

Step 1 – Scoping the EIA

Title of policy or activity	
Guidance on Diagnostic Imaging	
Is a new or existing policy/activity?	
New guidance	
What is the main purpose and what are the intended outcomes of the policy/activity?	
<p>The guidance is designed to assist chiropractors in their decision-making around the use of diagnostic imaging.</p> <p>The guidance has been developed to help protect patients and the public as well as promote the best use of imaging for the effective assessment and care of patients. The guidance is based on the principles of evidence-based practice and informed consent.</p>	
Who is most likely to benefit or be affected by the policy/activity	
<p>The guidance supplements the Code and is for chiropractors to use when considering how the Code applies to all aspects of their work. It is also for members of the public and patients to illustrate how chiropractors approach their obligations under the Code. The guidance will act as a reference for Fitness to Practise Committees when considering concerns that chiropractors have failed to apply the Code in their practice.</p>	
Who is doing the assessment?	
Penny Bance, Director of Development	
Dates of the EQIA	
• When did it start?	June 2021
• When was it completed?	Ongoing
• When should the next review of the policy/activity take place?	Further review post consultation

Useful information

What information would be useful to assess the impact of the policy/activity on equality?
We do not have any data currently which suggests that people with particular protected characteristics will be impacted as a result of this guidance. The number of cases heard about diagnostic imaging is very low and so it would be difficult to

draw on data to demonstrate an impact for particular groups at this stage.

Is there data relating to people with any/each of the protected characteristics?¹

The GCC collects and holds EDI data on its registrants but this is not 100% complete with regard to all protected characteristics. Steps are being taken to encourage registrants to provide more information upon point of retention this year.

Where can we get this information and who can help?

We can check, as part of the consultation, whether the guidance could have an impact for people with particular protected characteristics, whether as chiropractors or patients.

Step 2 – Involvement and consultation

If you have involved stakeholders, briefly describe what was done, with whom, when and where. Please provide a brief summary of the response gained and links to relevant documents, as well as any actions.

An expert group was appointed with expertise in a range of associated areas, established deliberately to have some representation from the profession, but to be independent of it. Its composition and terms of reference were confirmed at the meeting of Council in March 2021.

A discussion paper on diagnostic imaging in chiropractic in the UK was produced for the first meeting of the expert group setting out an overview of current arrangements addressing the background of imaging in healthcare more generally and the prevalence within chiropractic; the statutory and regulatory considerations in X-ray; current guidance and expectations of practitioners; the risks of imaging; extant guidance and protocols in relation to chiropractic, and was made available to Members of Council.

The expert Group met again on 15 July 2021. The draft document was discussed at the meeting and broadly welcomed, and the overall direction supported.

A report and draft guidance was noted by Council on 28 September 2021.

To date, the consideration of the imaging review has largely been limited to the expert group and internally to the GCC and its experts. Consultation with the profession is planned ahead of the expert group reviewing the responses before a final draft is presented to Council for approval.

Step 3 – Data collection and evidence

¹ The nine protected characteristics in the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

What evidence or information do you already have about how this policy might affect equality for people with protected characteristics under the Equality Act 2010?

Please cite any quantitative (such as statistical data) and qualitative (such as survey data, complaints, focus groups, meeting notes or interviews) relating to these groups. Describe briefly what evidence you have used.

The guidance has been reviewed by key stakeholders, and no equality concerns were raised.

Our knowledge of EDI issues within the chiropractic profession is incomplete, and we do not have data to suggest whether minority ethnic chiropractors, for example, are more likely to be the subject of concerns or complaints, or the outcomes of these, though are working on this and towards collating EDI data for registrants that have been subject to FTP. But as indicated earlier, in relation to diagnostic imaging, the number of these cases is very small and it would be difficult to make any clear inferences solely from the data.

What additional research or data is required to fill any gaps in your understanding of the potential or known effects of the policy? Have you considered commissioning new data or research?

In order to make sure that we are not inadvertently discriminating against people with particular protected characteristics (patients or chiropractors) as a result of this guidance, we will explore this issue as part of our consultation.

Step 4 – assessing impact and strengthening the policy

What does the data reviewed tell us about the people the policy/activity affects, including the impact or potential impact on people with each/any of the protected characteristics?

This is guidance aimed at clarifying issues around the application and implementation of the Code, rather than the implementation of a new policy. We will ensure during formal consultation that we seek feedback specifically relating to impact on those with protected characteristics and we will have a specific question in relation to this as part of our consultation questions.

Are there any implications in relation to each/any of the different forms of discrimination defined by the Equality Act?

We are not aware of any such implications at this stage.

What practical changes will help to reduce any adverse impact on particular groups?

We will explore this during the consultation.

What could be done to improve the promotion of equality within the policy?

The focus of the guidance is around the application of standards in relation to the utilisation of diagnostic imaging by chiropractors.

It is hoped that by making the issues more transparent it will make decisions in this area clearer for chiropractors and patients and promote the best use of imaging for the effective assessment and care of patients.

Step 6 – making a decision

Summarise your findings and give an overview of whether the policy will meet the GCC's objectives in relation to equality.

We will review this once the development and consultation have been completed.

What practical actions do you recommend to reduce, justify or remove any adverse/negative impact?

To be considered as a result of the consultation.

What practical actions do you recommend to include or increase potential positive impact?

To be considered as a result of the consultation.

Step 6 – monitoring, evaluation and review

How will you monitor the impact/effectiveness of the policy/activity?

Should we received feedback from those that use the policy, either staff in its application or those that raise concerns under it, that improvement can be made, the policy will be updated where appropriate. The policy will be reviewed regularly to ensure the contents are current.

What is the impact of the policy/activity over time?

We will monitor and evaluate the impact of the guidance within fitness to practise decision making.

Where/how will this EIA be published and updated?

The EIA will be published on our website alongside the published guidance.

Step 7 – action planning

Please detail any actions that need to be taken as a result of this EIA

Action	Owner	Date
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Review in relation to the consultation process and its outcomes	Director of Development	