI data we are considering how we might undertake a full equality and diversity data collection exercise with our registrants to ensure we have an accurate and up-to-date data set. We have discussed this colleagues within other healthcare regulators in order to learn from their experiences of undertaking similar work.

**B. We will collect and record equality and diversity data in relation to consultation responses and research surveys and evaluate the data where possible.**

We collect and record equality and diversity data in relation to consultation responses and the CPD Evaluation survey.

In the reporting year we ran three consultations which were supplemented with a diversity monitoring form. Data collected is evaluated and reflected upon to inform the purpose for which it collected. In the reporting year, data was collected and used to inform the CPD Evaluation papers considered by Council and its committees.

**C. We will collect and record equality and diversity data on all applicants and appointees to non-executive and executive posts.**

We have continued to collect and record equality and diversity data in relation to staff and non-executive applications and appointments. In the year under report, equality monitoring statistics have been collated and reported to the Remuneration and Appointments Committee for our fitness to practise appointments made in year.

With our recruitment campaigns we took specific steps to enhance the diversity of the applications we received. This included a review and changes to the recruitment materials to make them more inclusive and welcoming; we were more active with our social media promotion and we used a video from an existing fitness to practise panel member to encourage applications from those who may not have

## Annex B to 12

	<p>previously thought about applying. For this round of recruitment we received the highest number of applications ever received and with a greater diversity of applicants than before.</p> <p><b>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.</b></p> <p>Data collected is analysed and reflected upon to inform the purpose for which it collected. In the reporting year, data was collected and used to inform the CPD Evaluation papers considered by the Policy Advisory Committee (October 2019) and Council (November 2019).</p>
<p>4. Partnerships and the implementation/ promotion of standards</p>	<p><b>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).</b></p> <p>In the reporting year we were approached with a proposal to co-fund research into undergraduate experiences of osteopathic education and training. This was presented to Council outside of the reporting period.</p> <p><b>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).</b></p> <p>We continue to work with ODG partners including on the importance of recognising equality and diversity aspects of ODG projects.</p>
<p>5. Employment and governance</p>	<p><b>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.</b></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. Remuneration and Appointments Committee monitor staff</p>



	<p>recruitment and retention and are made aware of any new flexible working arrangements which have been introduced, particularly around reasonable adjustments.</p> <p>In the reporting year, and as a direct consequence of the coronavirus pandemic, we have converted our staff to home working. We have ensured that staff who required reasonable adjustments in the office have been able to work from home without any difficulties. As we have considered a return to office working we have been in close communication with the staff team to understand concerns and adjustments which might be required.</p>
	<p><b>B. We will ensure that all non-executives and executives receive appropriate and regular equality and diversity training.</b></p> <p>This year we have provided training for staff on mental health awareness which has been of particular importance during the challenging period of the pandemic. We have also taken steps to ensure that we have provided a number of signposts to resources for registrants to support them during the previous year. All new non-executives and new members of staff are required to undertake online training on equality, diversity and inclusion.</p>
	<p><b>C. We will seek to improve the diversity of applicants and appointees to non-executive roles.</b></p> <p>See response to 3C.</p>
	<p><b>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.</b></p> <p>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.</p>