

GCC Policy Statement

Equality, Diversity and Inclusion

Policy purpose

1. The General Chiropractic Council (GCC) is the UK's regulator for the chiropractic profession. Its overall purpose is to protect the public and regulate the chiropractic profession.
2. The GCC approach to Equality, Diversity and Inclusion (EDI) is critical to successfully delivering its corporate strategy in two significant ways. The first is ensuring all patients are served and treated fairly and equally and provided the best care possible by registrants. The second is by continually developing and promoting standards within the chiropractic profession.
3. EDI is embedded into the aims of the GCC corporate strategy. However, the GCC does not see EDI as a tick-box exercise, the responsibility of only one person to complete, or an additional activity which needs to be 'seen' to be done. It is incumbent on us all, employees, registrants and stakeholders, to embrace and deliver EDI.
4. As a regulator and employer, the GCC fosters change, raises awareness and sets expectations for all individuals and groups with whom it interacts. The GCC will call out where and when it sees discrimination, inequality, or exclusion. Where change is required, the GCC will act. The GCC will work to create a culture that values difference and champions the contributions that people can make from all backgrounds and experiences.
5. This policy statement outlines the GCC's EDI principles, approach, modelling and actions. It will detail how the GCC will monitor the progress to achieve these outcomes by collecting and using EDI data from registrants, employees, and education and Fitness to Practise activities.
6. The GCC encourages all registrants, clinics and organisations to review and adopt the principles of this policy or use this document as a template to develop an EDI policy suitable to their circumstances.

Aim of the policy

7. This policy aims for the GCC to meet the requirements in law so that any person who has contact with the GCC and the UK chiropractic profession will be treated fairly, with respect, and without discrimination. Fair treatment and respect for the individual are inherent within this policy.

Scope of the policy

8. This policy applies to individuals at all levels within the General Chiropractic Council, including the GCC Council, employees, registrants, contractors, and all job applicants applying for GCC vacancies.

About the General Chiropractic Council (GCC)

9. The General Chiropractic Council has a statutory duty to develop and regulate the chiropractic profession, meaning it will:
 - protect, promote and maintain the public's health, safety and well-being.
 - promote and maintain public confidence in the chiropractic profession.
 - promote and maintain professional standards and conduct for registrants of the chiropractic profession.
10. In performing these duties, it is vital that:
 - patients and the public see a well-trained and competent chiropractor.
 - all people feel free to raise concerns about a chiropractor to the GCC via its [complaints process](http://www.gcc-uk.org/make-a-complaint), which will investigate and act if necessary. (www.gcc-uk.org/make-a-complaint)
 - registered chiropractors and UK professional bodies feel engaged and empowered to promote standards, develop the profession, and collaborate with the GCC.
 - stakeholders want to work with the GCC to uphold its duties to protect patients, improve professional standards and trust it to deliver effective and efficient services.
11. The GCC meets its statutory duties through the delivery of its four strategic aims:
 - placing patients and their care at the centre of all GCC work.
 - promoting continuing chiropractic best practices, professionalism and value within the health and social care system.
 - regulating effectively, efficiently, innovatively and inclusively by achieving all requirements laid out in UK legislation.
 - enhancing the nature and form of regulation for the profession for the future.

Defining Equality, Diversity and Inclusion

12. Equality, Diversity and Inclusion, or EDI as it is more commonly known, ensures fair treatment and opportunity for all. It aims to eradicate prejudice and discrimination based on an individual or group of individuals' protected characteristics.
13. EDI is about integrating and embedding the behaviour of inclusion and diversity into a corporate or professional culture while ensuring all organisation planning, functions, and processes are aligned to advance equality. It

understands how internal and external activities can be equal and fair to everyone. Individually, it is accepting and embracing people and their unique experiences, background, and contribution they can make.

14. Although EDI has some universal norms, its definition varies depending on national and cultural beliefs and values. However, a simple explanation of EDI as it applies to this policy is:
 - **Equality:** At its core, equality means fairness: ensuring that individuals, or groups of individuals, are not treated less favourably because of their protected characteristics. Equality relates to the legal obligations in which organisations must not unlawfully discriminate. Equality does not mean treating everyone 'the same' but recognising that everyone is an individual with different needs that need meeting.
 - **Diversity:** Diversity is about recognising and celebrating visible and non-visible differences. It acknowledges the benefits of having a range of perspectives in an organisation's operations and decision-making and taking steps to aid and encourage that diversity.
 - **Inclusion:** Inclusion is where people's differences are valued and used to enable everyone to thrive in that organisation. An inclusive organisation is one in which everyone feels they belong without conforming. Everyone's contribution matters and they have the opportunity to perform to their full potential, no matter their characteristics, background, identity, or circumstances.

Sex/gender and granularity

15. The GCC defines sex as male and female, in its simplest definition, and is a person's biological makeup. The GCC also recognises Intersex, which describes sex characteristics outside the binary male and female definitions.
16. Gender is different from sex and is a set of socially constructed characteristics that accompany the sex assigned to a person at birth, ie. masculine or feminine (again in its simplest form). The gender of a person is considered fluid within a spectrum of expressions and behaviours. People are positioned anywhere on this spectrum according to their own beliefs or that of their society (gender identity). The World Health Organisation recognises gender to be hierarchical. It results in inequalities that intersect with other social and economic inequalities, for example, ethnicity, sexual orientation, disability, and geographic location. This is known as intersectionality.
17. Sex is a protected characteristic in the UK, and gender is not. The GCC does not collect gender-related data from its registrants.
18. There remains confusion in using the words sex and gender. The Office of National Statistics recognises this confusion and states that this issue needs resolution and better understanding.

19. The GCC also acknowledges that more options are available for some protected characteristics, eg. race, religion and sexual orientation. Infinite granularity prevents the identification of trends, so the decision not to present all possible options, ie. there are over 20 sexual orientation preferences, is to assist in the submission and more straightforward reporting of EDI data from individuals. The lack of granularity does not reflect a GCC position on an individual's race, religion or sexual orientation, for example. It is also important to highlight those Equality Act protections can and have been extended by case law. Therefore, equality legislation should not be considered 'set in stone' but rather something that evolves and adapts to accommodate our society and protect those at risk of discrimination.

What does EDI mean for the GCC and the chiropractic profession?

Principles

20. EDI is an essential and integral requirement for everyone within the GCC, helping it to become a fully inclusive organisation. It is the keystone for all the GCC undertakes and achieves.
21. The GCC will encourage its principles to promote equality, value diversity and embrace inclusivity as an integral part of its culture and the profession it regulates.
22. The GCC recognises the impact and effects of historical disadvantage and past discrimination and is committed to developing, implementing and monitoring effective policy, strategy and standards to achieve equal opportunity for all.
23. The GCC recognises that EDI must become a cultural approach, not a box-ticking exercise. The GCC will implement a robust EDI policy (this document) that delivers this intent.
24. The GCC will achieve its EDI aims by employing the following principles:
 - **promote equality**; the GCC will ensure its regulatory activities are fair and free from unlawful discrimination, as reflected in its standards. The GCC will also promote equality of opportunity and access to the profession.
 - **value diversity**; the GCC must be deliberate about recognising differences and the need to adjust based on those differences, communicating specific needs in an accessible and timely manner. The GCC recognises the strength of diversity and values this in recruiting and developing non-executives, its employees, partners and other stakeholders.

- to ensure it **reflects the community it regulates** through embracing inclusivity. This inclusivity includes its employees and colleagues across all activities, including regulatory committees and how we appear externally, such as its website, recruitment materials, external influencing and behaviour.

Reasoning

25. **Why?** Furthering equality, diversity and inclusion are integral to meeting these principles. Taking account of different needs and embracing diversity makes us stronger. The GCC expects its employees, partners, stakeholders, and non-executives to be committed to EDI, meeting its equality duties and the principles that support its strategic aims.
26. **How does this look and feel?** The GCC will behave and apply processes consistently and fairly towards everyone it works with, valuing and respecting their views and interests and eliminating activities that may result in discrimination or exclusion based on individual characteristics.
27. **Can the GCC influence the profession?** The GCC can foster and encourage registrants to enhance their awareness of EDI through a programme of publicity and training to support this policy. This work will address topics such as how EDI relates to clinical practice, unintentional prejudices and unconscious bias, thereby allowing more considered and deliberate interaction, communication and effective partnerships with patients, colleagues and the community in which they work.
28. **What about its employees?** The GCC has a diverse employee team. Its vision for the organisation is encapsulated in the following statements:

"The GCC is a great place to work, and we do so together. We are optimistic, work hard and support, value, care and trust each other. It matters to us that we make a real difference in protecting the public and developing the profession.

"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 innovate, embrace diversity and our growth."

The legal context of EDI to the GCC

29. As a regulator and employer, the GCC is subject to the legal requirements of the Equality Act 2010 and the Human Rights Act 1998.
30. As a public body, the Equality Act requires the GCC to carry out its functions and 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 those who do not.
- foster good relations between those who share a protected characteristic and those who do not.

31. The Equality 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 that differ from others.
- Encouraging people from protected groups to participate in public life or other activities where their participation is disproportionately low.
- Meeting the different needs of a person's physical or mental abilities and taking steps to address those needs.
- Fostering good relations by tackling prejudice and promoting understanding between people from different groups.

The Act states that compliance with this duty may involve treating some people more favourably than others.

32. The Equality Act covers the nine protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

33. Public authorities also have due regard to eliminating unlawful discrimination against someone because of their marriage or civil partnership status. This requirement means that the first aim of the duty, ie. removing or minimising disadvantages suffered by people due to their protected characteristics, applies to this characteristic but that the other aims (advancing equality, fostering good relations etc.) do not.

EDI data collection, application through progression modelling and responsibility

Data collection

34. The GCC collects EDI data from its registrants, committee members, employees (prospective and employed) and those involved in Fitness to Practise investigations. Education Providers are also encouraged to provide undergraduate EDI data through course approval and monitoring mechanisms.

35. The GCC collects data on seven of the nine protected characteristics:
- Age
 - Disability
 - Gender reassignment/trans status
 - Race (including colour, nationality, and ethnic or national origins)
 - Religion or belief
 - Sex
 - Sexual orientation
36. For Information Commissioner's Office (ICO) General Data Protection Regulation (GDPR) reasons, the GCC does not collect maternity/civil partnership or pregnancy and maternity data.
37. The GCC has adopted a four-stage EDI model to monitor its progression:
- Initiating:** Use of data gathering and insights to determine if and where action for change is required.
- Developing:** Data will justify the need where action for change is required. The responsibility and accountability to lead any change will be established, and a programme for change will be initiated.
- Engaging:** Data continues to be collected, shared, reviewed, and actions enabled to show change is being initiated.
- Transforming:** The GCC's culture, activities, and functions have changed and continue to change to reflect data insights gathered during the initiating stage.

Responsibility

38. Equality, diversity and inclusion are the responsibility of all those who work with the GCC, from employees to committee members and registrants. This shared responsibility is enabled through progression modelling, which works best when all those involved in activities work together, providing open, honest and varying perspectives. It is further enabled through collaborative working, which helps promote dialogue, understanding and inclusiveness and further embeds the principles of EDI throughout the organisation and profession.

EDI Policy adoption and external use

39. This policy statement will be the keystone to all GCC EDI activity and will guide its future ethos in all matters surrounding equality, diversity and inclusion.
40. As outlined in points 19-27, this policy goes beyond an internal ambition for the GCC. It aims to encourage all within the chiropractic profession to

understand and appreciate the value equality, diversity and inclusion can have on the individuals and communities it serves.

41. The GCC encourages all registrants, clinics and organisations to review and adopt the principles of this policy or use this document as a template to develop an EDI policy suitable to their circumstances.

Version control

This policy statement was published in September 2022 and supersedes:

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General Chiropractic Council

Park House
186 Kennington Park Road
London
SE11 4BT

T: +44 (0) 020 7713 5155

E: enquiries@gcc-uk.org

W: www.gcc-uk.org