

Annex D to 13

Equality Impact Assessment

Step 1 – Scoping the EIA

Title of policy or activity	
Development of guidance note on the application of the Osteopathic Practice Standards (OPS) in relation to the application of adjunctive therapies, non-osteopathic treatments or other work undertaken by osteopaths.	
Is a new or existing policy/activity?	
This is a new policy in relation to the development of guidance to clarify the application of the Osteopathic Practice Standards in relation to approaches which may be adjunctive to osteopathy, non-osteopathic or other work.	
What is the main purpose and what are the intended outcomes of the policy/activity?	
This guidance supplements the OPS. It explores some of the challenges around implementing the OPS for osteopaths who practise other forms of care and adjunctive therapies, or undertake other activities or work. Using case scenarios, it highlights some of the issues that arise, and considers the key factors that an osteopath might need to pay attention to when deciding how to respond to those issues. The intended outcome is to provide clarity around the application of the OPS for osteopaths, patients, educators and others.	
Who is most likely to benefit or be affected by the policy/activity	
The guidance is for osteopaths to use when considering how the OPS apply to all aspects of their work. It is also for members of the public and patients to illustrate how osteopaths approach their obligations under the OPS across the different forms of care and treatment they provide. The guidance will act as a reference for Fitness to Practise Committees when considering concerns that osteopaths have failed to apply the OPS in their practice.	
Who is doing the assessment?	
The process will be led by the Policy Manager, Professional Standards team and overseen by the Director of Education, Standards and Development	
Dates of the EQIA	
• When did it start?	August 2021
• When was it completed?	Ongoing
• When should the next review of the policy/activity take place?	Further review during consultation process

Annex D to 13

Useful information

What information would be useful to assess the impact of the policy/activity on equality?

We have undertaken an equality, diversity and inclusion audit in 2020 which is considered, among other issues, how we collect and analyse our data to explore unintended impacts any groups with particular protected characteristics. Data specification, classification and beginning analysis is incorporated into our Business Plan for 2021. We will have more comprehensive population data about osteopaths rather than a sample that we have at the moment. We are currently working on the specification of the data categories for a population survey and this is planned for later in 2021.

We do not have any data currently which suggests that people with particular protected characteristics will be impacted as a result of this guidance. The number of cases heard about adjunctive therapies is very low and so it would be difficult to draw on data to demonstrate an impact for particular groups at this stage.

Is there data relating to people with any/each of the protected characteristics?¹

We have some data about certain protected characteristics for a sample of osteopaths on the register. (KPMG data). We are currently specifying more precisely more protected characteristics on our register to prepare for a registrant survey about protected characteristics later in 2021.

Where can we get this information and who can help?

We can check, as part of the consultation, whether the guidance could have an impact for people with particular protected characteristics, whether as osteopaths or patients.

¹ The nine protected characteristics in the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Annex D to 13

Step 2 – Involvement and consultation

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

We held a workshop in March 2019 to explore the issue of osteopaths with dual qualifications or undertaking adjunctive or novel therapeutic approaches, and the application of the OPS in such circumstances. Stakeholders included:

- Members of the Professional Conduct Committee
- The Council of Osteopathic Educational Institutions
- Patients
- The Institute of Osteopathy

This used case scenarios to explore some of the issues in relation to the implementation of the OPS, the challenge of finding appropriate expert witnesses where complaints related to novel-approaches, and perceptions as to the applicability of the OPS in given cases.

The outcome was an agreement that more explicit guidance in relation to the application of the OPS would be helpful to PCC members, osteopaths and the public in understanding how standards are applied.

During the workshop, no particular impacts were identified for groups of osteopaths or patients as a result of the issues arising in discussion.

Draft guidance was developed and reported to the Policy Advisory Committee (now the Policy and Education Committee (PEC)) in [March 2020](#). A revised development plan was proposed to the PEC in [June 2021](#), with an agreement to share the draft with stakeholders before reporting back with a final draft for consideration in October 2021. This will then be reported to Council for sign off prior to formal consultation. The guidance has been reviewed to ensure that it includes names from multi-cultural backgrounds and genders.

Annex D to 13

Step 3 – Data collection and evidence

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

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

Our knowledge of EDI issues within the osteopathic profession is incomplete, and as referenced above, we are developing an EDI survey to explore this with registrants.

We do not have data to suggest whether minority ethnic osteopaths, for example, are more likely to be the subject of concerns or complaints, or the outcomes of these, though are working on this and towards collating EDI data for registrants that have been subject to FTP. But as indicated earlier, in relation to adjunctive therapies, the number of these cases is very small and it would be difficult to make any clear inferences solely from the data.

In terms of osteopaths undertaking adjunctive therapies, we know from the Institute of Osteopathy survey data that many do employ other approaches within or in addition to their osteopathic practice:

iO Survey 2017 – data on osteopaths using other modalities	
Massage	37%
Western acupuncture/dry needling	36%
Classical acupuncture	6%
Applied kinesiology	5%
Reflexology	2%
Pilates	22%
Naturopathy	12%
Electrotherapies	16%
Other	11%

We have no data to suggest whether protected characteristics impact on the types of adjunctive therapies undertaken.

Annex D to 13

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

We will continue to gather data in relation to our EDI policy and our general function..

In order to make sure that we are not inadvertently discriminating against people with particular protected characteristics (patients or osteopaths) as a result of this guidance, we will explore this issue as part of our consultation.

Step 4 – assessing impact and strengthening the policy

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

This is guidance aimed at clarifying issues around the application and implementation of the Osteopathic Practice Standards, rather than the implementation of a new policy. We will ensure during formal consultation that we seek feedback specifically relating to impact on those with protected characteristics and we will have a specific question in relation to this as part of our consultation questions.

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

We are not aware of any such implications at this stage.

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

We will explore this during the consultation phase.

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

The focus of the guidance is around the application of standards in relation to therapeutic and other work undertaken by osteopaths which might be classified as 'non-osteopathic'. We have tried to ensure that the case scenarios included within the draft are representative. It is hoped that by making the issues more transparent it will make decisions in this area clearer for osteopaths and patients.

Annex D to 13

Step 5 – making a decision

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

We will review this once the development and consultation have been completed.

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

To be considered as a result of the consultation.

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

To be considered as a result of the consultation.

Step 6 – monitoring, evaluation and review

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

We will monitor and evaluate the impact of the guidance within fitness to practise decision making.

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

To be reviewed as set out above.

Where/how will this EIA be published and updated?

The EIA will be published alongside the published guidance on our website.

Step 7 – action planning

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

Action	Owner	Date
Review in relation to the consultation process and its outcomes	Policy Manager	
Review of guidance, consultation document, consultation strategy and equality impact assessment. Insertion of additional groups in consultation strategy and additional questions into the consultation document about equality, diversity and inclusion prior to PEC paper being approved.	Director of Education, Standards and Development	20.09.2021