



General  
Osteopathic  
Council

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

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## 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. 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)

4. We are the independent statutory regulator for the osteopathy profession in the UK, established through the Osteopaths Act 1993.
5. 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 wellbeing 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.
6. We also have responsibility to develop and regulate the profession of osteopathy as outlined in Section 1(2) of the Osteopaths Act 1993.
7. We achieve our over-arching objectives and responsibilities by:
  - 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 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.
8. 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.

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

9. 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 bias or discrimination or exclusion based on individual characteristics.
10. We understand that we have a critical role to encourage and promote EDIB to osteopaths so they are able to identify the benefits this can have in how they interact with, communicate and work in collaboration with patients to avoid bias or discrimination.
11. We understand that to be the best possible version of our organisation, we must attract, develop, motivate and retain talented people across the breadth and depth of our business and that every member of staff and non-executive 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.
12. 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.

## Our Strategy: vision and priorities

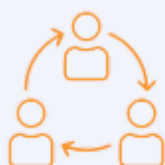
**Our vision:** to be an inclusive, innovative regulator trusted by all.

### 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.



### Collaborative

We work with our stakeholders to ensure patients and osteopaths are at the centre of our approach to regulation.



### Influential

We seek to support and develop those we work with to enhance public protection.



### Respectful

We seek to hear, understand and consider the views of the people with whom we engage.



### Evidence-informed

We use a range of evidence to guide our work to ensure the best outcomes for patients and the public.

## **Our Equity, Diversity, Inclusion and Belonging objectives**

13. Our EDIB objectives are best described against our commitment to:

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

### **Promote equity**

14. We will ensure that our regulatory activities are fair, taking account of existing inequalities, and free from unlawful discrimination, and that this approach is reflected in the standards we set for the osteopathy profession. We will ensure the fair treatment of people so that our practices and policies mean identity is not a predictor of opportunity or outcome. 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**

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

### **Embrace inclusivity**

16. Diverse and inclusive organisations outperform homogenous businesses<sup>2</sup>. We will ensure our culture and values enable those who wish to work with us – including 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 taken into account fully with respect and dignity.

### **Create belonging**

17. 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 feel can be creative and innovative, and can constructively challenge existing practices for the benefit of patients, osteopaths and stakeholders.

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

## How the framework will guide our approach to Equity, Diversity, Inclusion and Belonging

**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>3</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>4</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 and recognition of inequalities influence our decisions in developing policy, in delivering services, and in our role as an employer.
20. 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.
21. Complying with the duty may involve treating some people differently, recognising the impact of inequalities. For example, the duty recognises that the needs of people who have an impairment are different from the needs of others, which may mean making reasonable adjustments.
22. Recognising that we must foster good relations also means recognising that we must tackle prejudice and promote understanding.
23. 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.

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<sup>3</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>4</sup> The relevant protected characteristics are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

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

24. It is important to recognise there will never be a 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 and contract with and those who engage with us and our services
  - how we communicate
  - how we plan, implement, monitor, evaluate and learn.
25. 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.
26. 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 including performance against our next steps outlined in the Annex to the framework.
27. 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.
28. Audit Committee and People Committee will support Council by, where appropriate, conducting reviews into aspects of the EDIB Framework to ensure compliance and will advise Council accordingly.
29. 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.
30. We will also explore how we report on our EDIB activities and whether we should introduce a formal report we produce and publish each year, similar 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.

31. 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 the future looks like within our context, we can take practical steps to deliver that outcome.

32. 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 steps we will take:** ensuring that EDIB is threaded through all that we do.

33. 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.

34. The annex to the framework highlights the practical steps we will take to deliver future success and to ensure EDIB is threaded throughout our organisation.

## The current position

**Our baseline:** Over the previous five years we have made progress integrating equality, diversity and inclusion so that it is more present 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 when 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, education providers, patients and others. The Graduate Outcomes set out what the GOsC expects osteopathic education 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.
- Within the Graduate Outcomes and Standards for Education, we set out expectations for osteopathic education providers about 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.
- We carry out ongoing evaluation of our Continuing Professional Development (CPD) Scheme which looks at results from certain questions in our CPD evaluation survey and checks these alongside the eight protected characteristics (information on this is also provided by those answering the survey). This helps us to identify whether there are barriers for anyone taking part in the scheme. We report results to our Policy and Education Committee and to Council.
- We analyse data on behalf of the Council of Osteopathic Educational Institutions (COEI) to have a sector wide understanding of how diverse the recruitment of students studying osteopathy is. This includes sex, age, race and ethnicity, nationality/place of origin and disability.

### Registration

- We collect a limited set of equality monitoring data from those applying to join our Register of osteopaths (age, gender, disability, sexual orientation, religion/belief, ethnic origin). We have no existing process for systematically collecting updated data from our those on our Register.
- We are working to implement a new CRM system which will make it easier for us to collect data when osteopaths renew their registration. This will allow us to collect 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 registration report for Council every six months which includes the equality data for entry to, and exit from, the Register. Recently, as part of this report we have expanded the type of 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 recruitment and selection processes have been changed to use more accessible language and more diverse imagery. We have expanded where we place advertisements to attract new people to our organisation, and we have introduced training for our selection panels to ensure their approach is free from bias and creates an inclusive experience for those who are being interviewed.
- We continue to see an increase in the diversity of those applying for our non-executive positions, across the full range of protected characteristics. The data we collect demonstrates our current approach to recruitment campaigns attract a greater number of applicants with significantly more diversity than the campaigns we ran in 2019.
- We collect and analyse equality monitoring data from our staff and non-executives, with a 74% response rate from staff (20 responses from 27 people) and an 80% response rate from non-executives (41 responses from 51 people) in 2024.
  - The staff equality monitoring data shows 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.
  - The non-executive equality monitoring data demonstrates that GOsC's 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) and we will need to continue to monitor this by looking at incomplete and shortlisted recruitment campaign data.
- We carry out staff surveys every two years and report on the findings to our People Committee, which cover areas including mental health and wellbeing, recognition and feedback, job satisfaction, personal development, relationships with managers and relationships with peers. Our last survey was in 2022.

## Communication and research

- We have co-funded research into the experiences of under-represented groups in osteopathic education and training, and have agreed funding for research into the reasons why osteopaths may choose to leave the GOsC Register. The findings of these projects may reveal issues related to EDIB which we are currently unaware of.
- We are working towards making the website more accessible for those who use it. We have not made as much progress as we would have liked, having to first complete the implementation of the new CRM which integrates into the website. We will be updating our website in the future with funds committed from GOsC reserves.
- We make our Register available online and we answer registration queries by telephone for those who cannot access the Register. We have information about [accessibility on the website](#) and we aim to meet level 2.
- We design all of our materials and resources to meet high standards of readability and a range of learning styles. We draw upon best practice in the use of typefaces, fonts and colours to enhance accessibility.
- We use images (photos and illustrations) to reflect diversity in our recruitment materials and throughout our social media posts, print publications and on our website.
- We positively promote awareness of equality, diversity, inclusion and belonging through our social media. For example changing our GOsC profile picture on social media to incorporate the rainbow flag during Pride month, and promoting Black History Month and mental health awareness campaigns. We also recognise 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 those involved in fitness to practise hearings, whether they are witnesses or osteopaths.
  - [Guidance for witnesses](#)
  - [Guidance for registrants](#)
- Our Hearings and Sanction Guidance includes 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 need to carry out a full review of our all guidance for the initial stages and hearings stage of the fitness to practise process, to ensure the guidance adequately addresses allegations that involve racist and discriminatory behaviours.
- We provide annual training for all fitness to practise panel members, with new members receiving training tailored to meet the requirements of their role.

- We published a consultation on our revised draft Guidance about Professional Behaviours and Student Fitness to Practise which includes expectations about speaking up and not being racist or discriminatory.
- We anonymise equality monitoring data for osteopaths 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.
- We collect equality monitoring data from those making complaints, although we need to recognise that we have a limited number of complaints each year and not every person making a complaint provides the monitoring data. This means that useful analysis at this stage is limited.

## Looking ahead

**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 the organisation, including but not limited to the actions we have explained below.

### Education, standards and policy

- We will be able to demonstrate the progress we have made working with osteopathic education providers to equip students and osteopaths to provide appropriate care to patients. (NB: this will meet a PSA requirement)
- We will be able to demonstrate that we have been engaging with osteopathic education providers and other stakeholders to improve the diversity of new students and those that progress from first to second year of study (NB: this will meet a PSA requirement).
- We will be able to 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).
- Where relevant, we will update the Osteopathic Practice Standards and Graduate Outcomes and any associated guidance we have issued, to clearly describe the expectations regarding EDIB on students, osteopaths and education providers, and how these expectations benefit patients and/or their care.
- We will have a better understanding of health inequalities within the wider society and will use our influence to articulate how osteopaths are positioned to help address those inequalities.

### Registration

- We will routinely collect, analyse and publish equality monitoring data, across the full range of protected characteristics, related to osteopaths.
- We will be able to 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 will publish an Annual EDIB Report that can inform the healthcare and osteopathic sector by providing the analysis of the data we collect and the work we undertake.
- We will be able to demonstrate that our staff and non-executives (across all our governance committees) reflect the diversity of society (NB: this will meet a PSA requirement) and the profession we regulate.
- We will be able to demonstrate that our recruitment processes for staff and non-executives attract a wide range of diverse applicants across protected characteristics, and other characteristics (i.e. neurodiversity) which are not protected, and that every stage of our recruitment processes is free from bias and discrimination.

- We will be able to 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, osteopaths and stakeholders in a variety of formats, ensuring that we are inclusive of different learning styles and needs.
- We will reach AA accessibility status on our new website.
- Our website will contain 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 will be able to 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 equality monitoring data from those involved in fitness to practise processes.
- We will be able to demonstrate that the guidance and materials which relate to all aspects of fitness to practise robustly address matters connected to EDIB.
- We will ensure all decision makers within the fitness to practise processes undergo regular, context specific training on EDIB to ensure that our decisions are fair, proportionate and free from bias and discrimination.

## Achieving change

**How are we going to achieve future success?** The following activities 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 equality monitoring data across the full range of protected characteristics.
- Published for consultation the draft guidance for students with a disability or health condition, and have started analysis of the consultation responses.
- Progressed the website technical scoping activity which will pave the way for a new and more accessible public website.
- Completed the 2024 staff survey and started analysis of the results.

### **By end July 2025, we will have:**

- Collected six months of osteopath equality monitoring data through the new CRM system (NB: we do not have a single point in time where every osteopaths renews their registration, so renewal happens monthly)
- Carried out a full comprehensive review, and made amendments to, all fitness to practise guidance both at the initial and hearings stages of the fitness to practise process, to ensure the guidance adequately addresses allegations that involve racist and discriminatory behaviours.
- Published the final version of the guidance for students with a disability or health condition.
- Completed the specification for the new CMS and for the development and build of a new and more accessible website, which better meets the needs of our all who use it.
- Started a review of our staff and non-executive recruitment processes to ensure our approach is inclusive and does not contain avoidable barriers to entry.
- Reported on the results of the staff survey to People Committee and to the GOsC staff team.

### **By end July 2026, we will have:**

- Published our first EDIB Annual Report which includes an analysis of our registration equality 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, assessed its effectiveness and implemented changes to ensure its ongoing relevancy to our work.
- Reviewed our staff and non-executive recruitment processes and identified further measures we can introduce to ensure we continue to attract high-quality, diverse talent.