

Equality, Diversity and Inclusion

GCC 15-point action plan

December 2021

Realising the value of equality, diversity and inclusion

Put simply, **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 on the basis of an individual or group of individual's protected characteristics¹.

Sadly, although much is written about EDI and its importance, few tangible actions are undertaken by many organisations to accept, adopt and integrate EDI into their corporate culture. In essence, EDI becomes a tick-box exercise creating added value to annual reports or employee meetings, with little substance or commitment.

To be fair, many people and organisations do not fully understand or appreciate EDI and the value it can create. For an organisation, EDI is often thought to be a simple data collection exercise from their recruitment processes or employee surveys which can be reported against an agreed set of metrics. This is not EDI.

EDI is about integrating and embedding the behaviour of inclusion and diversity into a corporate or professional culture while ensuring all planning, functions and processes of the organisation are aligned to advance equality. It is understanding how internal and/or external activities can be made equal and fair to all people. On an individual basis, it is accepting and embracing people and their uniqueness beyond those of yourself.

For equality, diversity and inclusion to become a living part of a corporate culture, all people connected with that organisation must be on the same path and willing to accept and appreciate the cultural and societal mosaic in which we live.

The aim of this 15-point action plan is to build upon the General Chiropractic Council's current Equality, Diversity and Inclusion activity and help it move further towards realising its EDI goals and ambitions ie. creating an internal culture of understanding and engagement, as well as influencing and guiding the profession that it regulates. Its purpose should not be interpreted as a response to passing any external audit or requirement but as a genuine desire by the regulator to ensure it, and the profession it oversees and serves, is as diverse and inclusive as possible, providing equal opportunities for all chiropractors and the patients and customers that they ably serve.

¹ University of Edinburgh

Defining equality, diversity and inclusion

Although EDI has some universal norms, its exact definition varies depending on national and cultural beliefs and values. However, a clear definition of EDI 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.

Key takeaway: **treated less favourably**

Diversity

Diversity is about recognising difference. It's acknowledging the benefits of having a range of perspectives in an organisation's operations and decision-making and taking steps to aid that diversity.

Key takeaways: **acknowledging benefits, taking steps**

Inclusion²

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 that they belong without having to conform, that their contribution matters, and they are able to perform to their full potential, no matter their characteristics, background, identity or circumstances.

Key takeaway: **valued and used**

What are protected characteristics?

The UK's protected characteristics stem from the Equality Act 2010, which brought together several pieces of legislation under one act eg. Race Relations Act 1976. In essence, they are characteristics of a person's identity which make them who they are. As such, if a protected characteristic is known or revealed, it is unlawful to treat that person differently.

As with defining EDI, protected characteristics vary between nations ie. the UK defines nine characteristics while USA has eight, and not all are the same. In the UK, protected characteristics are (in alphabetical order):

1. Age

Unfair or unfavourable actions, language or treatment of people due to their age eg. treating people differently or dismissing/restricting their roles due to their age. This applies to both young and old.

2. Disability

Prejudice against people with long-term (12-month+) mental or physical disabilities alongside failure to make sufficient adjustments to remove hindrances or barriers caused by the disability.

² Sex, not gender website (Alan Henness email 16 November 2021)

3. Gender reassignment

The law protects trans men and women regardless of any medical process eg. a trans man who was assigned female identity at birth but has a male gender identity and lives as a man.

4. Marriage and civil partnership

This is treating people differently on account of their relationship status, be it between a man and a woman or members of the same sex.

5. Pregnancy and maternity

This is victimising or being unfair to a woman due to their pregnancy or for being on maternity leave.

6. Race

Discrimination against a person, directly or indirectly, due to their race, colour or nationality. Direct discrimination is, for example, rejecting any application due to nationality, race or colour (real or perceived by name). Indirect discrimination is placing procedures or policy which places people at a disadvantage ie. placing a requirement for a UK-only qualification which then restricts the opportunity for others to apply.

7. Religion or belief

This is where a person is discriminated against due to religious or cultural beliefs eg. not recruiting or dismissing a person due to their religion (direct) or placing barriers to allow a person to practise their religion, such as holding meetings at the same time as prayers (indirect).

8. Sex

This is treating a man or woman differently because of their sex, including positive discrimination. Common examples are, asking job applicants different questions due to their sex or not promoting women due to future pregnancy concerns. Remember, sex is not gender.

9. Sexual orientation

This is where people are discriminated against for being gay, bisexual, heterosexual or asexual ie. treated less favourably due a person's emotional, romantic or sexual attraction to another person.

These are not comprehensive definitions of protected characteristics. In addition, types of discrimination go beyond direct and indirect eg. associative (associating with someone with a protected characteristic), perceptive (being thought to have a protected characteristic), victimisation (treated unfairly for supporting a complaint) etc.

15 current GCC EDI activities to note

The GCC has been active in creating, updating and improving its EDI activity over the last few years. Since 2020, it has initiated and number of projects and actions to address concerns raised by registrants, partners and the Professional Standards Authority. These include:

1. Active EDI employee engagement, including exchanging views and gathering feedback from GCC black, Asian and minority ethnic colleagues on how it can further incorporate EDI in all of its our activities.
2. Holding a thought-provoking roundtable discussion with EDI expert Rob Neil OBE who questioned and challenged attendees on their thinking and understanding of diversity and inclusion.
3. Seeking expert advice and guidance from other healthcare regulators so the GCC can benefit from their knowledge and expertise in helping to embed EDI through its entire business approach and processes.
4. Mandating EDI training for all employees, including a programme delivered by the Diversity Trust in February 2021, alongside 'unconscious bias' training to employees and partners, especially Test of Competence Assessors and Professional Conduct Committee members.
5. Updating the GCC equality monitoring form for employees, Council and Committee members, and publishing monitoring data for recent appointments to the Education Committee and Professional Conduct Committee.
6. Examining how to increase protected characteristic diversity within the GCC Council and committees, and with partners.
7. Commissioning Enventure Research to carry out a registrant survey and to produce a specific EDI report.
8. Publishing EDI data in our annual Registration Report and holding EDI data on 76% of registrants, an increase of 6% since we moved to our online registrations system.
9. Improving our understanding and knowledge of the diversity and experiences of our registrants, and their patients to identify and address how they are impacted by our policies, processes and decisions.
10. Published a series of blogs from registrants, notably on how racism affects a person of colour in the profession.
11. Asked all academic institutions how they assure themselves as to the diversity of their student intake, specifically on protected characteristics as set out in the Equality Act 2010.
12. Asked the Education Committee about their views on EDI activity, participation and performance at their institutions and all institutions have received positive feedback.
13. Reviewed our equality impact assessment (EIA) process and implemented actions identified in a timely manner. Recent EIAs have been carried out on our new Whistleblowing Policy, our Website Management Policy, Customer Complaints policy

and our Remote Hearing Protocol. We will continue to review further our EIA process and paperwork and learn from other healthcare regulators' approaches.

14. Refreshed the GCC equality, diversity and inclusion policy.
15. Created an EDI section on the GCC website.

Realising the GCC EDI 15-point action plan

As stated, EDI should not be seen as a simple tick-box exercise. It is an on-going and ever-evolving behavioural and cultural process, adapting to the changing world in which we all live. This is clearly demonstrated by the 15 activities that the GCC has undertaken in the last 24 months alone. This **15-point action plan** is the next evolutionary step in furthering the work already undertaken and helps to establish greater authority, responsibility and structure in future EDI activity.

However, all action plans need structure to ensure they are being met. The proposed activity contained within this action plan should be seen as start of the process, which will continue for as long as the GCC is in existence.

As the first action within the plan is the creation of a standing **EDI Working Group**, it would not be appropriate to define aim, objectives or a strategy. That will be left to the working group to define and agree in line with its Terms of Reference and alongside an appropriate timeframe.

GCC EDI 15-point action plan

In line with the new GCC 2022-2024 [Strategy](#), and its accompanying strategic and business plans, the GCC EDI **15-point action plan** aims to foster a transformational change in culture and behaviour by establishing support internally and securing support externally. The 15-point action plan should not be considered a numerical step-by-step action plan.

1. Creation of a standing **EDI Working Group**, taking representation and guidance from GCC (internal), the profession and EDI professionals, all of whom can provide valuable insight and advice.

The working group will lead, and be responsible for, all points within this action plan, including defining, agreeing, implementing and integrating EDI into the GCC, internally through its culture and behaviour, and externally through example-setting, guidance and support. **Q1 2022**

2. **Review of GCC functions and processes** to identify and address any possible equality issues (positive, adverse or neutral) and how best to address any of the findings ie. creation of an Equality Impact Assessment action plan. By developing and applying an EDI lens on the GCC, we will openly determine if any actions or processes throughout the organisation create unfair, less favourable or inhibitive outcomes and/or consequences, internally and externally.

Initial areas for review include recruitment (to the GCC and profession), Fitness to Practise (registrant and complainant), education (standards, profession recruitment, academic diversity (staffing and students)), registration, and corporate processes and documentation, all assessed against defined protected characteristics.

Note: The GCC has already undertaken some of this work.

3. Review, update, implement and disseminate **GCC EDI guidance**, internally and externally. Its purpose is to demonstrate why EDI is an embedded requirement within our corporate culture and behaviour, and how it is applied to our external activity and interactions with the profession.

The guidance should not be prescriptive but encourage EDI considerations throughout process or activity development alongside justifications ie. diversity in conference speakers, subject matter and justification for alternations.

4. Creation of a corporate **inclusion policy**, EDI compliant and in line with GCC guidance, as outlined in point three.
5. **Defining EDI consultation** - internal and external. This will assist the working group in establishing baseline concerns, knowledge and steer required actions.
6. Establishing a **collaborative support network** for EDI, be it with regulators, associations and the profession (individual, company, employees). This network will help to further demonstrate the value the GCC attributes to this work as well as provide a useful knowledge-transfer and support network.
7. **Review of GCC brand guidelines** (visual and voice) to ensure EDI guidance compliance.
8. Development of an **EDI data collection policy** with definable reasons and outputs, all within the Equality Act 2010 and GDPR rules and definitions ie. do not collect information on protected characteristics that are not reviewed or used and/or collect information which is not within the Equality Act itself eg. gender.

This work needs to ensure greater understanding (internally and externally) on why we collect protected characteristic data, use the correct wording and definitions as well as produce relevant actions to address any findings of concern.

9. Create **EDI communication and activation plan**. This activity will be based on many of the other actions points contained within this plan. Its purpose is to create a suitable communication framework (internal comms and external comms) with agreed timings, outputs and identifiable impact.
10. **Operational review for protected characteristics** ie. wheelchair access, home and office conditions, pregnancy rules, travel rules etc.
11. Mandatory **EDI training for GCC employees** and guidance on EDI training for the profession. This activity should go beyond top-line knowledge of the protected characteristics and help identify where and how EDI impacts each person's role. The feedback from this activity will help strengthen and embed EDI within the GCC's culture and operational behaviour.

12. **EDI within registrant Continuing Professional Development** activity.
13. **EDI patient/public research** to identify any equality, diversity and inclusion issues within the profession eg. are chiropractic patients mainly white middle class? If so, why and how can this be addressed? The findings may well be outside the scope of the GCC to enact, but should provide the professional associations with useful baseline information to address the issue/s with their members (see point six)
14. Creation of **EDI champions** within the profession, helping to identify issues and communicate the value of EDI to all target groups.
15. Create an **EDI performance tracker** to be reported annually to the GCC Council, the Professional Standards Authority, professional associations and registrants.

Reasoned activity within EDI

In undertaking this 15-point action plan, the GCC will be able:

1. **to understand and support the principles of EDI**

Through the collection of diversity and inclusion data (based on equality assessment activity). This work will ensure the GCC is continuously re-informing itself through objective non-blame review and analysis.

2. **to share with one voice its knowledge and commitment to EDI**

Essentially, ensuring EDI within our people and process development and activity through provision of support and tools to achieve our EDI goals. This is not simply a leadership voice but one for all people.

3. **to demonstrate its commitment to, and respect of, EDI**

Embedding inclusion in our policy, guidance, plans and objectives, therefore creating a behavioural norm of EDI. Ensuring diversity is encouraged, supported, represented and empowered – seen positively and not as a threat.

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