
Equality, diversity and inclusion action plan

Executive Summary

Introduction

The Equality, diversity and inclusion (EDI) action plan sets out the practical steps necessary to implement the objectives of our Equality, diversity and inclusion (EDI) policy. Our EDI objectives span the core functions identified in our corporate plan 2018 – 2020.

The action plan provides detail in relation to the areas for operational improvement we focus on throughout the year, how they will be measured and who will be responsible for delivering them.

It is not designed as an exhaustive list or record of all EDI activities and projects that we will undertake in a given year. Business as usual functions are not covered in the action plan, for example.

2018 – 2019 EDI action plan

This paper summarises the organisation's progress with this year's action plan, and identifies any particular areas of good practice or where there are areas for improvement.

Appendix A provides specific detail, in full, against each action.

2019 – 2020 EDI action plan

The EDI action plan is due to be renewed for the upcoming year. This will introduce new actions for the 2019 - 2020 action plan period, as well as include ongoing areas of work retained from the last action plan.

The new action plan will also remove some of the actions from the 2018 – 2019 action plan which have been achieved or no longer require monitoring. This is because, whilst the action plan is a public-facing document, it is also an operational document. The actions should therefore reflect only the areas in which there is outstanding work.

For the 2019 – 2020 action plan we are proposing an amendment to the format of the action plan to more closely reflect the objectives of the EDI policy. In the new action plan, actions will appear beneath the relevant objectives from the EDI policy. We hope that this will improve clarity and enable efficient monitoring and reporting.

The proposed new action plan is annexed at Appendix B.

Previous consideration	<p>The papers and 2019-2020 action plan were considered and approved by SMT on 12.11.19.</p> <p>SMT recommended we include an action in the 2019 – 2020 action plan to conduct a scoping exercise for an EDI employee group, to help inform future action plans.</p>
Decision	<p>The Council is asked to discuss:</p> <ul style="list-style-type: none"> • the organisation’s progress to date with the 2018 – 2019 EDI action plan; and • the proposed approach to next year’s 2019 – 2020 action plan.
Next steps	<p>The new 2019 – 2020 action plan will be published on the EDI pages of the website.</p>
Strategic priority	<p>The EDI action plan engages all four strategic priorities.</p>
Risk	<p>Strategic risk 5 - Failure of leadership, governance or culture</p>
Financial and resource implications	<p>The resource implications associated with the application and review of the action plan have been taken into account in work plans for 2019/20.</p> <p>There are no expected financial implications arising from this work.</p>
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Equality, diversity and inclusion (EDI) action plan monitoring

1. Introduction

- 1.1 This paper provides a brief overview of our progress in each area of the 2018 - 2019 action plan. The action plan is included in full at Appendix A.
- 1.2 This will be the first time that the action plan will be reviewed and renewed since it was first introduced in January 2019. For this reason, some actions are still ongoing due to their developmental nature.
- 1.3 Departments are encouraged to wholly embed our EDI objectives into their work throughout the year, and therefore undertake further EDI activities and projects than those set out in the plan where possible. Some examples of further or additional work have also been identified in this paper for reference and transparency.

Performance

- 2.1 During the 2018 – 2019 action plan period, we continued to engage with stakeholders, the PSA and colleagues (through continued attendance and participation at the Joint Health Regulators EDI Forum and the Inter-regulatory LGBT+ Group) about current EDI issues and principles. This included the sharing of best practice and discussion of, and preparation for, the new PSA standard on equality, diversity and inclusion.¹
- 2.2 EDI issues and principles were routinely considered in relation to our research, training, policies and processes. This was particularly productive in relation to the recruitment of employers, partners and Council members, an area in which many of our policies and processes have been reviewed and updated to meet our EDI objectives. In particular, changes made to the Council remuneration policies have already had a positive impact on the number of recruitment applications received. It is hoped that this will improve the accessibility of Council membership.

¹ Standard 3 of the PSA's Standards of Good Regulation (revised) 2019 states: 'The regulator understands the diversity of its registrants and their patients and service users and of others who interact with the regulator and ensures that its processes do not impose inappropriate barriers or otherwise disadvantage people with protected characteristics.'

- 2.3 In September we published the revised Standards for prescribing. These now include the EDI standards which are reflected in the 2017 Standards for education and training.

Communications and engagement

- 2.4 Information is provided in an accessible way using templates drafted in accessible formatting, and by prioritising digital-first delivery of information and engaging stakeholders in an accessible programme of events. We were able to meet our obligations under our Welsh Language Scheme and recently published our Annual Monitoring Report for 2018 – 2019.
- 2.5 We work with other regulators to share good practice and knowledge and we engage stakeholders specifically on EDI issues where possible. This includes addressing EDI in all consultations, surveys and research projects and ensuring that the EDI policy and action plan are visible online.

Effective and efficient organisation

- 2.6 EDI considerations are routinely considered for new pieces of work which may have a differential impact on people with protected characteristics. This is done by way of equality impact assessments (EQIAs) which have been implemented across the organisation following the publication of guidance on when and how to implement them. There is an expectation that Council and Committee papers will include detail of EQIAs for Council's consideration.
- 2.7 The use of standard templates has improved the consistency of EQIAs but we will continue to monitor their use to ensure that they become standard practice for appropriate pieces of work.
- 2.8 The Fitness to Practise department provides information in accessible formats on support and accessibility for witnesses, complainants and registrants involved in the fitness to practise process. A manual has been developed for current and new employees to enable employees to support those engaged in the process.
- 2.9 Guidance and training on reasonable adjustments has been provided. Training on EDI itself has been varied during the action plan period. EDI learning has been implemented successfully for Registration assessors, and employees can currently access an optional e-learning module. Compulsory training for employees was last implemented in December 2018. An EDI e-learning module has been developed and will be available for partners in early 2020. Council members have not yet received training, but it is likely that this will take place in the coming year.

- 2.10 In addition to their actions on the action plan, the Human Resources department has also implemented unconscious bias training for 12 line managers. This training enabled managers to identify different types of unconscious bias and to understand what impact this may have on process and decision making. It is especially important in the areas of recruitment, selection and performance management but is also relevant in wider departmental decision making.
- 2.11 The non-binary title Mx was this year implemented into NetRegulate, the system used by the Registration department. Guidance for employees on supporting the needs of trans and non-binary registrants is in development.
- 2.12 EDI has not been a consistent focus of the Employee Forum (formerly the Employee Consultation Group) during the action plan period, however EDI has recently been included on its agenda as a standing item and so it is anticipated that it will be discussed in forthcoming meetings. Going beyond the action plan, the Employee Forum and Corporate Social Responsibility (CSR) have implemented mental health first aid training to enable a group of 16 colleagues from across the organisation to become 'Wellbeing Advisors'. Their role will include supporting colleagues who may need support with their mental health and wellbeing.
- 2.13 Updates about reasonable adjustments and EQIA guidance were circulated internally. There was some internal communications relating to EDI events throughout the action plan period, but this was circulated on an informal basis.

Data, intelligence and research

- 2.14 Recent changes to NetRegulate will enable Registration to begin collecting EDI data which will enable us to better understand the profile of our registrants.
- 2.15 Some EDI information relating to current and recent employees and partners, as well as applicants, has been collected by CoreHR, exit interviews and during recruitment. The Human Resources department are developing plans to improve their ability to record EDI data in relation to staff retention.
- 2.16 A case classification system was implemented earlier in the year to enable us to collect data about allegations in fitness to practise cases. This is now in use and it is hoped that we will be able to analyse the first year's worth of data in the next action plan period.
- 2.17 Our ability to collect EDI data has been in development throughout this action plan period. We will therefore be more able to analyse the data in the upcoming year.

Appendix A: Equality, diversity and inclusion (EDI) action plan 2018 – 2019

1. Performance

1.1. We will keep informed of current EDI issues and principles through:

- ongoing internal and commissioned research;
- engagement with stakeholders;
- our participation in the joint regulators' EDI forum;
- working with the Professional Standards Authority (PSA) where appropriate; and
- legal advice.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Policy and Standards	EDI considerations present in all research outputs	100% of research outputs to cover EDI issues.	1, 2, 12	<p>100% of the research outputs this year will have covered EDI issues.</p> <p>EDI considerations are present in research on:</p> <ul style="list-style-type: none"> • Health and wellbeing; • FTP case characteristics; and • Supervision. <p>Our Return to practice event explored EDI in more detail.</p>

	Appropriate engagement with the PSA to meet any new standards set with respect to EDI	Record of appropriate communications and reports to the PSA.	1, 7	<p>We have met with the PSA to consider the development of their new standards (including those which relate to EDI) and have provided comments on the draft standards.</p> <p>In September we met with the PSA to talk through our evidence submission under the new Standards of Good Regulation.</p>
	Legal advice sought if changes are made to EDI legislation that may impact our systems and processes.	Record of: <ul style="list-style-type: none"> • legal advice received about changes in EDI legislation that may impact our systems and processes; and • any action taken as a consequence. 	1, 2	There has not been any EDI legislation in the action plan period.
See actions 2.4 – 2.5				

1.2. We will make sure that all of our employee and partner policies are underpinned by EDI principles and support the achievement of our EDI objectives.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Director of HR & OD	Consideration given to EDI principles in the development and generation of all	100% of new and updated employee and partner policies to take account of EDI principles.	1, 3, 10	<p>EDI considerations are automatically considered for all policies.</p> <p>The Equal Opportunities Diversity form for Registration is currently being</p>

	employee and partner policies.			<p>considered by Policy and Standards to ensure alignment with our approach to equality monitoring across all stakeholder groups.</p> <p>The Reasonable Adjustments guidance was recently re-developed with EDI considerations in mind.</p>
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1.3. We will endeavour to improve the diversity of applicants and appointees to all HCPC roles.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Director of HR & OD	Review and develop the language used in our recruitment materials to ensure that management and senior roles are attractive to women	Increased proportion of women in management and senior roles	3	<p>The recruitment materials for partners have been reviewed and the language amended to ensure that management and senior roles are attractive to women.</p> <p>The language of the recruitment materials used by HR has also been amended, and the benefits section enhanced to include flexible working. This has attracted a more female response.</p>
	Maintain and promote our status as a Disability Confident Employer.	Disability confident status is maintained	3	Advertisements for non-registrant partner roles (lay or legal) are always posted on disabilities websites. All advertisements include statements on EDI.

				<p>HR use the website 'Vercida' (which helps employers to promote a positive and diverse working environment) to advertise their roles, in order to improve the diversity of candidates.</p> <p>HR will consider the remainder of the Disability Confident Employer criteria, taking any remedial action if necessary.</p>
Head of Governance	Review Council remuneration policies to improve accessibility of Council membership.	Record of Council remuneration review.	3	<p>This review has been completed. QCG were commissioned to produce a report which was considered by Council.</p> <p>Since 1st April 2019 the Council are paid on a year's annual fee (rather than on a daily rate). This has had a positive impact on the number of recruitment applications received.</p>

1.4. We will review our Standards for prescribing to ensure the standards and guidance that we set for education providers reflect our position on EDI.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Policy and Standards	Revise the Standards for prescribing to include the EDI standards developed in the 2017 standards for	Revised Standards for prescribing consulted published in 2019 (following consultation in 2018).	5	The revised Standards were published in September.

	education and training (the SETs).			
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2. Communications and engagement

2.1. We will make sure that all information we provide, both electronic and hard copy, is available in accessible formats.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Communications	Support all reasonable requests for information to be provided in accessible formats.	100% of requests for information to be provided in accessible format assessed, and reasonable requests supported.	1, 6	All communications use templates drafted in accessible formatting. Communications receive very few requests for information but support 100% of reasonable requests.

2.2. We will promote our standards, guidance and supporting materials in a clear and accessible way online and at events.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Communications	Promote our Standards for conduct, performance and ethics (SCPEs) and Standards for education and training (SETs) at relevant events, including their EDI requirements.		4	The Registrant events programme engages registrants in relation to the standards. There will also be a series of five 'My Standards' events upcoming, for which EDI considerations will be relevant.

Head of Policy and Standards	Improve quality and clarity of EDI resources on the HCPC website.	<ul style="list-style-type: none"> • EDI content on the new HCPC website is periodically reviewed, maintained and developed where appropriate. • EDI policy and action plan are made publicly available online. 	6, 10	<p>The EDI policy and action plan are available online.</p> <p>EDI content is periodically reviewed.</p>
	Prioritise digital-first delivery of standards, guidance and registrant information on the website	<ul style="list-style-type: none"> • Online evidence of digital-first standards, guidance and registrant information delivery 	6	<p>The 'Meeting our Standards' pages provide information and guidance on the standards.</p> <p>Further digital materials are in development.</p>

2.3. We will make sure our events are accessible and invite four countries engagement.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Communications	Accessibility considered for events.	Accessibility considered for 100% of events organised by the Events team.	1, 6, 8	Accessibility is considered in relation to all events.
	Four countries invitees and, where applicable, venues considered for events.	Four countries consideration for 100% of events organised by the Events team.	1, 6, 8	The events programme covers all four nations. They are also geographically dispersed across the north and south of England.

2.4. We will make sure that our consultations, surveys and research projects address relevant EDI issues and engage a diverse range of stakeholders.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Policy and Standards	EDI question asked and evaluated in consultations, surveys and research projects.	100% of consultations, surveys and research projects to cover EDI.	1, 2, 6	EDI questions are asked for all consultations, surveys and research projects. This was most recently done in relation to the fees consultation.
	Consideration of any special measures required to reach relevant equality groups in consultations, surveys and research projects.	Record in equality impact assessments (EQIAs) for relevant projects that stakeholder mapping and targeted communications have been considered.	1, 6	<p>We have not undertaken any consultations since EQIAs were introduced. Patient representative groups and the Equality and Human Rights Commission will be contacted for the SOPs consultation next year.</p> <p>We consider EDI considerations in invitation to tender documents when appointing research teams.</p> <p>We held meetings in different formats, including face to face meetings across all four nations, for significant projects such as the Standards of Proficiency (SOPs) review to reach relevant equality groups.</p>

2.5. We will work with others to make sure we follow the current principles of EDI.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Policy and Standards	Regular attendance at the Joint Health Regulators EDI forum.	Record of attendance at the Joint Health Regulators EDI forum.	2, 7	We attend these events regularly.
	Regular attendance at the inter-regulatory LGBT group.	Record of attendance at the inter-regulatory LGBT group.	2, 7	We attend these events regularly.

2.6. We will meet our duties under the Welsh Language Act.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Policy and Standards	Satisfactory performance as monitored by the annual report to the Welsh Government.		1, 8	Performance was satisfactory last year. We have continued to comply with the requirements of our Welsh Language Scheme and recently published our Annual Monitoring Report for 2018-19. The report sets out the steps we have taken to implement the scheme.

3. Effective and efficient organisation

3.1. We will implement processes to ensure that consideration is routinely given to EDI matters at a Council level.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Policy and Standards and Head of Governance	Review of structure and content requirements for Council and Committee submissions to support visibility of EDI issues	EDI considerations routinely included in Council and Committee submissions	2, 9	<p>This review has been completed.</p> <p>It was decided that EDI should not be a header in SMT, ETC and Council cover sheets, however EDI issues should be considered across the organisation for bigger projects. This is achieved by way of an Equality Impact Assessment (EQIA).</p> <p>We published guidance in March 2019 and an intranet article in April 2019 on when and how to complete EQIAs.</p>

3.2. We will review our equality impact assessment (EQIA) practices in a targeted manner within the organisation.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Policy and Standards	Project to review and improve quality and consistency of EQIAs across key departments.	Record of project outputs including updated and agreed EQIA processes across key departments.	2, 6, 10	We have introduced standard templates for EQIAs and guidance. This serves to improve the consistency and quality of EQIAs.
	Training in equality impact analysis to be considered for relevant staff.	Record of research into and business case developed for equality impact analysis training.	11	<p>We have published guidance on EQIAs across the organisation.</p> <p>Training has been considered and we are considering the development of a business case.</p>

	Develop a policy and targets for the completion of EQIAs	Policy agreed and published internally	1, 10	This approach was reviewed and considered inappropriate.

3.3. We will make sure that all those engaged in the fitness to practise process are effectively supported.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Fitness to Practise	Guidance and support materials provided for witnesses, complainants and registrants.	Record of routes through which witnesses, complainants and registrants can access guidance and support materials.	6, 10	<p>A step by step process has been provided for complainants on how to raise a concern. This is available on the website and also links to other guidance including 'How to raise a concern' (which is available in multiple languages) and 'What if a concern is raised about me?'. These documents were revised in January 2019 (following the new Threshold Policy) and will likely be reviewed and amended in December 2019. These documents are also available in Welsh.</p> <p>The HCPTS website also provides guidance and support materials for witnesses, registrants and complainants. These reference EDI and include a virtual tour of the site and accessibility information.</p>

	Guidance and support materials provided for employees in how to support witnesses, complainants and registrants.	Record of guidance materials available to staff in how to support witnesses, complainants and registrants.	6, 10	<p>FTP will shortly be launching a manual to include information on the FTP process; employee wellbeing; supporting and managing suicidal contacts and reasonable adjustments.</p> <p>This will be provided to case management teams and line managers, and will form part of the induction programme for new employees. It will be reviewed regularly to ensure that the information is consistent and up to date.</p>
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3.4. We will provide guidance to employees on making reasonable adjustments for customers and stakeholders, and provide regular training on this area.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Policy and Standards	Guidance provided to employees, and regular training delivered.	<ul style="list-style-type: none"> Reasonable adjustments learning provided every 2 years with at least 75% participation. 100% participation for new employees. 	1, 6, 11	<p>Reasonable adjustments training was last provided in early 2018. It is due to be provided next in 2020.</p> <p>Guidance was circulated internally and is available on the intranet. We also support colleagues with concerns or questions they might have about the guidance.</p>

3.5. We will update our processes and produce guidance for employees in our Registration department to support applicants and registrants identifying as trans or non-binary.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Registration	Implementation of the non-binary salutation Mx into registration systems and procedures.		6	Use of the Mx title is now available in the live NetReg system.
	Guidance provided to employees on supporting the registration needs of trans individuals.	Guidance completed and distributed by end of June 2019.	1, 6, 11	This guidance is in development and will follow completion of the MX salutation work.

3.6. We will engage employees regarding our EDI policies and practices through the Employee Consultation Group (ECG).

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Director of HR & OD	EDI to be included in forthcoming ECG agendas and discussions	Record of EDI on the agenda and minutes for meetings of the ECG	10	EDI has not been included in Employee Forum agendas so far but will be included in the next agenda, from which point it will be a standing agenda item. There will also be reporting on and discussion of the EDI impacts of any big changes within the organisation.

3.7. We will make sure that all employees, partners and Council and Committee members participate in regular EDI training.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Governance	Training for Council members on reviewing and analysing EDI impact assessments	Record of training date(s) and session outline.	1, 2, 9	<p>Council members have not yet undergone training, however it was agreed following a paper to Council in July that Council will look to use an online training portal.</p> <p>Governance will discuss putting a module together with HR and it is anticipated that this will happen in Autumn/Winter 2019.</p>
	Review regular EDI training strategy for Council members	Record of discussion of training needs, interests and planning for 2019/20.	1, 2, 9	<p>Council members have not yet undergone training, however it was agreed following a paper to Council in July that Council will look to use an online training portal.</p>
L&D manager	Regular EDI sessions and/or e-learning courses provided to employees.	<ul style="list-style-type: none"> • EDI learning provided every 2 years with at least 75% participation. • 100% participation for new employees 	11	<p>There has recently been training on unconscious bias.</p> <p>An EDI e-learning module was uploaded to the Learning Hub in February 2018. This module is optional for employees.</p> <p>Compulsory interactive workshops are held for employees every 6 months. The last of these was held in December 2018.</p>

Partner and HR Manager	Regular EDI sessions and/or e-learning courses provided to partners.	<ul style="list-style-type: none"> • EDI learning provided every 2 years with at least 75% participation. • 100% participation for new employees. 	11	<p>EDI learning has been implemented for Registration assessors (which amounts to 200+ partners). Participation in this learning has been rigorous and amounts to 98%.</p> <p>All partners have recently been added to the learning hub. The EDI e-learning module will be rolled out in early 2020 (once the current information security training has been completed).</p>
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3.8. We will develop a schedule of internal communications to celebrate EDI events and circulate important updates relevant to our EDI policy and action plan.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Policy and Standards	<p>To ensure intranet updates are circulated:</p> <ul style="list-style-type: none"> • When reports are issued on progress against the EDI action plan; • When changes are made to the EDI policy or action plan; • Quarterly in respect of EDI events and celebrations. 	Record of intranet communications in these circumstances.	10, 11	<p>Internet articles will be circulated following Council in December.</p> <p>CSR produce intranet articles in relation to EDI events and celebrations.</p>

4. Data, intelligence and research

4.1. We will endeavour to appropriately collect and record equality and diversity data in order to understand the profile of our registrants. We will continue to review the legislative and system constraints that challenge our ability to achieve this.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Policy and Standards and Head of Registration	Process for collecting equality and diversity data from registrants reviewed for efficacy and optimised where possible.	Evidence of process review and record of a business case for relevant changes to our Registration system.	1, 12	This process has recently been implemented as part of a NetReg changes portfolio. The updates include a link to a survey to collect EDI data.
	Target response rate developed for registrant equality and diversity data.	Target response rate agreed for registrant equality and diversity data and reporting completed against this target.	12	This is in development with system providers. Data collection has not yet begun.

4.2. We will endeavour to appropriately collect and record equality and diversity data from those we interact with including: respondents to consultations and research surveys; and complainants and others involved in fitness to practise proceedings. We will continue to review the legislative and system constraints that challenge our ability to achieve this.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress

Senior management team	Process for collecting equality and diversity data from those we interact with reviewed for efficacy and optimised where possible.	Evidence of process review and system changes made where relevant.	12	We have focused our attention this year on securing better EDI data collection methods for registrants. However, now we have established both interim and long term collection for this group, we will turn our attention to other stakeholders.
	Target response rates developed for equality and diversity data for different stakeholder groups.	Target response rates agreed for equality and diversity data for different stakeholder groups and reporting completed against these targets.	12	To be determined as we progress the above.

4.3. We will collect and record equality and diversity data on all applicants and employees.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Director of HR & OD	Develop the range and depth of our diversity monitoring data for the recruitment and retention of employees and partners	Development of data for employee and partner recruitment and retention that will identify gaps and inform targeted action	3, 12	<p>EDI data is currently captured on CoreHR. HR are developing plans to capture data in relation to retention.</p> <p>Partner retention data is provided to SMT quarterly. Exit interviews and exit forms are completed during any periods of increased resignations to determine if there are any trends. Feedback is also sought from all applicants to FTP campaigns to identify trends in recruitment.</p>

Director of HR & OD	Target response rates developed for equality and diversity data for applicants and employees.	Target response rates agreed for equality and diversity data for applicants and employees and reporting completed against this target.	3, 12	The portal collects EDI data for applicant partners. A report is completed after all non-registrant recruitment. Target response rates have not yet been developed.
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4.4. We will review how we collect data about allegations in fitness to practice cases, in order to work towards more efficient analysis of cases that involve EDI issues such as discrimination.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Policy and Head of Fitness to Practise	Review current framework for classification of allegations in fitness to practice cases.	Revised framework for classification of allegations and associated guidance to be implemented in 2019.	2, 12	This was implemented into the CMS in February 2019. The first three months of data from this framework was reported to Council in September 2019.

4.5. We will analyse equality and diversity data and make sure that it is used to inform the EDI aspects of our work.

Owner	Action(s)	Measure(s)	EDI Objective(s)	Progress
Head of Policy and Standards	Analysis of equality and diversity data undertaken and presented to Council annually.		1, 2, 9, 12	Data collection has not yet started. We plan to undertake internal data analysis in Q4 2019/20 and will commission independent research in Q1 2020/21.

Appendix B: Equality, diversity and inclusion (EDI) action plan 2019 - 2020

The Equality, diversity and inclusion (EDI) action plan 2019 – 2020 sets out specific, practical steps that the HCPC will take to meet the objectives identified in our EDI policy. These objectives fall within the four core functions identified in our Corporate Plan 2018 – 2020.

The action plan is not an exhaustive list or record of all the EDI activities and projects that we will undertake in a given year. The actions therefore reflect only the areas in which there is outstanding work. Business as usual functions are not covered in the action plan.

In addition, each department is encouraged to wholly embed our EDI objectives into their work throughout the year and will therefore undertake further EDI activities and projects alongside those set out in the action plan.

Performance

1. To adhere to EDI legislation, meet regulatory standards for EDI and make certain that our practice as a regulator is fair, consistent and free from discrimination.

Owner	Action(s)	Measure(s)
Head of Policy and Standards	Appropriate engagement with the PSA to meet the new standard with respect to EDI.	Record of appropriate communications and reports to the PSA.
	Legal advice sought if changes are made to EDI legislation that may impact our systems and processes.	Record of: <ul style="list-style-type: none"> • legal advice received about changes in EDI legislation that may impact our systems and processes; and • any action taken as a consequence.
	Consideration given to EDI principles in the review of our Returning to practice guidance.	Record in equality impact assessments (EQIAs) that EDI considerations have been considered.

	Consideration given to EDI principles in the review of our Guidance on health and character.	Record in equality impact assessments (EQIAs) that EDI considerations have been considered.
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2. To be alert and responsive to EDI issues raised in the course of our work and in the regulatory sector and to manage them with integrity.

Owner	Action(s)	Measure(s)
Head of Policy and Standards	Analysis of equality and diversity data collected and presented to Council annually.	
Head of Policy and Standards	Monitor use, quality and consistency of equality impact assessments.	Record of equality impact assessments completed for relevant pieces of work.
Head of Policy and Standards & Director of HR & OD	Conduct scoping exercise to determine whether there is need for an EDI employee group to generate ideas for development of the action plan.	Record of exercise and any agreed action.

3. To appeal to, employ and maintain a diverse HCPC workforce that is reflective of the public we protect.

Owner	Action(s)	Measure(s)
Director of HR & OD	Analyse diversity monitoring data to identify any trends or gaps in relation to the diversity of the HCPC workforce, and to identify any areas in which work may be necessary.	Record of analysis and any agreed action.
Head of Communications	Create and share images within our communications programme which reflect the diversity of our registrant and employee bodies.	Images, case studies and other communications reflect the diversity of our registrant and employee bodies.

4. To promote robust professional values in our registrants by setting clear expectations around EDI in our standards, guidance and communications.

Owner	Action(s)	Measure(s)
Head of Policy and Standards	Improve quality and clarity of EDI resources on the HCPC website.	Content is available on the HCPC website in relation to: <ul style="list-style-type: none"> • our standards; • professional values; and • the role of EDI in education and training.

5. To set standards for education providers that support fair access to and equality of opportunity within the professions that we regulate.

Owner	Action(s)	Measure(s)
Head of Education	Consideration given to EDI principles in the review of the approach to quality assurance.	Record in equality impact assessments (EQIAs) that EDI considerations have been considered.

Communications and engagement

6. To deliver services, events, consultations, communications and publications that are relevant and accessible to all and that promote diverse engagement with us.

Owner	Action(s)	Measure(s)
Director of HR & OD and Head of Communications	Review and maximise, where possible, our engagement and communication with external representative groups to share learning and promote diverse engagement with us.	Record of communications with external organisations.

7. To work in partnership with other regulators to explore EDI issues and to ensure that our approach to EDI is contemporary, evolving and rooted in best practice.

Owner	Action(s)	Measure(s)
Head of Policy and Standards	Work with other regulators to develop materials which address EDI issues.	Record of EDI content on the website.

8. To be mindful of diversity throughout the four countries, value and respect unique national perspectives and invite UK-wide participation in our work.

Owner	Action(s)	Measure(s)
Head of Policy and Standards Head of Policy and Standards	Consideration of any special measures required to reach relevant equality groups in consultations, surveys and research projects.	Record in equality impact assessments (EQIAs) for relevant projects that stakeholder mapping and targeted communications have been considered.
	Changes to the Standards of proficiency to reflect, value and respect diversity across the four countries.	Record of consideration of EDI issues in relation to unique national perspectives.
	Changes to our Returning to practice guidance to reflect, value and respect diversity across the four countries.	Record of consideration of EDI issues in relation to unique national perspectives.
	Changes to our Guidance on health and character to reflect, value and respect diversity across the four countries.	Record of consideration of EDI issues in relation to unique national perspectives.

Effective and efficient organisation

9. To ensure that all Council and Committee processes account for EDI considerations and the HCPC EDI action plan undergoes annual Council review.

Owner	Action(s)	Measure(s)
Head of Governance	Training for Council members on reviewing, analysing and engaging in EQIAs.	Record of training date(s) and session outline.

10. To ensure that our EDI policies and practice are well embedded, clear and open to feedback from employees and stakeholders.

Owner	Action(s)	Measure(s)
Director of HR & OD	Employees to be offered the opportunity to engage in and support EDI issues.	Record of EDI on the agenda and minutes for meetings of the Employee Forum.
Head of Policy and Standards and Head of Communications	Intranet updates to be circulated quarterly in respect of EDI events and celebrations.	Record of regular intranet communications.

11. To deliver training in EDI to all our staff and partners, tailored where appropriate to their roles, and promote a culture of understanding and inclusivity among staff.

Owner	Action(s)	Measure(s)
Head of Policy and Standards	Training in equality impact analysis to be considered for relevant staff.	Record of research into and business case developed for equality impact analysis training.
Head of Policy and Standards	Reasonable adjustments e-learning to be developed for employees.	Reasonable adjustments e-learning module completed.

Head of Registration	Guidance to be provided to employees on supporting the registration needs of trans individuals.	Guidance completed and distributed by end of June 2020.
Head of Governance	Training to be provided for Council members on reviewing and analysing EDI impact assessments	Record of training date(s) and session outline.
L&D manager	Regular compulsory EDI training to be provided to employees.	Compulsory EDI training provided every 2 years with at least 75% participation across the organisation.
Partner and HR Manager	EDI e-learning to be provided to partners.	100% participation for new partners.

Data, intelligence and research

12. To continue to seek EDI data from those we interact with and be proactive in improving how we collect, analyse and apply EDI data in our corporate decision-making.

Owner	Action(s)	Measure(s)
Head of Policy and Standards and Head of Registration	Commission independent research to explore trends and influence future actions.	Research successfully commissioned and commenced within 2020.
Director of HR & OD	Develop the range and depth of our diversity monitoring data for the retention of employees and partners.	Development of data for employee and partner retention that will identify gaps and inform targeted action.
Director of HR & OD	Target response rates developed for equality and diversity data for applicants and employees.	Target response rates agreed for equality and diversity data for applicants and employees and reporting completed against this target.

Head of Policy and Head of Fitness to Practise	Monitor use and efficacy of case classification framework to enable analysis of cases which involve EDI issues such as discrimination.	Record of data collected and any identified trends.
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