

This monitoring report covers the period 1 July 2023 to 30 June 2024. You can find out more about our [performance review process](#) at the end of our report.

Key findings

- The GCC met our Equality, Diversity and Inclusion (EDI) Standard. It performed well and demonstrated good practice in several ways. Its *Education Standards* have a clear focus on EDI and it has produced helpful guidance on EDI for education providers and registrants. The GCC launched a project to review decisions made by its Professional Conduct Committee to identify and address any possible equality issues, building on an earlier review of cases closed by its Investigating Committee. Although we noted some gaps in the GCC's fitness to practise guidance documents regarding allegations of racism or other discriminatory behaviour, the GCC had identified this gap and has plans to address it. We will monitor the GCC's work in this area.
- The GCC is updating its standards for registrants, *The Code: Standards of conduct, performance and ethic for chiropractors*. It conducted a considerable amount of pre-consultation work throughout the year to review existing evidence and gather stakeholders' views. This work informed the proposals in its public consultation, which launched shortly after our review period. We will monitor the outcome of the consultation.
- The GCC took longer to investigate fitness to practise investigations this year. The GCC reported plausible explanations for the increase in its timeliness; staffing issues had an impact due to the small size of the investigations team, plus the closure of some of its oldest cases. We recognised the challenges faced by the GCC as a small organisation but concluded investigations were taking too long this year. We decided Standard 15 was not met.
- We identified opportunities for improvement within the GCC's interim order process and decision-making guidance. We were particularly concerned that the guidance lacks focus on risk. The GCC was receptive to our feedback and has committed to reviewing its process and updating its documents. Given the risks involved with these types of cases, we expect the GCC to resolve the concerns we have identified promptly. We will monitor any changes the GCC makes.

Standards met 2023/24



General Standards	5 out of 5
Guidance and Standards	2 out of 2
Education and Training	2 out of 2
Registration	4 out of 4
Fitness to Practise	4 out of 5
Total	17 out of 18

GCC standards met 2020-23

2022/23	18
2021/22	17
2020/21	17



3,831

professionals on the register
(as at 30 June 2024)

General Standards

The GCC met all five General Standards this year.

These five Standards cover a range of areas including: providing accurate, accessible information; clarity of purpose; equality, diversity and inclusion; reporting on performance and addressing organisational concerns; and consultation and engagement with stakeholders to manage risk to the public.

This section of our report mainly focuses on Standard 3 because we have used a new approach to assessing the regulators against this Standard. More information is available in our [guidance document](#) and our new [evidence framework](#).

Contacting the GCC

Organisations were generally positive about the GCC's communications. We heard that some people experienced difficulties contacting or getting responses from the GCC. This issue was also reflected in the findings from the GCC's registrant pulse surveys in December 2023 and February 2024.¹

The GCC had staff shortages at various points this year. As a small organisation, this hindered its ability to respond promptly at all times. By the end of the review period, the GCC had filled its vacancies and recruited a new registration administrator. It is also making improvements to its registration system which should help people get the information they need. We will monitor for any evidence that the GCC's actions have been effective at addressing the issues reported.

Our assessment of the GCC's performance against Standard 3

As part of our new approach, we have broken down the Standard into four separate outcomes. For a regulator to meet the Standard, we would need to be assured that the regulator has met all four of the

outcomes. Our assessment of the GCC's performance against each outcome is set out below.

Outcome 1: The regulator has appropriate governance, structures and processes in place to embed EDI across its regulatory activities

The GCC has structures and processes in place to embed EDI in its work:

- it continues to implement its EDI Action Plan 2022-24, which is overseen by an EDI Working Group, with regular oversight by Council
- it has work underway to develop a new Action Plan
- its Strategy 2022-24, which has EDI embedded throughout
- an EDI Policy Statement, which places responsibility for EDI on 'all those who work with the GCC, from employees to committee members and registrants'
- it completes and publishes equality impact assessments when implementing major policy changes
- it holds diversity data for all senior leadership, Council, Committees, decision-makers and fitness to practise panellists.

Outcome 2: In terms of EDI, the regulator ensures that registrants and students are equipped to provide appropriate care to all patients and service users, and have appropriate EDI knowledge and skills

The GCC's standards for registrants and education providers include EDI requirements and are accompanied by a range of guidance.

Good practice

We identified the following good practice under Outcome 2:

- The *Education Standards* for education providers have a clear focus on EDI. Providers must ensure students can apply and

understand the principles of EDI and recognise the impact of discrimination and health inequalities.

- The GCC published *Best practice guidance for education providers on EDI* to support education providers in meeting the *Education Standards*, and further information on EDI in its *Student Clinical Placement Guidance*.
- The EDI toolkit for registrants is designed to raise awareness of best practice and support chiropractors to meet legal requirements.
- The GCC made EDI the topic for the 'directed' element of CPD, publishing monthly EDI case studies in its newsletters to support registrants with their learning.

Outcome 3: In terms of EDI, the regulator makes fair decisions across all regulatory functions

The GCC provides EDI training to all staff, including Council members and fitness to practise panellists, who have annual training on topics like neurodiversity, unconscious bias/prejudice, the decision-making process and dealing with vulnerable witnesses.

The GCC is reviewing its functions and processes to identify and address any possible equality issues. So far it has completed a thematic review of cases closed by the Investigating Committee (IC) and acted on its recommendations to improve the diversity of IC members. It has started a similar thematic review of Professional Conduct Committee decisions and will report on its findings.

Opportunity for improvement

The GCC's fitness to practise guidance documents² contain guidance on how to handle cases about sexual misconduct and dishonesty but do not specifically address allegations of racist or other discriminatory behaviour.

The GCC identified this gap for itself and plans to address it as part of wider work to update its guidance following its review of *The Code* (mentioned under Guidance and Standards). We will monitor any changes the GCC makes.

Outcome 4: The regulator engages with and influences others to advance EDI issues and reduce unfair differential outcomes

The GCC engages with stakeholders about EDI issues through its consultations, its EDI Working Group and its Patient Community. This year, it surveyed registrants and patients about EDI and is using the findings to identify areas for further work and research. The GCC also published learnings from a fitness to practise case to raise awareness of EDI issues.

There were very few gaps in the GCC's performance and we identified several examples of good practice. For such a small regulator, the GCC performed well against this Standard and met all four outcomes.

Consulting and working with stakeholders

We receive mixed feedback about the GCC each year. This year, stakeholders described the GCC as: 'internationally respected'; 'approachable, helpful and professional'; and 'willing to listen to us as an organisation which represents a large proportion of their registrants.' Other stakeholders felt the GCC 'still appears to be only listening to one faction of the profession' and that responses to consultations are not fully considered or reflected in the consultation outcomes.

We saw multiple examples of the GCC engaging with its stakeholders. It:

- obtained patients' perspectives on GCC registration and the duty of candour through research with its Patient Community
- visited education providers to speak to undergraduates and new graduates
- worked with the Deans of approved programmes to address risks arising from students attending CPD events outside their education programme
- published a message from the Royal College of Chiropractors to encourage use of an updated Chiropractic Patient Incident Reporting and Learning System
- continued working with the Society of Radiographers to develop resources to improve registrant compliance with Ionising Radiation (Medical Exposure) Regulations 2017.

We were satisfied that the evidence shows the GCC consults and works with stakeholders to identify and manage risks in respect of its registrants.

Guidance and Standards

The GCC met both Standards for Guidance and Standards this year.

Review of *The Code: Standards of conduct, performance and ethics for chiropractors (2016)*

The GCC reviewed *The Code* this year, conducting a considerable amount of pre-consultation work to review existing evidence and gather stakeholders' views in a variety of ways. Activities included:

- an initial scoping review that looked at a range of evidence, such as research conducted with the GCC's Patient Community, standards developed by other healthcare regulators and data from fitness to practise proceedings

- online and in-person events with stakeholders, including registrants and professional bodies
- questionnaires to stakeholders
- a communications campaign called *The Code Conversation*, which included a blog that received over 450 responses.

The findings from the above work informed the proposals in the GCC's formal public consultation, which launched shortly after the end of the review period. We commend the amount of pre-consultation work carried out by the GCC. We will monitor the outcome of the consultation.

Guidance for registrants

The GCC continues to identify and respond to emerging areas of risk by providing information to help registrants apply its standards. It updated its guidance on the *Duty of Candour* in September 2023 and published an accompanying *Candour Toolkit* in March 2024.

Education and Training

The GCC met both Standards for Education and Training this year.

The GCC continued to support education providers with the transition to the Education Standards that were introduced in March 2023. Most providers will begin delivery against the new Standards in September 2024. Providers described the GCC during the transition process as 'supportive,' 'accommodating,' and 'extremely responsive to emails and very efficient when managing [the] annual monitoring process.'

We received and considered a concern about the GCC's process for approving new programmes. We previously found the GCC's quality assurance mechanisms to be risk-based and proportionate. We did not identify any evidence this year to contradict this. The evidence we reviewed, which included a report and recommendation published in

the GCC's public Council papers, suggests the GCC properly applies its processes.

Registration

The GCC met all four Standards for Registration this year.

Accuracy of the Register

We found a serious error in the GCC's Register; a chiropractor who had been erased was still showing as practising. The Register was inaccurate for approximately seven weeks, during which time there was a risk to the public.

Prompted by our enquiries into the issue, the GCC promptly corrected the Register and established the inaccuracy was caused by human error. The GCC introduced new guidance and checks to prevent further errors. It is also exploring if it can add further controls through enhancements to its registration system.

We check the Register entries for all of the GCC's final hearings and this is the only inaccuracy we have seen in the GCC's Register in recent years. This gave us some reassurance that the incident was likely to be isolated. We were also reassured by the GCC's response, which was not complacent about human error. It took corrective action and put reasonable and proportionate controls in place which should prevent a recurrence. We decided the error was not serious enough in and of itself to mean that Standard 10 was not met. We will monitor the effectiveness of the new measures put in place by the GCC.

Continuing Professional Development (CPD)

Several stakeholders were unhappy that the GCC had changed the CPD submission date for 2024 from 30 September to 31 August without consultation. The GCC told us the CPD year has always run from 1 September to 31 August, although it allows a grace period for submissions in certain circumstances. The GCC issued

communications about CPD throughout this year, including a blog in October 2023 asking registrants to submit their CPD by 31 August 2024. Its communications are intended to reverse a trend of increasing numbers of registrants sending last-minute or late submissions. The blog gave registrants more than 10 months to prepare for the August deadline. We suggested the GCC review its published information and communications because we saw some inconsistencies in the dates. The GCC has updated its CPD webpage accordingly. This issue did not impact the proportionality of the GCC's CPD requirements, which remain unchanged.

Fitness to Practise

The GCC met four of five Standards for Fitness to Practise. The GCC met Standards 14, 16, 17 and 18. It did not meet Standard 15.

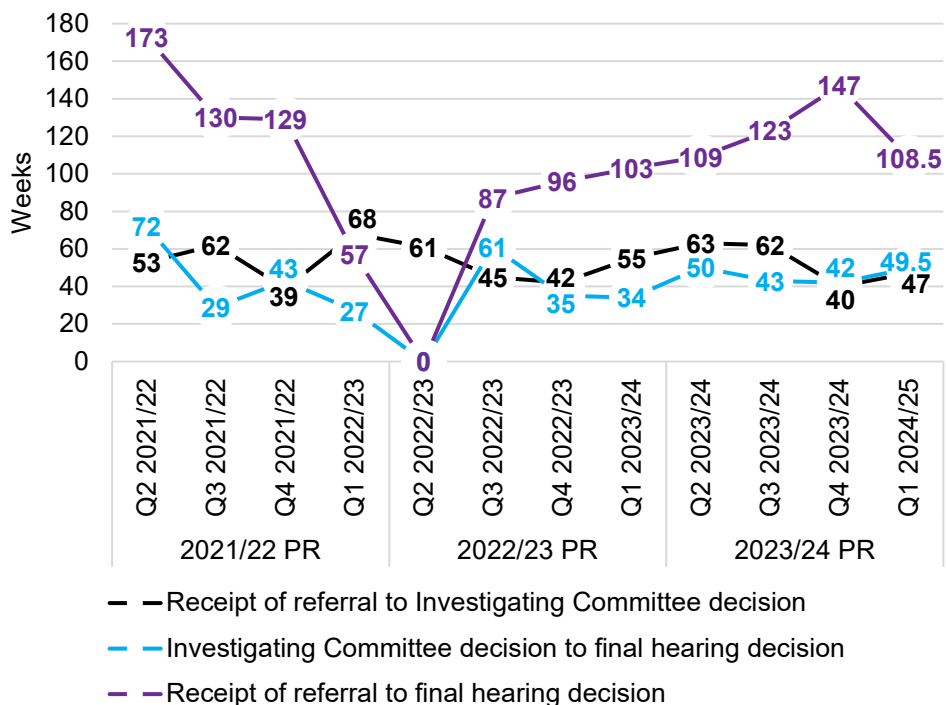
Introduction of Clinical Advisers

The GCC introduced Clinical Advisers to its fitness to practise process this year. They will provide reports to its Investigating Committee on cases where a clinical opinion is deemed necessary. They are intended to improve timeliness and reduce costs by freeing up expert witnesses for more serious, complex cases. It is too early to see their impact, but the GCC is monitoring this closely. We will also continue to monitor updates and any feedback from those involved with these cases.

Time taken to progress fitness to practise investigations

Figure 1 shows that the GCC took longer to investigate cases this year. Figure 2 shows that the number of cases open for more than 52 weeks initially decreased but by the end of the review period was at the highest level reported in recent years.

Fig. 1 Median time to progress fitness to practise investigations

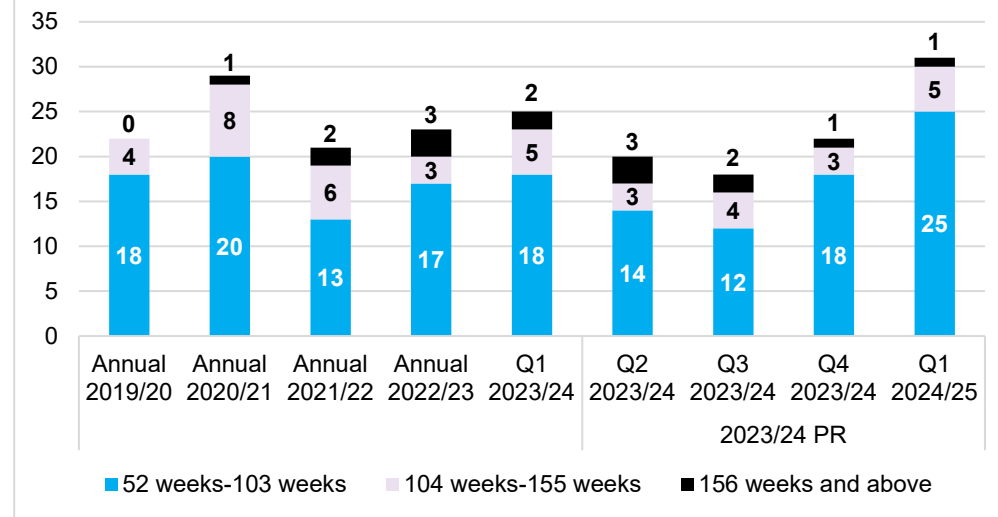


Throughout the year, the GCC reported that its data on timeliness reflected the impact of staff vacancies, sickness and the closing of older cases. It put several mitigating measures in place, including using temporary resources, seconding an experienced solicitor for a fixed period of time and listing additional days for the Investigating Committee to consider cases. By the end of the review period, the GCC had filled all its vacant posts but this will not immediately be reflected in the data, as new starters take time to build knowledge and experience.

We recognise the challenges faced by the GCC; a relatively small number of vacancies can have a big impact in smaller organisations. We welcome the GCC’s recognition of the issues and the actions it

took to try to reduce the impact. It is important to have measures in place to mitigate the impact of staff shortages. While we understand the reasons for the deterioration in timeliness, we concluded that investigations were taking too long this year so the GCC did not meet Standard 15.

Fig. 2 Number of cases over 52 weeks old



Interim orders

The GCC applies for very few interim orders each year. In previous years, we have looked more closely at how the GCC identifies and manages risks and identified no concerns.

This year, we asked the GCC about one case that took 85 weeks to progress from receipt of the referral to an interim order decision. Although we recognise that a large share of the delay was caused by the registrant or their representative, we identified opportunities for improvement within the GCC’s process and decision-making guidance. We were particularly concerned that the guidance lacks focus on risk and risk may not have been considered sufficiently in this case. The GCC acknowledged the investigation could have been dealt

with more proactively and has committed to reviewing its guidance documents as part of current work to develop a new *aide memoire* for the Investigating Committee.

The overall evidence from this and previous years provided some reassurance that this case was isolated. We welcomed the GCC's response and commitment to reviewing its process and updating its documents. On balance, we decided Standard 17 was met. Given the risks involved in these types of cases, we expect the GCC to resolve the concerns we have identified promptly. We will monitor any changes the GCC makes.

Our performance review process

We have a statutory duty to report annually to Parliament on the performance of the 10 regulators we oversee. We do this by reviewing each regulator's performance against our Standards of Good Regulation and reporting what we find. The judgements we make against each Standard incorporate a range of evidence to form an overall picture of performance. Meeting a Standard means that we are satisfied, from the evidence we have seen, that a regulator is performing well in that area. It does not mean there is no room for improvement. Where we identify areas for improvement, we pay particular attention to them as we continue to monitor the performance of the regulator. Similarly, finding that a regulator has met all of the Standards does not mean perfection. Rather, it signifies good performance in the 18 areas we assess.

¹ As reported in the GCC's [Communications Update to Council in March 2024](#), the rating for the GCC being approachable and easy to contact was 3.51 out of 5. This was the lowest result for the six questions about 'confidence in the GCC'.

Our performance reviews are carried out on a three-year cycle; every three years, we carry out a more intensive 'periodic review' and in the other two years we monitor performance and produce shorter monitoring reports. Find out more about our review process [here](#). We welcome hearing from people and organisations who have experience of the regulators' work. We take this information into account alongside other evidence as we review the performance of each regulator.



Quick links/find out more

- ▶ [Find out more about our performance review process](#)
- ▶ [Read the GCC's 2022/23 performance review](#)
- ▶ [Read our Standards of Good Regulation](#)
- ▶ [Read our new evidence matrix for Standard 3](#)

Professional Standards Authority for Health and Social Care

Telephone: **020 7389 8030**

Email: info@professionalstandards.org.uk

Web: www.professionalstandards.org.uk

© Professional Standards Authority for Health and Social Care
September 2024

² *Fitness to Practise Procedure Manual* (January 2023), *IC decision-making guidance* (January 2023) and *Guidance on sanctions* (April 2018).