

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.
 - 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. 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.

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

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.
- We will build closer relationships with the public² 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 businesses³. 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.

² 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.

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 1998⁴.

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 characteristic⁵ 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.

⁴ 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. Similar equalities legislation applies in Northern Ireland although there are also some additional explicit duties, for example, promoting equality of opportunity among persons of different religious belief, political opinion.

⁵ 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.

- 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, though 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 <u>Welsh</u> <u>Language Scheme</u>.

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 practice.

- 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.

- 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 nonexecutives.
- 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 underrepresented 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.