



Council

18 July 2024

Equality, Diversity and Inclusion Annual Report 2023-24 and Equity, Diversity, Inclusion and Belonging Framework, 2024-30

Classification

Public

Purpose

For decision

Issue

The paper presents our Annual Report to Council on the work we have undertaken on equality and diversity in the year 2023-24 and sets out the draft Equity, Diversity, Inclusion and Belonging Framework, 2024-30.

Recommendation(s)

1. To consider the Equality, Diversity and Inclusion Annual Report 2023-24.
2. To agree the Equity, Diversity, Inclusion and Belonging Framework, 2024-30.

Financial and resourcing implications

The budget approved by Council includes funds for EDI activity.

Equality and diversity implications

These are set out in the paper.

Communications implications

We ensure our communications reflect the diversity of the profession and wider society.

Annex(es)

- A. Equality, Diversity and Inclusion Annual Report 2023-24
- B. Draft Equity, Diversity, Inclusion and Belonging Framework, 2024-30

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Key messages from the paper:

- Council receives an annual Equality, Diversity and Inclusion (EDI) report, which is presented at Annex A. Headlines from the report include:
 - The Professional Standards Authority recognising, in our performance review report, that we have demonstrated good practice in taking action to secure external input into our policy work and the clear EDI focus of the standards required for registrants, students and Osteopathic Educational Institutions.
 - The positive promotion of awareness of equality, diversity and inclusion through our social media and our attendance, for the first time, at Pride in London.
 - That our recruitment for non-executive positions has yielded the most diverse set of applicants we have ever received across a range of protected characteristics.
 - Compliance with new Welsh Language Standards which required a significant volume of work.
- In 2021 we developed out our first Equality, Diversity and Inclusion Framework which ends in July 2024. Attached at Annex B is the next iteration for agreement by Council – being our draft Equity, Diversity, Inclusion and Belonging Framework.
- The Framework describes our current baseline position and articulates where we would like to be by 2030 alongside proportionate actions that will take us along this journey over the next 12-24 months.

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. Council receives an annual report on our activities over the last year relating to equality, diversity and inclusion. The annual report is set out at Annex A.

Discussion

Equality, Diversity and Inclusion Annual Report 2023-24

3. In the year, we have undertaken a range of activities which support, enhance and demonstrate our ongoing commitment to equality, diversity and inclusion across the full range of our business. We are continuing to collect evidence to demonstrate that our activities are having a positive impact and we believe that there have been a number of successes in 2023-24, including:
 - The Professional Standards Authority recognising, in our performance review report, that we have demonstrated good practice in taking action to secure

external input into our policy work and the clear EDI focus of the standards required for registrants, students and Osteopathic Education Institutions.

- The positive promotion of awareness of equality, diversity and inclusion through our social media and our attendance, for the first time, at Pride in London.
 - That our recruitment for non-executive positions has yielded the most diverse set of applicants we have ever received across a range of protected characteristics.
 - Compliance with new Welsh Language Standards which required a significant volume of work.
4. With the annual report being presented to the new formation of Council we would be interested to receive feedback from members about its content. Some questions which may orientate discussion include:
- Was the report informative and do you think it added value?
 - Was the report accessible?
 - Were there gaps within the report where members expected to see information?
 - Were there any surprises contained within the report?

Equity, Diversity, Inclusion and Belonging Framework, 2024-30

5. Three years ago we introduced the first Equality, Diversity and Inclusion Framework into the GOsC. It outlined our policy and legal duties, our governance arrangements around EDI and the actions we intended to take to progress our work in this area. We reported to Council annually on our work as part of the annual EDI report (see Annex A).
6. That document ran from July 2021 to July 2024 and is now due for renewal.
7. We attach at Annex B a draft Equity, Diversity, Inclusion and Belonging (EDIB) Framework, 2024-30 which we propose replaces the current framework. We have made the following changes to that document:
- Changed the name of the document. One of our aims within the document is to 'promote equity' and it seemed inconsistent that the title of the document did not reflect this. We have introduced belonging into the title, supported by an additional aim to 'create belonging' as we feel this was a gap within the current framework.
 - Described a baseline for our current position, three years on from the introduction of the first EDI Framework. This baseline will enable us to

record our activities as at 2024 so that we can track our progress through to 2030.

- Described where we believe we would like to be by 2030, meaning that the actions we outline in the paper are moving towards that end position.
8. We ran a patient focus group in May 2024 which has informed the development of the EDIB Framework. Feedback from that patient focus group included:
 - Describe your current position / status quo. This will help you demonstrate change in the future.
 - In describing your current position, be clear about what has gone well but also what needs to be improved.
 - Be prepared to recognise issues which may initially be considered beyond your scope of work, i.e. where you can bring your influence to bear.
 - Recognise there may be a tension between the demographics of the population you are regulating, wider society and the demographics of those who work within the regulator.
 - Do not be afraid of being stronger/harder in the use of language to describe either what you currently do and where you want to be in the future.
 9. We have reflected upon the feedback from the patient forum and have attempted to address these points in the updated Framework.
 10. Council is asked to consider and approve the draft EDIB Framework. To help with the conversation, questions Council may wish to consider include:
 - Does the EDIB Framework achieve the aim of containing our legal and policy requirements as well as articulating the future actions we wish to take?
 - Is the EDIB Framework clear, accessible and appropriate to our context?
 - Are there gaps in the EDIB Framework?
 - Are the future actions outlined in the EDIB Framework appropriate?

Recommendations:

1. To consider the Equality, Diversity and Inclusion Annual Report 2023-24.
2. To agree the Equity, Diversity, Inclusion and Belonging Framework, 2024-30.

Report on Activities in 1 April 2023 - 31 March 2024

EDI theme	Main activities
1. Service provision	<p>A. We will ensure that information is available (or can be made available) in accessible formats, whether in hard copy or online.</p> <p>We ensure all documents intended for external use are offered in accessible, easy to use, formats. We 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. (See <u>osteopathy.org.uk/accessibility</u>). We will explore whether can reach AA status as part of our future website development project.</p> <p>We continue to seek to incorporate in our website high standards of accessibility and readability as we have an increase in traffic to our website. 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. We will constructively challenge those we work with to ensure that their materials, which we may publish, are accessible for our service users.</p> <p>We ensure that we utilise images (photos and illustrations) to reflect diversity in our recruitment materials and through our social media, print publications and on our website. We are also diversifying how we communicate information, for example, through the use of animations with subtitles and video clips, which are reflected on our websites although we have more to do in this space. This ensures that information is available for osteopaths and others in different, accessible formats.</p>
	<p>B. We will use a wide variety of channels to communicate and engage with a diverse range of stakeholders.</p> <p>We continued to utilise our own channels including our redesigned monthly news ebuletin, websites and social media. We have continued to engage with the profession and other stakeholders using online</p>

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EDI theme	Main activities
	<p>communications such as webinars (small and large scale). During the year we have undertaken engagement activities with osteopaths in-person e.g. through local regional meetings and at events being held by the Institute of Osteopathy.</p> <p>We remain committed to communicating and engaging with a diverse range of stakeholders, for example, during consultations, so that we take their needs into account in order to maximise the interaction we have with them. During the year we held online recruitment webinars in order to demonstrate our commitment to inclusion within recruitment of non-executive positions. These events were well attended and led to a significant number of applications being received for our lay and osteopathic vacancies.</p> <p>We have expanded the Cymraeg section of our website to offer a broader range of information to Welsh speakers. This included publishing our patient animation, Visiting an Osteopath, in Welsh with Welsh subtitles. We promote our Welsh language services in Welsh in our ebulletins regularly, and in March we sent out our first student ebulletin in both Welsh and English to students in Wales.</p> <p>In the year we have positively promoted awareness of equality, diversity and inclusion through our social media which included LGBT+ history month; 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. We have also recognised many religious festivals in the year so we can appreciate the diversity of the profession, patients and the stakeholders we work alongside.</p> <p>In 2023-24 we attended Pride in London and walked in the parade for the first time. We did this alongside osteopaths, patients and stakeholder colleagues from the Institute of Osteopathy and the educational institutions. We will be attending future events as we ensure equality and promoting inclusivity of patient healthcare as part of our core business.</p>

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EDI theme	Main activities
	<p>C. We will ensure that Osteopathy House and any GOsC external events are accessible.</p> <p>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 if required. We continue to ensure that the headquarter building is secure for when staff and visitors have been in attendance in our post pandemic environment. This has included: risk assessments, signage, office protocols, enhanced ventilation systems, additional cleaning materials and desk screens.</p> <p>D. We will ensure that complainants, witnesses and osteopaths are effectively supported through the fitness to practise process.</p> <p>We provide comprehensive guidance for all participants in fitness to practise hearings, whether they are witnesses or registrants.</p> <p>Guidance for witnesses: https://www.osteopathy.org.uk/standards/complaints/hearings/attending-a-hearing/witness-guidance/</p> <p>Guidance for registrants: https://www.osteopathy.org.uk/news-and-resources/publications/guidance-for-osteopaths/</p> <p>In the year, we agreed that our interim guidance, initially developed during the early stages of the pandemic, should be made permanent. The guidance was subject to public consultation with osteopaths, patients and stakeholders.</p> <p>During the reporting period we have continued to make available the Independent Support Service for complainants, witnesses and osteopaths which is run by Victim Support and to publicise its availability to the profession and to patients involved in fitness to practise. This service is free for any party of a fitness to practise process and ensures that in addition to the support GOsC can provide, there is an independent service for individuals to use. We ensure this service is known to all parties who are subject</p>

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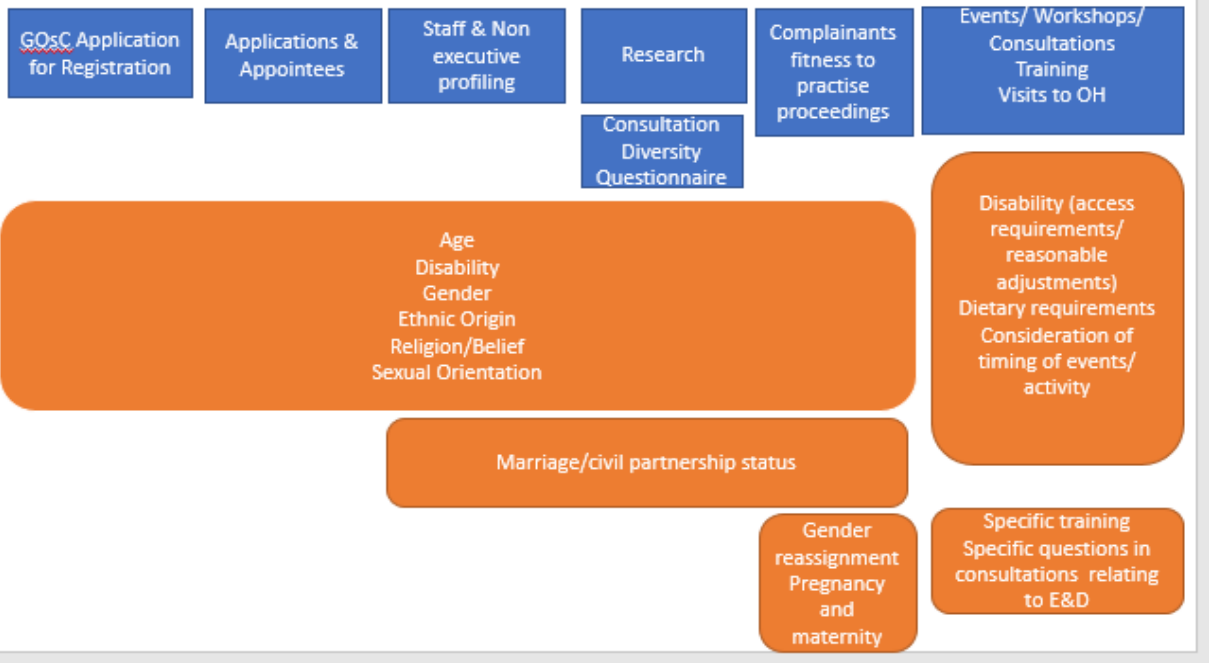
EDI theme	Main activities
	<p>to a fitness to practise process and we have also communicated with the wider profession on the availability of the service. We will continue to raise awareness of this service.</p> <p>Our website also reflects our approach to raising concerns and individuals may raise concerns by either sending the GOsC a hard-copy form or they can make use of the online concerns form. To supplement this, we have introduced a new Fitness to Practise ebulletin as well as running online webinars to explore and explain our approach to handling concerns. These new communication activities act as 'myth-busters' and enable the GOsC to demonstrate our approach is one that is accessible as well as fair and proportionate.</p> <p>We also started to consider a project to collect the EDI data collected through our fitness to practise processes, although we recognise that the number of cases we have is small and that we will need to be careful about the use of data so that individuals are not identifiable. This was also a topic area for our registrant and stakeholder perceptions survey which will be reported on in the next business year.</p> <p>We have a process in place to make sure that Welsh speaking complainant, witnesses and osteopaths can take part in our hearings in Welsh if they wish. We have updated our hearings guidance for witnesses and osteopaths to reflect this position.</p> <p>E. We will meet our duties under the Welsh Language Act.</p> <p>We submitted our annual monitoring report to the Welsh Language Commissioner following the Annual Report to Council in July 2023.</p> <p>In the reporting year, the Register included 27 practices where the Welsh language can be used with patients, which was a reduction on the previous year (35). In total we had 158 registrants practising in Wales, which was an increase on the previous year (146).</p> <p>In order to ensure the Welsh Language is treated as favourably as the English Language we amended our Equality Impact Assessment (EIA) to ensure that any changes to existing policies/guidance, or the</p>

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EDI theme	Main activities
	<p>introduction of new policies/guidance, considers the Welsh Language. We have also ensured that our consultation approach includes reference to the Welsh Language. We made the change to our EIA and to our consultation template ahead of the introduction of new Welsh Language Standards which came into effect in the reporting year.</p> <p>We received a compliance notice from the Welsh Language Commissioner on 6 June 2023 which outlined 67 standards, including policy-making, operational, service delivery and record-keeping standards. These standards supersede GOsC's previous Welsh Language Scheme, implemented in response to the Welsh Language Act 1993.</p> <p>We were able to meet all Standards bar one, which requires that applications/renewals to join/renew our Register be facilitated and processed in Welsh in the same manner as applications in English. We received an extension to the initial deadline and this is set for December 2024. Progress is being made to implement this standard as part of GOsC's project to implement a new CRM system, which will ensure we have the system capability to process Welsh applications.</p> <p>In meeting the new Standards, we translated around 140,000 words across an estimated 60 documents and forms, as well as expanding the Cymraeg section of our website to provide more information about our organisation and our work in Welsh.</p>
2. Policy development and implementation	<p>A. We will assess the equality and diversity implications of all new policy development and operational activities.</p> <p>Council commissioned an audit of our approach to Equality, Diversity and Inclusion in 2020 and this work led to the creation of the GOsC's first ever Equality, Diversity and Inclusion Framework 2021-24. The Framework was promoted to the profession through our usual communication channels, and we have reported to Council annually on our progress against the activities previously agreed. In the year we have been working towards development of a new Equity, Diversity, Inclusion and Belonging Framework to supersede the plan which ends in July 2024.</p>

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EDI theme	Main activities
	<p>In the reporting period we have undertaken a number of equality impact assessments and these have been reported in papers to the Policy and Education Committee, Audit Committee, People Committee and to Council.</p> <p>All papers presented to Council and Committees take equality, diversity and inclusion issues into account, especially our CPD Evaluation papers with discussions at Council and Committee including a greater focus and attention on matters of EDI. Additionally, the budget for the year ahead has ensured that funds are available for activities which will help our commitment to making EDI pervasive throughout everything we do. Our work in seeking external input into our policy work has been recognised as good practice by the Professional Standards Authority in their performance review report for 2023-24.</p> <p>In the reporting year a new GOsC Strategy, through to 2030, was consulted on and published. This Strategy includes a specific strategic aim to 'Champion Inclusivity' which is a further demonstration of our commitment to this area of our work, with goals and milestones articulated in the final version. This was informed by consultation with osteopaths, patients and our stakeholder community.</p> <p>B. We will publish formal equality impact assessments on all major projects.</p> <p>See response to A.</p> <ul style="list-style-type: none"> 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>In the reporting period we undertook the following public consultations:</p> <ul style="list-style-type: none"> Draft Guidance on Imposing Interim Suspension Orders and Practice Note on Undertaking. Draft GOsC Strategy, through to 2030. Draft Guidance on Professional Behaviours and Student Fitness to Practise.

EDI theme	Main activities
	<p>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. We have made a concerted effort this year for all our inhouse and outsourced research work to consistently take into account equality, diversity and inclusion issues.</p>
3. Data collection and analysis	<p>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.</p>  <pre> graph TD subgraph Sources A[GOsC Application for Registration] B[Applications & Appointees] C[Staff & Non executive profiling] D[Research] E[Consultation Diversity Questionnaire] F[Complainants fitness to practise proceedings] G[Events/ Workshops/ Consultations Training Visits to OH] end subgraph Categories H[Age
Disability
Gender
Ethnic Origin
Religion/Belief
Sexual Orientation] I[Marriage/civil partnership status] J[Disability (access requirements/reasonable adjustments)
Dietary requirements
Consideration of timing of events/activity] K[Gender reassignment
Pregnancy and maternity] L[Specific training
Specific questions in consultations relating to E&D] end </pre>

EDI theme	Main activities
	<p data-bbox="510 272 1061 304">Figure 1: E&D Data Collection Process.</p> <p data-bbox="510 344 1939 416">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.</p> <p data-bbox="510 456 1995 639">We are currently working towards the implementation of a new CRM system which will facilitate the easier and greater collection of EDI monitoring data from registrants, by requesting the information at the point of online renewal. We see this as an important development which will ensure we are capturing a dataset that has greater breadth and depth and which will allow us deeper insight into the demographics of our registrant base.</p> <p data-bbox="510 679 1928 791">In the year we also developed an EDI monitoring survey for GOsC staff and non-executives. While outside of this reporting cycle, it is worth noting that the survey has been rolled out and the results reported to the People Committee.</p> <p data-bbox="510 831 1850 903">B. We will collect and record equality and diversity data in relation to consultation responses and research surveys and evaluate the data where possible.</p> <p data-bbox="510 943 1917 1086">We collect and record equality and diversity data in relation to consultation responses, the CPD Evaluation survey and focus group activities now include each participant completing a short survey before joining a focus group, which includes recording equality, diversity and inclusion monitoring information.</p> <p data-bbox="510 1126 1962 1198">In the reporting year we ran consultations which were supplemented with a diversity monitoring form. Data collected is evaluated and reflected upon to inform the purpose for which it collected.</p> <p data-bbox="510 1238 1962 1350">We also work with our education stakeholders to provide student enrolment data for the osteopathic profession as whole on the following protected characteristics: age, sex, ethnicity and race (which also includes country of origin) and disability.</p>

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EDI theme	Main activities
	<p>C. We will collect and record equality and diversity data on all applicants and appointees to non-executive and executive posts.</p> <p>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 People Committee for the appointments made in year. We are able to say with confidence that our recruitment campaigns are generating a significant more diverse set of applicants across a range of protected characteristics.</p> <p>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 ran online recruitment webinars. In previous reporting years we expanded the EDI monitoring data we collected from applicants through our new online application process and this has continued in the reporting period. This new online process has meant that it has been much easier to review the EDI data we collect and to analyse the findings, particularly in terms of completed, incomplete and shortlisted applications.</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>Data collected is analysed and reflected upon to inform the purpose for which it collected.</p>
4. Partnerships and the implementation/	<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 Osteopathic Practice Standards).</p> <p><i>Under-represented Groups Experiences of osteopathic Education and Training (UrGEnT):</i></p>

EDI theme	Main activities
promotion of standards	<p>In 2020-21 we were approached with a proposal to co-fund research into undergraduate experiences of osteopathic education and training. Council approved this funding proposal in May 2021. The project had the following aims and was split into four phases:</p> <ul style="list-style-type: none"> • to explore and describe minority groups' educational experiences during their education in osteopathic education institutions (OEIs); • to identify solutions minority groups feel could support their learning journey and improve their attainment; • to evaluate osteopathic students perceived cultural competence to work with minority groups; • to enhance the professions' and OEIs awareness of the challenges faced by students from underrepresented groups alongside recommendations to enhance experience and attainment. <p>Phase 1: Focus groups reports and systematic review manuscript submission in open access journal</p> <p>Phase 2: Ethical approval for the research</p> <p>Phase 3: Survey and focus groups and submission of manuscripts to open access journals</p> <p>Phase 4: Running dissemination workshops</p> <p>The project has been completed and Dr Jerry Draper-Rodi, the project lead, reported the findings of this important research to Council in February 2024. As a result of this work we organised training for OEI faculty members and supported a webinar ran by Dr Draper-Rodi and Yinka Fabusuyi on improving accessibility and promoting inclusivity. The research was published in April 2024 here: https://bmcmmededuc.biomedcentral.com/articles/10.1186/s12909-024-05404-3</p>

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EDI theme	Main activities
	<p><i>Signposting resources:</i></p> <p>We have taken steps to ensure that we have provided signposts to resources for registrants to support them. Through the GOsC ebuletin and social media we have provided signposts around matters such as looking after one's mental health, and through the fitness to practise ebuletin and webinars we have referenced the support provided by the Independent Support Service for those who are subject to a fitness to practise process.</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 (ODG) partners on development projects).</p> <p>We continue to work with ODG partners including on the importance of recognising equality and diversity aspects of ODG projects and the development of its strategy.</p> <p>In the reporting year we have also discussed with the Council for Osteopathic Education Institutions (COEI) matters related to EDI and we organised training for OEI faculty members and supported a webinar ran by Dr Draper-Rodi and Yinka Fabusuyi on improving accessibility and promoting inclusivity.</p> <p>Our work in ensuring a clear EDI focus of the standards required for registrants, students and Osteopathic Education Institutions (OEIs) has been recognised by the Professional Standards Authority as good practice in our performance review report this year.</p>
5. Employment and governance	<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>We have a range of flexible policies in place to ensure that staff are provided with equal opportunities to undertake their work. The People Committee monitors staff recruitment and retention and are made</p>

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EDI theme	Main activities
	<p>aware of any new flexible working arrangements which have been introduced, particularly around reasonable adjustments.</p> <p>We have maintained our hybrid working patterns ensuring staff who required reasonable adjustments in the office have been able to work from home without any difficulties.</p> <p>B. We will ensure that all non-executives and executives receive appropriate and regular equality and diversity training.</p> <p>We have maintained a focus this year on our employees mental health and their awareness of mental health which has been of particular importance.</p> <p>All new non-executives and new members of staff are required to undertake online training on equality, diversity and inclusion and we will continue to consider what further training might be required. We developed plans for the collection of EDI data from those who work within our Governance model and from staff and we rolled that out, albeit outside of this reporting period.</p> <p>With the significant non-executive recruitment undertaken, we have spent part of this year identifying and developing a training programme for the selection panels. We identified an external, independent trainer rolled out the training to those on our selection panels.</p> <p>Additionally, we ran staff training sessions on EDI (face to face and online demonstrating accessibility) and the implementation of the new Welsh Language Standards.</p> <p>C. We will seek to improve the diversity of applicants and appointees to non-executive roles.</p> <p>In addition to the response we have set out at Section 3C, this year saw the continuation of our Council Associate Programme. The Council Associate Programme has allowed the GOsC to offer development opportunities to osteopaths who have considered applying for governance positions, but who perhaps do</p>

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EDI theme	Main activities
	<p>not yet have the full set of skills. The Council Associates position shadow Council and its Committees and we value the perspectives that our Associates bring to these roles.</p> <p>In the reporting year we considered how we might ensure the patient voice is also captured more fully within the governance model with options considered by Policy and Education Committee and Council.</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 joint regulators' equality and diversity forum.</p>



General
Osteopathic
Council

Equity, Diversity, Inclusion and Belonging Framework 2024-30

Introduction

1. As the statutory healthcare regulator for the practice of osteopathy in the UK, our approach to Equity, Diversity, Inclusion and Belonging (EDIB) is critical to the successful delivery of our Strategy, through to 2030.
2. To be a robust, effective regulator, it is critical that EDIB is embedded through our entire business approach and at the heart of our activities.
3. This framework sets out:
 - Our policy and legal duties.
 - Our EDIB governance.
 - The actions we intend to take.
4. We are committed to the timely and transparent delivery of our approach to EDIB. This framework will therefore 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.

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- 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 patients¹ 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. EDIB is a fundamental component of how we meet our over-arching objectives. Taking account of, and meeting, different needs as well as recognising the strength of diverse experiences and perspectives throughout our work, can help us better achieve our aims as an organisation.
10. To do 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 EDIB 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 EDIB 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 and demonstrating EDIB and meeting our equality duties and the objectives of this framework, which support the delivery of our Strategy.

¹ Patients can mean patients, carers, their families and the public

Our Strategy: Vision and Priorities

Our Vision: to be an inclusive, innovative regulator trusted by all.

Our Priorities:

- **Strengthening Trust:** We will work to enhance and improve our relationships with those we work with so together we can help protect patients and the public.
- **Championing Inclusivity:** It is important to us that people who interact with us, or who work for us, can be their true selves and that we understand and break down any barriers which prevent them from doing so
- **Embracing Innovation:** We will continually seek out and take opportunities to improve what we do and how we do it, so we continue to improve as an organisation.

Our Values

Our values underpin the way we work now and in the future. This includes how we work with patients and the public, osteopaths and stakeholders and how we work within our organisation in and across our teams. We work **collaboratively** to be an **influential** and **respectful** regulator with an **evidence-informed** approach.



Our EDI objectives

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

- Promote equity
- Value diversity
- Embrace inclusivity
- Create belonging

Promote equity

15. We will ensure that our regulatory activities are fair, taking account of existing inequalities, and free from unlawful discrimination, and that these are reflected in the standards we set for the osteopathy profession. We will strive to recognise and take account of the barriers already existing for some people in order to promote equal opportunity and access.

Value diversity

16. We will listen to, engage and communicate with a diverse range of stakeholders, using a variety of channels, in an accessible and timely manner. This means we recognise the equal value of diverse voices and that strong decisions are made based on diversity of views. We shall ensure we value diversity in our recruitment, development of staff, non-executives and stakeholders and in the ways that we work.

Embrace inclusivity

17. Diverse and inclusive organisations outperform homogenous businesses². We will ensure our culture and values enable those who wish to work with us - be that our staff, members of governance, our key stakeholders and patients - are confident that they will feel valued, enabled and empowered to contribute as equals and that their views will be included fully with respect and dignity.

Create belonging

18. We will create a psychologically safe organisation where our people (staff and non-executives) feel confident to be themselves, without risk of embarrassment or rejection, to help us to be the best possible regulator we can. We will ensure our people belong so they can be creative and innovative, and to constructively challenge existing practices for the benefit of patients, registrants and stakeholders.

² [7 studies that provide the value of diversity in the workplace](#)

How the Framework will guide our approach to EDIB

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 1998³.

19. 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 characteristic⁴ and those who do not.
- c. Foster good relations between people who share a relevant protected characteristic and those who do not.

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

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 and support people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

22. Complying with the duty may involve treating some people differently, recognising the impact of inequalities. For example, the duty recognises that the

³ 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.

⁴ 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.

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needs of people who have an impairment are different from the needs of others, which may mean making reasonable adjustments.

23. Having due regard to the need to foster good relations involves having due regard to the need to tackle prejudice and promote understanding.

24. In addition to our duties under the Equality Act, as a UK-wide body, the GOsC has legal duties to comply with the Welsh Language Standards (No.8) Regulations 2022.

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

25. It is important to recognise there will never be an end point when we will be able to say our work on EDIB 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 enable and ensure the diversity of the people we work contract with and those who engage with us and our services;
- how we communicate; and,
- how we plan, implement, monitor, evaluate and learn.

26. The Chief Executive and Registrar is responsible for ensuring that EDIB is integral to the organisation's work and they will be held accountable by the Council.

27. 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 EDIB matters including performance against the actions outlined in the Annex to the Framework.

28. As part of every paper presented to Council and one of its committees, EDIB implications will be identified on the cover paper and within the content of the discussion document.

29. Audit Committee and People Committee will support Council by, where appropriate, conducting reviews into aspects of the EDIB Framework to ensure compliance.

30. 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 EDIB, as required by section 40A(1)(a) of the Osteopaths Act 1993.

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31. We will also explore, as part of our future actions, how we report on our EDIB activities and whether we should introduce a formal report we produce and publish each year, akin to the Fitness to Practise Annual Report, for example.

Our current position: by understanding our current position we will be able to determine what progress we make in the future.

32. The annex to the Framework summarises our baseline position on EDIB in 2024. By articulating where we are today, we will be able to track our future progress, be outcome focused and assess our added value.

Where do we want to be: by describing what future success looks like within our context, we can take practical steps to deliver that outcome.

33. The annex to the Framework articulates where we would like to be by 2030. By describing the future, we can work towards delivering successful outcomes.

The actions we intend to take: ensuring that EDIB is threaded through all that we do.

34. We recognise the importance of EDIB, and in particular ensuring that EDIB implications are considered at the beginning, and then throughout, the development or updating of a new policy, procedure or project.

35. The annex to the Framework highlights the practical steps we will take to deliver future success and to ensure EDIB is pervasive within our organisational activities.

Annex to framework: EDIB Action Plan 2024-30

Our baseline: Over the previous five years we have made much progress integrating equality, diversity and inclusion so that it is more pervasive in everything we do. While not every aspect of our work is referenced below, we summarise the key components of our 2024 baseline as follows:

Education, Standards and Policy

- We undertake equality impact assessments where we are updating existing, or implementing new, policies. Where required, we will bring in external expertise to support and challenge our approach and thinking.
- We issue the Osteopathic Practice Standards (OPS) (2019) which set out the standards of conduct, ethics and competence required of osteopaths to ensure high-quality care for patients. Matters related to EDI are pervasive throughout the OPS.
- We issue Graduate Outcomes which support the OPS and provide a reference point for students, educational providers, patients and others. The Graduate Outcomes set out what the GOsC expects osteopathic educational providers to deliver and students to demonstrate before graduation. There are a range of indicators in the Graduate Outcomes including: communication and patient partnership, knowledge skills and performance and safety and quality in practice and professionalism.
- The Graduate Outcomes and Standards for Education set out expectations on the Osteopathic Education Providers on their arrangements for managing their legal, regulatory and governance mechanisms, the student fitness to practise process, and for ensuring a safe culture exists that enables speaking up.
- Ongoing evaluation of our Continuing Professional Development Scheme which cross tabulates the results from specific questions in a CPD evaluation survey against the eight protected characteristics (also answered via the CPD survey), so as to identify whether there were any barriers to participating in the scheme. We report results to Policy and Education Committee and to Council.
- We analyse data on behalf of the Council of Osteopathic Educational Institutions (COEI) so as to have a sector wide impression of recruitment diversity of students studying osteopathy - this includes sex, age, race and ethnicity, nationality/place of origin and disability.

Registration

- We collect a limited set of EDI monitoring data from applicants for registration (age, gender, disability, sexual orientation, religion/belief, ethnic origin) with no existing process for systematically collecting updated data from our registration population.

- We are currently working to implement a new CRM system which will facilitate the easier collection of data at the point of renewal of registration. This will allow the collection of data across a greater depth and breadth of protected characteristics. We expect this system to be implemented by the end of 2024.
- We prepare a six-monthly registration report for Council which includes the reporting of EDI data around entry to, and exit from, the Register. As part of this report we have recently expanded the data we report on to help meet the needs of Council and our external stakeholders.
- We process international registration applications and ensure that our processes for handling these applications are free from bias and discrimination. We provide training for registration assessors, although we recognise we could be more structured in our approach.

Governance and Human Resources

- Our selection processes have been adapted so that we are using more accessible language, a diversity of imagery and we have widened where we place advertisements in order to attract talent. We have introduced training for our selection panels to ensure that their approach is free from bias and creates an inclusive experience for those who are being interviewed.
- We have seen an increase in the diversity of applicants applying for non-executive positions across the full range of protected characteristics. The data we have collected has demonstrated that our current campaigns attract a greater number of applicants, and are significantly more diverse, than the campaigns we ran in 2019.
- We have collected EDI monitoring data from our staff and non-executives. We received a 74% response rate from staff (20 responses from 27 people) and an 80% response rate from non-executives (41 responses from 51 people).
- A simple analysis of the data demonstrates that the GOsC staff team is broadly representative of society in terms of sex/gender, ethnic origin and disability with a greater proportion of staff identifying their sexual orientation as bi/bisexual or gay/lesbian compared to wider society (UK census data 2021). We have a greater proportion of people working part-time compared with society.
- A simple analysis of the data demonstrates the GOsC non-executive positions are also broadly representative of society in terms of gender and disability with a greater proportion of non-executives identifying their sexual orientation as bi/bisexual or gay/lesbian compared to wider society (UK census data 2021). However, there would appear to be an under-representation in the area of ethnic origin compared to wider society (UK census data 2021). This is something that we will need to continue to monitor via our analyses of incomplete and shortlisted recruitment campaigns.

- We undertake staff surveys every two years and report on the findings to People Committee which cover areas including mental health and well being, recognition and feedback, job satisfaction, personal development, relationship with managers and relationships with peers. Our last survey was in 2022.

Communication and Research

- We have co-funded research into under-represented groups experiences of osteopathic education and training. Further we have committed to funding research into the reasons why osteopaths may choose to leave the GOsC Register – this future work may disclose issues related to EDIB which we are currently unaware of.
- We have made some progress towards making the website more accessible for users; although we have not gone as far as we would have liked due to the need to complete the implementation of the new CRM first which integrates into the website. We have committed reserves to funding a new website which will improve the user experience.
- 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](https://osteopathy.org.uk/accessibility)).
- We incorporate high standards of readability in our materials and 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.
- We utilise images (photos and illustrations) to reflect diversity in our recruitment materials and through our social media, print publications and on our website.
- We have positively promoted awareness of equality, diversity and inclusion through our social media which included LGBT+ history month; 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. We have also recognised many religious festivals in the year so we can appreciate the diversity of the profession, patients and the stakeholders we work alongside.

Fitness to Practise

- 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/>

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- Guidance for registrants: <https://www.osteopathy.org.uk/news-and-resources/publications/guidance-for-osteopaths/>
- Our Hearings and Sanction Guidance includes reference to discrimination in its list of aggravating features to be considered by the Professional Conduct Committee when making a decision as to the type of sanction to impose.
- We recognise that we need to undertake a full review of our all Fitness to Practise guidance, both at the initial stages and hearings stage of the Fitness to Practise process, to ensure the guidance adequately address allegations that involve racist and discriminatory behaviours.
- Annual training is provided for all fitness to practise panel members with new members receiving bespoke EDI training.
- In early 2024, we published a consultation on revised Draft Guidance about Professional Behaviours and Student Fitness to Practise which includes placing expectations about speaking up and not being racist or discriminatory.
- We anonymise registrant EDI data at the screening and investigation stages of our fitness to practise process to minimise the possibility of conscious or unconscious bias and to ensure a consistent and fair approach to decision-making.
- While we have commenced collecting EDI monitoring data from complainants we need to recognise that we have a limited number of complaints each year and not every complainant provides the monitoring data. This means that meaningful analysis, at this stage, is limited.

Our future: While we are proud of the work we have undertaken to date, we know that we can further enhance our work in this area through a planned and structured approach. Looking ahead to 2030, we see future success across as business as including, but not limited to, what we have described below.

Education, Standards and Policy

- We can demonstrate the progress we have made, through working with osteopathic education providers, to equip students and registrants to provide appropriate care to patients and service users. (NB: this will meet a PSA requirement)
- We can demonstrate that have been engaging with osteopathic education providers and other stakeholders to improve the diversity of student admissions and progression. (NB: this will meet a PSA requirement)

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- We can demonstrate progress in developing and implementing plans to reduce any unfair differential attainment in osteopathic education and training. (NB: this will meet a PSA requirement).
- Updates to the Osteopathic Practice Standards and Graduate Outcomes, or any associated guidance we have issued, helps to explicitly describe the EDIB expectations on students, registrants and education providers and how these expectations benefit patients and/or their care.
- We understand health inequalities within the wider society and use of influence to articulate how osteopaths are positioned to help address those inequalities.

Registration

- We will routinely collect, analyse and publish EDI data, across the full range of protected characteristics, related to our registrant population.
- We can demonstrate that our registration processes are fair and free from bias and that any individual involved within a registration application decision has been appropriately trained on EDIB.

Governance and Human Resources

- We publish an Annual EDIB Report which informs discourse within the healthcare and osteopathic sector through the analysis of the data we collect and the work we undertake.
- We can demonstrate that our staff and non-executives are reflective of the diversity of society (NB: this will meet a PSA requirement) and of the profession we regulate.
- We can demonstrate that our recruitment processes for staff and non-executives attract a wide range of diverse applicants across protected characteristics and those other characteristics (i.e. neurodiversity) which are not protected and that every stage of our recruitment processes are free from bias and discrimination.
- We can demonstrate that our use of equality impact assessments and our analysis of data means any unfairness arising through the impact of our work is reduced. (NB: this will meet a PSA requirement)
- We will have evidence from our staff and non-executives, either qualitative or quantitative, that we have created a culture where individuals feel that they belong within the GOsC working environment, in whatever capacity they work.

Communication and Research

- We will have a more accessible website which provides information to patients, registrants and stakeholders in a variety of formats ensuring that we are inclusive of different learning styles and needs.

- With a new website we will reach AA status.
- Our website contains meaningful patient experiences which support our EDIB objectives.
- We will have commissioned, or supported, appropriate research on matters related to EDIB that further our work as a healthcare regulator.

Fitness to Practise

- We can demonstrate that there is no unfair disproportionality across fitness to practise referrals. (NB: this will meet a PSA requirement).
- We will have collected, analysed and published EDI monitoring data from those involved in fitness to practise processes.
- We can demonstrate that the guidance and materials which relate to all aspects of fitness to practise robustly address matters connected to EDIB.
- All decision-makers within the fitness to practise processes undergo regular, context specific training on EDIB so to ensure that our decisions are fair, proportionate and free from bias and discrimination.

How are we going to achieve that future success? The following actions cover the opening 24 months of the Framework only. This is so that we can keep the Framework under close review and ensure that the resources we expend are in those areas which will help us achieve the success we have outlined.

By end December 2024, we will have:

- Implemented a new CRM system and be ready to begin the collection of EDI monitoring data across the full range of protected characteristics.
- Publish an Invitation to Tender for the technical scoping work of a new public website.

By end July 2025, we will have:

- We have collected six-months worth of registrant EDI data through the new CRM system (NB: we do not have a single point in time where every registrant renews, so renewal of registrations happen monthly)
- Completed the scoping, delivery of specification for CMS and development and build of website and agreement to publish invitation to tender for the procurement.

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- Undertaken a full comprehensive review, and made amendments to, all Fitness to Practise guidance both at the initial stages and hearings stage of the Fitness to Practise process to ensure the guidance adequately address allegations that involve racist and discriminatory behaviours.

By end July 2026, we will have:

- Published our first EDIB Annual Report which includes an analysis of our registration EDI monitoring data based on what has been collected through the new CRM system.
- Be close to completion of a new public website and be able to provide evidence that the new website will be more accessible and inclusive than the platform used in 2024.
- Reviewed the training we provide to staff and non-executives and implemented changes to ensure its ongoing relevancy to our work.