

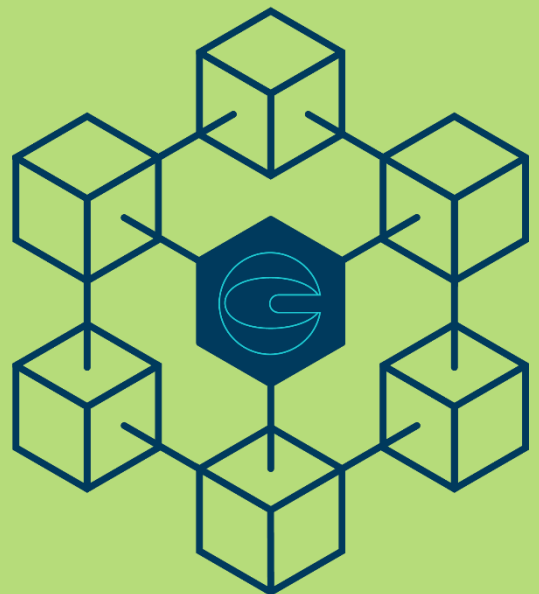
GCC Strategy 2026-2030:

# Equality Impact Assessment

and Welsh Language Impact Assessment

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## **GCC Strategy 2026-2030 Equality and Welsh Language Impact Assessment**

### **Step 1 – Scoping the Assessment**

The term *policy* is interpreted broadly in equality legislation and refers to anything that describes what we do and how we expect to do it. It can range from published policies and procedures to the everyday customs and practices – sometimes unwritten – that contribute to the way our policies are implemented and how our services are delivered.

<b>Title of policy or activity</b>	
GCC Strategy 2026-2030	
<b>Is a new or existing policy/activity?</b>	
This is a new strategy to replace the previous strategy (2022-2024). This assessment has been updated following a public consultation in July and August 2025.	
<b>What is the main purpose and what are the intended outcomes of the policy/activity?</b>	
<ul style="list-style-type: none"> <li>• Set the strategic direction and aims for the General Chiropractic Council to 2030.</li> <li>• Identify specific objectives that will deliver those aims.</li> <li>• Direct the priorities for each year's business plan to 2030.</li> <li>• Identify key factors supporting organisational effectiveness to support the delivery of the objectives and aims.</li> <li>• Highlight changes and developments to these key factors.</li> </ul>	
<b>Who is most likely to benefit or be affected by the policy/activity</b>	
The strategy will impact all aspects of how the GCC carries out our work, and therefore will affect all GCC stakeholders. As a strategic approach it is unrealistic to identify the specific impacts of all possible changes. Any substantive changes to policy or process will be subject to a further Equality and Welsh language Impact Assessment.	
<b>Who is doing the assessment?</b>	
Andrew Fielding, Policy and Insight Officer	
<b>Dates of the Assessment</b>	
<ul style="list-style-type: none"> <li>• When did it start?</li> </ul>	May 2025
<ul style="list-style-type: none"> <li>• When was it completed?</li> </ul>	September 2025
<ul style="list-style-type: none"> <li>• When should the next review of the policy/activity take place?</li> </ul>	When the strategy is next reviewed

## Useful Information

### What information would be useful to assess the impact of the policy/activity on equality?

In developing the strategy, we have been led by concerns regularly raised with the GCC around the fairness, proportionality, accessibility and equity of our work. These have been evidenced in the Pulse Survey, in other research and surveys, in feedback from our stakeholders and partners, and in external assessments of our performance.

Core to the strategy is a bold approach to balance the needs of modern regulation against the expectations of our legislation. The intention is to actively push the boundaries of our legislation where we perceive that it negatively impacts on equality and accessibility.

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

We have considered the diversity of the GCC register, and the diversity of the current cohorts of students studying at accredited UK institutions to qualify as chiropractors.

We have also considered the attitudes to equality, diversity and inclusion within the current register using data from the 2023 Attitudes to EDI survey, and the 2023-2024 reflective CPD requirements.

We have considered the patient views through the 2023 Attitudes to EDI (patients) survey, and the findings of the five Patients Perspective research reports.

### Where can we get this information and who can help?

The public consultation on the strategy explored whether this impact assessment accurately describes how the strategy could impact (positively or negatively) individuals or groups with one or more of the protected characteristics.

During the consultation we also spoke with the EDI working group to gain further insight into the impact of the strategy.

<sup>1</sup> 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. Section 14 of the act also identifies overlapping protected characteristics as protected. The Equality Act 2010 only applies to England, Wales and Scotland.

The same characteristics are protected by similar legislation in Northern Ireland (Section 75 of the Northern Ireland Act 1998), the Isle of Man (The Equality Act (2017)) and Gibraltar (The Equality Act (2006)). The Northern Ireland legislation additionally identifies Political Opinion and having (or not having) children as protected characteristics.

## Step 2 – Evidence and Engagement

**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.**

We have privately discussed the ideas within the strategy with the Royal College of Chiropractors, education providers and other healthcare regulators.

During the consultation process we sought more structured engagement with all our stakeholders, and the finding of the consultation are available as a separate report.

**If you have identified gaps in the data that you need to inform your policy or activity development, how will these data gaps be addressed?**

We identify that we require further information from patients and the public around the impact of our strategy, and will specifically look to fill these data gaps during the implementation of the strategy.

## Step 3 – Data collection and evidence

**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.

In developing the strategy we have identified best practice and research from academics and other regulators into developing fair and equitable regulation.

We have looked at the “High Impact Regulatory Decisions” model being implemented by the General Medical Council. This model looks for the risks of bias (even when no bias can be identified) within decision making, and applies mitigation (and measurement of the mitigation) to reduce that risk of bias. We are keen to apply a similar model within the GCC and believe that this could make our processes more transparent as well as more equitable.

**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?**

As identified above, each substantive change as we deliver the strategy will require a new (and specific) impact assessment.

We consider that the new strategy could raise “regulatory uncertainty” in how we approach and deliver our functions, and that uncertainty may disproportionately affect individuals with protected characteristics. We will seek evidence on this potential impact, and how it can be mitigated.

#### Step 4 – assessing impact and strengthening the policy

What is the likely impact of the policy on individuals with specific protected characteristics? How has it been strengthened in response?

The strategic approach will allow us to reconsider statutory rules that are identified as impacting specific groups disproportionately, where we have previously been constrained by our legislation.

We have not yet considered the scope of what this could include, and would seek further input from the profession and patients before considering any rules.

Any substantive changes would also be subject to a specific Equality and Welsh Language impact assessment.

#### Step 5 – Analysis of impact on Welsh Language and opportunities to use Welsh

##### Welsh Language speakers – understanding the impact

In line with the GCC's duties under standard 42 of [Welsh Language Standards](#) consider the effect that the policy would have on opportunities for persons to use the Welsh language and to treat the Welsh language no less favourably than the English language.

The new strategy is likely to require reconsideration of many aspects of GCC policy and process which have not yet been reviewed, and are therefore not yet published in the Welsh Language.

The detailed impact of any substantive changes would be subject to a specific Equality and Welsh Language impact assessment.

There were no material comments on the impacts of the strategy on our Welsh language duties emerging from the consultation.

##### Welsh Language speakers – creating positive impacts

In line with the GCC's duties under standard 43 of the [Welsh Language Standards](#) consider how the policy could be formulated so that the decision would have positive impacts on opportunities for persons to use the Welsh language and to treat the Welsh language no less favourably than the English language.

The opportunity to create positive impacts through the introduction of any substantive changes to policy or process would be subject to a specific Equality and Welsh Language impact assessment.

##### Welsh Language speakers – decreased adverse impacts

In line with the GCC's duties under standard 44 of the [Welsh Language Standards](#) consider how the policy could be formulated so that the decision would have decreased adverse impacts on opportunities for persons to use the Welsh language and to treat the Welsh language no less favourably than the English language.

The opportunity to decrease adverse impacts through the introduction of any substantive changes to policy or process would be subject to a specific Equality and Welsh Language impact assessment.

## Step 6 – Other identified groups

### Socio-economic group and income

The consultation identified a need for greater focus on inequality caused by economic factors (patients, and new graduates).

### Four countries diversity

How does the policy interact with the legal and cultural frameworks of the countries in which the GCC has a legal framework?

We have not identified any interactions with the legal and cultural frameworks of the countries in which we operate that cause any specific impacts.

## Step 6 – Summary of analysis

The consultation highlighted a number of areas where respondents felt there was a need for greater focus or prominence within the strategy:

- Maternity and parental leave (registrant – particularly around fees and non-practising)
- Neurodivergence and disability (both registrant and patient)
- Inequality caused by economic factors (patients, and new graduates).

## Step 7 – Action Plan

### Summary of action plan

In response to the concerns raised in the consultation, the issue of maternity (and other career breaks for childcare reasons) has been specifically identified in the strategy as an area where the inflexibility of our rules affect people unfairly. This will be responded to within projects in the strategy.

We have introduced a new objective to consider the financial burden for new graduate registrants, and those taking a break from practice.

We will enhance our understanding of the public and patient perspective through research, including with people who have lived experience of barriers to accessing care and services. We will also measure and understand how attitudes towards inclusivity within the profession change over time. We will use these insights to shape our policies and decision-making and will share our findings with the profession.

As we develop the policies and processes set out in the strategy, we will seek out and hear diverse perspectives, to benefit from the lived experience of those that face challenges interacting with us and use their insight to challenge bias in ourselves and others.

We intend to do this early in our development process – we want patients, students and registrants (particularly those with protected characteristics, and those who are directly impacted by a policy) to help us define the scope of the change being considered – not just its eventual impact.

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

### **Where/how will this EIA be published and updated?**

The EIA has been updated and reviewed following this consultation to reflect the insights received from respondents. We will review the impact of the strategy as it is delivered.

### **Feedback on EIA from consultation responses**

As reported in the consultation report, the majority of respondents had no view on the Equality and Welsh Language Impact Assessment.

Within the comments, a small number questioned the focus on EDI and suggested it was politically or ideologically motivated, however many recognised its importance and made positive suggestions for further areas of focus for the GCC.

General Chiropractic Council

Park House

186 Kennington Park Road

London

SE11 4BT

T: +44 (0) 020 7713 5155

E: [enquiries@gcc-uk.org](mailto:enquiries@gcc-uk.org)

W: [www.gcc-uk.org](http://www.gcc-uk.org)

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