Equality, Diversity and Inclusion – draft policy statement (MARCH 2021)

Background

The General Chiropractic Council (GCC) is the regulator for the chiropractic profession in the UK. Our overall purpose is to protect the public and regulate the profession of chiropractic.

Our approach to Equality, Diversity and Inclusion (EDI) is critical to the successful delivery of our strategy and we see it as critical that it is embedded through all that we do.

We meet our statutory obligations and we have made progress over the last few years but it is important that from time to time we consider our approach and refresh what we do. That is the purpose of this statement and associated plan of action.

About the GCC

By law, the General Chiropractic Council has a statutory duty to develop and regulate the profession of chiropractic. This means that we have a duty to:

- Protect, promote and maintain the health, safety and well-being of the public
- Promote and maintain public confidence in the profession of chiropractic
- Promote and maintain proper professional standards and conduct for members of the chiropractic profession.

As an organisation, our focus is on delivering against our core strategic aims to:

- Promote standards: We will set, assure compliance and promote educational, professional and registration standards alongside lifelong learning
- Develop the profession: We will facilitate collaborative strategic work to support the profession in its development
- Investigate and act: We will take right touch action on complaints, the misuse of title or where registration standards are not met
- Deliver value: We will be a great place to work, work collaboratively and deliver effective and efficient services.

As the UK’s regulator of chiropractors, we take our duties very seriously. It is vital that:

- Patients and the public can be assured that they are seeing a well-trained and competent chiropractor. Should they have any concerns about a chiropractor, we will investigate them and act if necessary
Registered chiropractors and UK professional bodies feel engaged with the work we do to promote standards and develop the profession and are able to collaborate with us should they wish to. The profession values our approach to best practice to enable continuous learning and is confident in our right touch approach to regulation.

Key stakeholders want to work with us to uphold our core duties to protect patients and improve professional standards and trust us to deliver effective and efficient services.

What does EDI mean to us?

In short, we promote equality, value diversity and embrace inclusivity:

- To promote equality, we will ensure that our regulatory activities are fair and free from unlawful discrimination and that this is reflected in the standards we set. And in doing this, we will also promote equality of opportunity and access to the profession.
- To value diversity we must be deliberate about recognising difference and the need to make adjustments based on those differences. In communicating, for example, we will do so in an accessible and timely manner. We recognise the strength which comes from diversity and value this in recruitment and development of non-executives, our people, partners and other stakeholders.
- To embrace inclusivity, we will make sure we look like the community in which we work so we do not appear exclusive. This of course includes our staff and colleagues across all that we do (including regulatory committees) and also how we appear externally - for example our website, our recruitment materials and our behaviour.

Why? Work in furthering EDI, done well, is integral to how we meet these obligations and objectives. Taking account of different needs and embracing diversity makes us stronger.

How does that look and feel? We aim to behave consistently, and apply processes consistently, and fairly towards everyone we work with, valuing and respecting their views and interests, and eliminate activities that may result in discrimination or exclusion, based on individual characteristics.

Can we influence the profession? We can encourage and promote EDI to registrants to enhance their awareness and how they can be more deliberate in how they interact, communicate and work together with patients and their colleagues and the community in which they work. We have started a dialogue with registrants about this and believe we can learn from each other.

What about us and our people? We are a diverse staff team and our vision for the organisational environment of the GCC is encapsulated in this statement:

The GCC is a great place to work, and we do so together. It matters to us that we make a real difference in protecting the public and developing the profession. We are positive and work hard – we support, value, care and trust each other. We innovate, embrace diversity and our growth. The GCC has talented and committed people. To
retain these skills, attract future talent and equip our people for future challenges we want to provide an environment where colleagues are motivated to work at a consistently high standard.

We expect our people partners 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 objectives.

**The legal context**

As an employer and as a regulator the GCC is subject to the requirements of the Equality Act 2010 and the Human Rights Act 1998.

The Equality Act also requires that as a public body, when carrying out its functions, the GCC must have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act.
- advance equality of opportunity between people who share a protected characteristic and persons who do not
- foster good relations between people who share a relevant protected characteristic and persons who do not.

These are sometimes referred to as the three aims or arms of the general equality duty. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.
- The Act states that meeting different needs involves taking steps to take account of disabled people’s disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

The equality duty covers the nine protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first aim of the duty applies to this characteristic but that the other aims (advancing equality and fostering good relations) do not apply.
Progress in enhancing our commitment

In 2020 we:

- Overhauled our recruitment pack for the appointment of staff and partners to demonstrate our commitment to being inclusive, enhancing the diversity of the staff, partners and Council.
- Revised all HR policies; undertook staff survey confirming (amongst other things) alignment between staff and GCC values.
- Held an all-staff facilitated seminar following the death of George Floyd exchanging views and gathering feedback from our black, Asian and minority ethnic colleagues.
- Mandated EDI training for all staff including a programme delivered by the Diversity Trust and ‘unconscious bias’ training to staff and partners.
- Updated monitoring forms; emphasised the importance of gathering data from staff and partners. And we have published data on recruitment campaigns, for example regulatory committee member recruitment.
- Undertook research of registrants, amongst other things, reinforcing our knowledge from data we hold on protected characteristics.
- Undertook research into perceptions of what the public expect from their interaction with a professional and what they expect from a regulatory body.
- Held two workshop sessions with a broad range of registrants to gather their views and ideas on steps we can collectively take to promote EDI within the profession and the impact on patients.
- We are publishing more information relating to EDI aspects in our newsletter and website – for example a blog on how racism affects a person of colour in the profession.
- Monitoring and analysing data more methodically, for example as part of our annual monitoring of degree programmes.
- Produced Equality Impact Assessments of proposed new policies – in relation to our new raising concerns (whistleblowing policy); our website management policy; customer complaints policy and remote hearing protocol.
### Action plan 2021

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<tr>
<th>Action</th>
<th>By when</th>
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<tbody>
<tr>
<td>Publish and promote EDI policy</td>
<td>April 2021</td>
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<td>Review and update EDI page on website</td>
<td>April 2021</td>
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<td>Ensure newsletter content of identified themes around EDI on a regular basis</td>
<td>April 2021</td>
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<td>Update our Equality Impact Assessment template and provide guidance for staff on how and when to use the document</td>
<td>June 2021</td>
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<td>Develop more systematic methods for reviewing EDI data on our staff, partners and non-executives</td>
<td>June 2021</td>
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<td>Consider EDI as part of development of new Corporate Strategy for 2022-25</td>
<td>September 2021</td>
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<td>Conduct an audit of our progress on EDI</td>
<td>September 2021</td>
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<tr>
<td>Develop metrics for reviewing the progress of EDI outcomes for incorporating within annual report</td>
<td>December 2021</td>
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