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## Equality, diversity and inclusion (EDI) action plan

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### Executive Summary

We have made good progress in the first half of 2020 against our Equality Diversity and Inclusion (EDI) action plan 2019-2020 (covered in detail in Appendix B), which we can build on during the rest of 2020. Recent events have re-energised the focus on our EDI agenda, which we should maximise on, to drive substantial improvement in our organisational approach to EDI.

Appendix A describes the HCPC's plans for the development of our strategic approach, governance and accountability structures, and resourcing measures, to support the effective strengthening of our approach to EDI work going forward. This will align our approach with our ambition to be in a position where those we work with, and for, are confident that we are a fair, diverse and supportive, regulator and employer of choice.

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Decision	The Council is asked to discuss and provide feedback on: <ul style="list-style-type: none"><li>the organisation's progress to date with the 2019 – 2020 EDI action plan;</li><li>the organisation's plans for strengthening our capability, expertise, feedback and engagement mechanisms, accountability and governance structures for our EDI agenda.</li></ul>
Previous consideration	The EDI action plan 2019-2020 was discussed at the December 2019 Council Meeting.
Next steps	See 'Next Steps' section in Appendix A.
Strategic priority	The strategic priorities set in 2018 are no longer current. We are developing a new strategy that we aim to confirm at the end of 2020.
Risk	Strategic risks 3 & 5: failure to be a trusted regulator and meet stakeholder expectations, failure of leadership, governance or culture.
Financial and resource implications	The resource has been accommodated within the 1 <sup>st</sup> quarterly phasing of the budget.
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## **Council Meeting 28 July 2020**

### **Appendix A: Progress update on equality, diversity and inclusion (EDI) action plan**

#### **Introduction**

The Equality, diversity and inclusion (EDI) action plan<sup>1</sup> 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.

#### *Progress since the last update on the 2019 – 2020 EDI action plan*

Appendix B provides detail against each action, the organisation's progress with this year's action plan and highlights where there are areas for improvement in the second half of the action plan period.

#### **Developing our strategic approach to EDI**

##### *External context and impact for the HCPC*

It is important to assess our progress against our EDI action plan in the context of the current social, economic and political climate. Global racial discrimination and health inequalities have been well documented for decades, but some of the disparities have been starkly brought to the fore in recent events<sup>2</sup>. Now is a more important time than ever to demonstrate that EDI is one of our key focuses as a regulator and employer; ensuring that EDI good practice is embedded throughout all that we do. Employees and our registrants are watching closely, how we as an organisation respond to the events. Indeed, we have seen increases in requests for information about our work in this area internally and externally.

##### *Areas for improvement*

In the last two years, there has been a significant increase in EDI related activity across the organisation. However, there has been a lack of clear lines of leadership, ownership, visibility and accountability for EDI within and across the organisation. The introduction of the EDI action plans and equality impact assessments have been

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<sup>1</sup> 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.

<sup>2</sup> See for example, the Public Health England review of disparities in the risk and outcomes of COVID-19 which shows that there is an association between belonging to some ethnic groups and the likelihood of testing positive and dying with COVID-19. This review found that the highest age standardised diagnosis rates of COVID-19 per 100,000 population were in people of Black ethnic groups (486 in females and 649 in males). [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/892376/COVID\\_stakeholder\\_engagement\\_synthesis\\_beyond\\_the\\_data.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892376/COVID_stakeholder_engagement_synthesis_beyond_the_data.pdf) and in relation to the Black Lives Matter Movement John Barwick published a 'Black Lives Matter' blog <http://www.hcpc-uk.co.uk/news-and-events/blog/2020/black-lives-matter/>

a welcome and promising starting point, however the degree to which EDI is operationalised within and across all areas of the organisation is questionable. There are also generally low levels of awareness of our EDI action plan and ways of working to embed EDI in all that we do.

There is room for improvement, to change the culture of the organisation to approach EDI in a more joined-up, holistic, strategic, forward thinking, efficient and effective way, across all of our stakeholder groups (including employees, partners, registrants and service users). There is also a great opportunity to enhance awareness about our EDI work, both internally and externally.

### **Governance, accountability and oversight**

While it is important to stress that *everyone* in the organisation is responsible for EDI, the Senior Management Team (SMT) are responsible for setting the focus/direction, ensuring that the organisation has a clear and actionable strategy and EDI action plan, aligned to the organisation's purpose. That strategy and accompanying action plan is then executable right down throughout the organisation, with the tone from the top, through a programme of meaningful actions and initiatives. It therefore follows that the appropriate role of Council is to scrutinise the strategy and/or action plan and hold the SMT to account for delivery.

### **Plans for strengthening our approach to EDI**

#### *Employee forum engagement/consultation on EDI*

EDI was included on the Employee Forum (EF) agenda in June 2020 and SMT/HR have consulted with EF representatives on proposals for EDI, which include:

- An EDI Group that could feed into policy development, highlight issues, celebrate issues/actions;
- A Senior Manager to have EDI responsibility, which would be reflected in their job title;
- A group to review Equality Impact Assessments (with training to be provided);
- Reverse mentoring (this is where SMT could 'buddy up' with other colleagues from diverse backgrounds to catch up regularly and find out how people are feeling, and if there are any issues SMT need to be aware of. It could help SMT better understand problems and issues, and allow for an opportunity to discuss potential solutions informally and confidentially);
- Intranet or Teams forum for employees to share educational literature, films etc;
- External speakers to inform and educate;
- A review of what other organisations are doing in relation to EDI, to feed back into the HCPC.

The SMT have reviewed the EF feedback and discussed and agreed several measures/changes to our approach in order to strengthen direction, ownership, accountability and governance in our EDI work. These are summarised in detail below.

### **Development of a 5-year EDI strategy (2021-2026)**

The EDI policy and action plans have served an important purpose in building a strong foundation upon which to build, but an EDI strategy for 5 years (starting in 2021) will support the HCPC's efforts in adopting more of a forward-thinking, strategic and joined up approach to its EDI ambitions. This is an approach that other regulators such as the GMC have taken<sup>3</sup>.

The EDI strategy will align clearly with the corporate strategy currently being developed, and will set out short, medium and long term aims and priorities and will provide a vision for what we want to achieve and how we would like to improve, as a diverse, fair, and modern employer and regulator of choice.

Registrants, service users and employees/partners will be involved in the development of the contents of the strategy (throughout Summer 2020) so that we can develop clear aims and priorities that are informed by their experiences. The annual action plans will sit beneath the strategy with the actions aligned to the aims of the strategy (for each year of the strategy period). Therefore, the action plan for 2021-2022 will be developed alongside the strategy. Please see figure 1 below for an indicative timeline for the strategy development.

*\*Figure 1: Indicative timeline for development of the EDI Strategy 2021-2026*



### **Appointment of SMT member as Champion/Lead/Sponsor/Representative for EDI**

In order to set the right tone/message about EDI being a priority area, a named senior executive team member will be appointed as a sponsor/organisational representative for EDI. This approach is suggested in guidance from the Equality

<sup>3</sup> <https://www.gmc-uk.org/about/how-we-work/equality-and-diversity>

and Human Rights Commission, 'Good equality practice for employers: equality policies, equality training and monitoring'<sup>4</sup>.

The SMT EDI representative will provide leadership on this agenda and use their seniority, gravitas and power to influence and affect change across the organisation. They will be responsible for overseeing the development of the EDI strategy and implementation of the existing EDI action plan process and providing leadership on the issues across the organisation. They will also be responsible for reporting to Council regularly on progress against annual action plans and partnered with the appointed Senior EDI representative from Council.

### ***EDI Steering Group and EDI employee forum/network***

The SMT member appointed as EDI representative for the HCPC will be supported by an internal EDI Steering Group with representatives from each of the regulatory functions/areas of the business (at Head of Section level). The SMT representative will chair the EDI Steering Group and have oversight over the Steering Group's activities. Bi-monthly EDI Steering Group meetings and reporting to the SMT EDI representative will occur (on progress against actions) and bi-annual reporting to Council.

The EDI Steering Group will be responsible for the implementation of the strategy and action plan, and accountable to SMT and Council for delivery against the objectives and actions in their respective areas of the business. The EDI Steering Group meetings will also serve as a forum for members to discuss any issues and to support one another in effective delivery and improvement.

This EDI Steering Group will be in addition to an employee-led EDI internal forum or network (this is the idea that has been consulted on/approved with the employee forum), which could be comprised of staff from all/any levels of the organisation.

The employee EDI forum/network will be a (distinct) key feedback and engagement mechanism, to ensure that we receive and understand the experiences and opinions of staff, thus informing and scrutinising the strategy and action plan; with the EDI Steering Group responsible for the delivery of it.

There will also be additional mechanisms developed to regularly capture feedback from all employees/partners on their experiences and views with regards to our EDI performance as a regulator and employer. Reverse mentoring between SMT members and more junior members of staff may be one way of doing this, as has already been suggested as part of SMT/EF discussions. However, staff who may not feel comfortable or able to participate in such a scheme will be provided the opportunity to give feedback and raise any concerns in other, preferably anonymous, ways (such as anonymised (Pulse) surveys).

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<sup>4</sup> <https://www.equalityhumanrights.com/en/publication-download/good-equality-practice-employers-equality-policies-equality-training-and>

### **Recruitment/appointment of a full time, permanent EDI Policy Lead**

A full time, permanent EDI Policy Lead (at 'manager' level) dedicated solely to EDI with expertise and experience in developing and improving organisational and regulator EDI systems, will be appointed (from September 2020).

The EDI Policy Lead will co-ordinate and provide strategic policy advice for EDI across the organisation (with responsibility for delivering EDI actions remaining with relevant leads across the organisation, for example HR leading on EDI in HR processes).

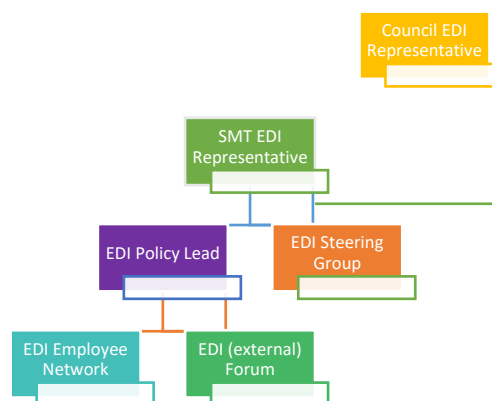
The EDI Policy Lead role will be to guide, advise and support internal teams and individuals to embed EDI as an integral part of all that they do and to hold them and the appointed SMT member to account for doing so. Having an appointed EDI Policy Lead will not preclude the HCPC from bringing in specialist expertise for specific pieces of work or projects as necessary. For example, HR working with a specialist recruitment agency to attract diverse candidates and looking at how to make HCPC an employer of choice, or an expert in EDI training being contracted to develop training/workshop materials and to undertake delivery (if considered necessary).

### **Development of an external EDI forum**

The EDI Policy Lead will also develop mechanisms for regularly engaging externally on EDI (with support from the Communications Team) and ensuring that the EDI strategy, policy and action plans are informed by that engagement. This could include for example, the recruitment for, and development of, a quarterly forum meeting of external EDI representatives (akin to the NMC's BME Forum and the GMC's BME Forum and Strategic EDI Forum). The EDI Policy Lead would also provide secretariat support for the external EDI forum. The SMT EDI representative would be the Chair of this Forum.

Please see figure 2 below for a visual representation of the basic accountability structure.

*\*Figure 2: Visual representation of basic structure*



### **Internal and external communication and engagement about our EDI plans**

All of the measures/changes above will be supported by effective internal and external communications (for example, blogs, all employee meetings, registrant newsletters etc). We will further promote and publicise our EDI action plan and



associated work streams as widely as possible, and there are a number of ways this can be done. Promoting them is key to implementing them effectively and will help us demonstrate that we have taken all reasonable steps to prevent and address discrimination.

### **EDI data and intelligence**

Our ambitions to be a fair and inclusive regulator and employer go beyond complying with the requirements of equality and human rights legislation (including our public sector equality duties). This starts with understanding and evidencing the EDI profile of our registrant, partner and employee populations. Data unlocks the potential to shine a light on the issues with a strong evidence base to back it up.

As a core component of our ambitions to strengthen the way that we plan, communicate and implement our EDI agenda, is that it be informed by strong evidence bases. Overall, the HCPC needs to garner a more holistic and transparent picture of the EDI profile of its registrants, employees, and partners as a whole, in order to identify and take action to address any potential discrimination, harassment, and/or unconscious/conscious bias. We must first gain this (current) picture of the profile of our registrants before we are able to begin analysing the impact of our regulation on our registrants in relation to their EDI characteristics and understanding how the demographics are evolving through time.

In December 2019 we launched our first annual, voluntary survey of our registrants to establish a stronger base of data on registrant EDI information. The responses to the survey mean we hold contemporaneous EDI data for 5% of the Register. We are commissioning an external research team to further assess the data, identify any gaps and provide expertise on analysing the data effectively to meet our aims. We hope to have appointed the research team by the end of July and expect to receive their final report by mid-late September 2020. We plan to use the commissioned analyses to inform a report which the HCPC will draft and publish in late 2020/early 2021.

#### *Targeted Communications Campaign to improve EDI data*

We are concerned a 5% response rate isn't a high enough proportion of the Register to be truly representative and so have, and will in future surveys, ask professional bodies to support us in encouraging registrants to complete the survey. We have also engaged other regulators to establish what other methods might assist us in increasing this figure to a reasonable level. We plan to undertake a targeted campaign with registrants to boost participation in the survey. This survey and campaign comes before the EDI data collection form is integrated into whatever registration system/portal is developed as part of the HCPC's wider review of its registration system.

In the interim, while we develop our data and insight capability to meet our longer term aims, there are some 'quick wins' that can be achieved, such as the work the

Digital Communications Manager is doing to develop the data & insight hub of the website by publishing monthly snapshots of the Register.

### **Next steps**

While we progress with the changes set out above, there are a couple of initiatives devised by employees that we are progressing sooner rather than later. On 16 July we introduced an employee EDI channel (to share recommendations and resources eg books, TV programmes, films, podcasts) and a Celebration Channel (to share religious festivals, national holidays, life celebrations such as births, marriages, scholarly success, and other celebratory events) on Teams.

We are also progressing with the recruitment of the EDI Policy Lead (to start in approximately September 2020) and will engage with employees, registrants and other key stakeholders to pull together some key themes arising from discussions, which can form the starting basis for the EDI strategy. The key themes will then be brought to the September Council meeting for feedback to be sought before further development of the strategy. A final draft of the EDI strategy will be brought to Council for final approval at its December meeting, before launching in 2021. Council will also receive the update on progress against the 2019-2020 action plan in December, and the outcome of the EDI data analyses.

When the new EDI Policy Lead is in post, they will begin to take forward the development of the external EDI forum and continue to progress the development of/engagement for the EDI strategy and 2021-22 Action plan.



## Appendix B: Council 28 July 2020, progress update on 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)	Progress update
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.	In March 2020, we made our final submission to the PSA in relation to their targeted review. As part of that, we provided additional information on:

			<p>a. the level of EDI information held by the HCPC on the composition of the registrant base</p> <p>b. how the EDI information held about registrants is analysed and used</p> <p>c. the learning and training opportunities that are provided to HCPC staff in the area of equality, diversity and inclusion.</p> <p>This information is covered in the contents of this action plan.</p>
	<p>Legal advice sought if changes are made to EDI legislation that may impact our systems and processes.</p>	<p>Record of:</p> <ul style="list-style-type: none"> <li>• legal advice received about changes in EDI legislation that may impact our systems and processes; and</li> <li>• any action taken as a consequence.</li> </ul>	<p>There has not been any EDI legislation in the action plan period.</p> <p>We have, and will continue, to monitor the outcome of the Government’s public consultation on the Gender Recognition Act 2004, and will assess any changes necessary to support our registrants, service users, employees and partners in response.</p>
	<p>Focus on EDI principles in the review of our Returning to practice guidance.</p>	<p>Record in equality impact assessments (EQIAs) that EDI considerations have been considered.</p>	<p>The Returning to Practice review has not progressed substantially since last updated. This will be progressing with the appointment of a new Senior Policy Officer in August 2020. As part of this review, we will be considering the EDI feedback submitted as part of the stakeholder engagement event in October 2019, ask stakeholders for EDI feedback in the consultation and complete an Equality Impact Assessment alongside the consultation papers and with our final decision.</p>

	Focus on 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.	The consultation papers for the Guidance on health and character review will be going to Council in September. As part of this review, we will be completing an Equality Impact Assessment (both with the consultation papers and final decision) and ask stakeholders to provide EDI feedback as part of the consultation.

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.

<b>Owner</b>	<b>Action(s)</b>	<b>Measure(s)</b>	<b>Progress update</b>
Head of Policy and Standards	Analysis of equality and diversity data collected and presented to Council annually.		In December 2019 we launched our first annual, voluntary survey of our registrants to establish a stronger base of data on registrant EDI information. The responses to the survey mean we hold contemporaneous EDI data for 5% of the Register. In July 2020 we are commissioning external research to analyse the data, which will be available to report to Council at its December meeting in 2020.
Head of Policy and Standards	Monitor and improve use, quality and consistency of equality impact assessments.	Record of equality impact assessments completed for relevant pieces of work.	We have undertaken an Equality impact assessment for the development of our proposed revisions to the Standards of proficiency. This will be reviewed in light of any feedback through the consultation currently open.  We have also considered potential EDI implications in invitation to tender documents and

			<p>when appointing research teams, for example we are doing this for the EDI data research and service user engagement we are undertaking/will be commissioning, in the second half of this action plan period.</p> <p>We have developed Equality Impact Assessments on the policy approach underpinning the COVID-19 temporary register, the changes we have made to our operational processes arising from COVID-19, and our move to home working. In completing these, we have engaged other regulators, professional bodies and other key stakeholders. We have also reviewed data available on our temporary and current registrants and analysis by charities representing protected characteristics on the impact of COVID-19. Actions identified across the impact assessments included:</p> <ul style="list-style-type: none"> <li>• Translation of content on the COVID-19 hub for the public into Welsh;</li> <li>• Regular engagement with representatives from the four countries on our approach;</li> <li>• Exploring virtual telephony services;</li> <li>• Trialling virtual hearings on Teams;</li> <li>• Outgoing phone calls to vulnerable parties with support for staff making challenging calls remotely;</li> <li>• Gather feedback from registrants on approach;</li> </ul>
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			<ul style="list-style-type: none"> <li>• Training in Registration team to recognise and support individuals that may need assistance; and</li> <li>• Home working survey.</li> </ul>
Head of Policy and Standards & Director of HR & OD	Assess the feasibility of an EDI employee group to generate ideas for development of the action plan.	Record of exercise and any agreed action.	<p>EDI was discussed at the June Employee Forum and we are currently consulting employees, about whether there should be a separate EDI forum.</p> <p>Other Senior Management Team's (SMT) proposals currently being considered by employees via the Employee Forum include:</p> <ul style="list-style-type: none"> <li>• Reverse mentoring with employees from diverse backgrounds</li> <li>• A SMT member being given overall EDI responsibility and for this to be reflected in a job title for higher visibility</li> <li>• Training a group of employees from diverse backgrounds to assist in the development of, or assessment of, Equality impact assessments</li> <li>• Providing a forum for EDI discussion on teams or the intranet.</li> <li>• Appointment of external speakers for education/debate</li> <li>• Review what other organisations are doing</li> </ul>

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

Owner	Action(s)	Measure(s)	Progress update
Director of HR & OD	Collect and analyse diversity monitoring data to: identify any trends or gaps in relation to the diversity of the HCPC workforce; identify any areas in which work may be necessary; and take associated action where identified.	Record of analysis and any agreed action.	<p>The annual reports on analyses of employee and partner EDI, recruitment and retention data are due to be presented at Council's July meeting (at the same time as this action plan update).</p> <p>The organisation continues to broadly represent the ethnic make-up of the surrounding boroughs of London in all categories, with the exception of 'Black' which though is slightly higher (19) than last year (17), this group still appears under- represented. 'Asian' would appear to be slightly over-represented at 12% in 2019 compared to 11% in 2018; whereas 'White' would appear to be slightly underrepresented at 44%. However, given the significant proportion of employees listing "prefer not to say" (19%) and the age of the census data it is difficult to draw too many conclusions from this comparison. We continue to advertise vacancies across a number of different platforms to reach a diverse pool of candidates to name a few, these are, charity jobs, Vercida, LinkedIn, Reed and Birkbeck University. Vercida are actively working with us to better market our offering to ensure people from diverse backgrounds want to apply to work for HCPC and therefore attract more applicants for roles from these groups.</p> <p>We have also made changes to our interview panel composition to take account of EDI. Interview panels are comprised of 3 – with one member specifically from a diverse background.</p>

		<p>We have also added codes to HR systems so that we can monitor trends probation, training and grievance and disciplinaries that can help us investigate if there appears to be a worrying pattern (for example, so that we can identify which diverse background may inadvertently be affected and to take action). We have just recently introduced this coding system, so there is not sufficient data to report on just yet.</p> <p>We invested in unconscious bias training with line managers, and the external provider attended as an observer, in meetings and interviews to provide feedback as to where people may have been exhibiting bias without realising this.</p> <p>Partner recruitment undergoes quality assurance during shortlisting and interview process. A certain percentage of applications will be QA'ed during legal and lay recruitment campaigns and a calibration event will ensure that shortlisters follow the same criteria. Each interview panel is being QA'ed by the Head of Partner and HR operations at least once to ensure consistency across multiple panels. Most interview panels consist of a departmental manager as well as an independent recruitment partner.</p> <p>HR also monitored panels and fed back to panels re any potential bias and then moderated training accordingly. In addition, an unconscious bias role play was built into training to identify potential bias.</p>
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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.	<p>The imagery we use on our website reflects diversity, this also applies to our social media channels and all video content.</p> <p>We have started to compile a forward planner of 'awareness' days which includes a range of multicultural and ethnic events, for example Ramdadan, National Windrush Day as well as celebration days for different professions.</p> <p>Following the tragic events in America, we published a statement blog highlighted our commitment to ED&amp;I.</p>
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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)	Progress update
Head of Policy and Standards	Improve quality and clarity of EDI resources on the HCPC website.	<p>Content is available on the HCPC website in relation to:</p> <ul style="list-style-type: none"> <li>• our standards;</li> <li>• professional values; and</li> <li>• the role of EDI in education and training.</li> </ul>	We have been carrying out reviews of webpages to improve the accessibility and quality of our content in general. However, this action (specifically in regards to the EDI resources) has not yet been progressed but will be an area of focus for the second half of the action plan period.

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

<b>Owner</b>	<b>Action(s)</b>	<b>Measure(s)</b>	<b>Progress update</b>
Head of Education	Focus on EDI principles in the review of the approach to quality assurance.	Record in equality impact assessments (EQIAs) that EDI considerations have been considered and addressed.	Decision to pilot new approach being made by ETC in June 2020. Pilot design and implementation will include assessment of EDI. Feedback from stakeholders involved will also elicit any specific EDI issues / impacts.

### **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.

<b>Owner</b>	<b>Action(s)</b>	<b>Measure(s)</b>	<b>Progress update</b>
Director of HR & OD and Head of Communications	Review and maximise our engagement and communication with external representative groups to share learning and promote diverse engagement with us.	Record of communications with external organisations.	This action has not yet been progressed due to understaffing and review in the Communications team.

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.

<b>Owner</b>	<b>Action(s)</b>	<b>Measure(s)</b>	<b>Progress update</b>
Head of Policy and Standards	Work with other regulators to develop materials and approaches to regulation which address EDI issues.	Record of EDI content on the website.	We have regularly attended and contributed at the Joint Health Regulators EDI forum and the Inter-Regulator LGBT+ network. We have initiated and learnt from the sharing of ideas and intelligence about our EDI work, particularly impacts of COVID 19. This informed our Equality Impact Assessments on the policy approach underpinning the COVID-19 temporary register, the changes we have made to our operational processes arising from COVID-19, and our move to home working. To date, we have not published any joint EDI materials with other regulators but have raised this at the June 2020 meeting and will explore options for this during the second half of the action plan period.

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

<b>Owner</b>	<b>Action(s)</b>	<b>Measure(s)</b>	<b>Progress update</b>
Head of Policy and Standards	Focus on any special measures required to reach relevant equality and diversity groups in consultations, surveys and research projects.	Record in equality impact assessments (EQIAs) for relevant projects that stakeholder mapping and targeted communications have been utilised.	To date, we have completed one Equality Impact Assessment for a consultation – the Standards of Proficiency (SOPs) review. In this, we identified a need to engage service users and organisations representing protected characteristics so they could promote the consultation widely. Patient representative groups and equality and diversity third sector organisations are currently being contacted to be asked to input into the SOPs consultation.

			<p>We also discussed in Council the need to engage international regulators of our professions, so prospective applicants are aware of the changes. We are working with the Communications and Registration teams to facilitate this.</p>
	<p>Changes to the Standards of proficiency to reflect, value and respect diversity across the four countries.</p>	<p>Record of consideration of EDI issues in relation to unique national perspectives.</p>	<p>We took an Equality Impact Assessment on the Standards of proficiency consultation papers to Council in March 2020. In this, we consider four country diversity. We reflected on the workshops we hosted in each of the four countries, and committed to taking account of the makeup of education and training across the four countries and any challenges for smaller countries or those with more remote settings.</p> <p>The public consultation, launched June 2020, has been promoted to stakeholders across the four countries. We will continue to monitor response rates in each of the countries and have included a question in the survey on country of origin to manage this.</p>
	<p>Changes to our Returning to practice guidance to reflect, value and respect diversity across the four countries.</p>	<p>Record of consideration of EDI issues in relation to unique national perspectives.</p>	<p>The Returning to Practice review has not progressed substantially since last updated. This will be progressing with the appointment of a new Senior Policy Officer in August 2020. As part of this review, we will be considering the EDI feedback submitted as part of the</p>

			stakeholder engagement event in October 2019, ask stakeholders for EDI feedback in the consultation and complete an Equality Impact Assessment alongside the consultation papers and with our final decision.
	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.	The consultation papers for the Guidance on health and character review will be going to Council in September. As part of this review, we will be completing an Equality Impact Assessment (both with the consultation papers and final decision) and ask stakeholders to provide EDI feedback as part of the consultation.

### Effective and efficient organisation

- 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)	Progress update
Head of Governance	Training for Council members on reviewing, analysing and engaging in EQIAs.	Record of training date(s) and session outline.	This action will be progressed in the second half of the action plan period, when the training is scheduled to take place.

- 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)	Progress update
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.	<p>As above under section 2: EDI was discussed at the June Employee Forum and we are currently consulting employees, about whether there should be a separate EDI forum.</p> <p>Other Senior Management Team's (SMT) proposals currently being considered by employees via the Employee Forum include:</p> <ul style="list-style-type: none"> <li>• Reverse mentoring with employees from diverse backgrounds</li> <li>• A SMT member being given overall EDI responsibility and for this to be reflected in a job title for higher visibility</li> <li>• Training a group of employees from diverse backgrounds to assist in the development of, or assessment of, Equality impact assessments</li> <li>• Providing a forum for EDI discussion on teams or the intranet.</li> <li>• Appointment of external speakers for education/debate</li> <li>• Review what other organisations are doing</li> </ul>
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.	We have posted EDI items and news on the intranet (or circulated via all employee emails) including for example Black Lives Matter, EDI and unconscious bias training and religious/faith festivals including Ramadan and Christmas as well

			as awareness and celebration days like National Pride, National Windrush Day
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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.

<b>Owner</b>	<b>Action(s)</b>	<b>Measure(s)</b>	<b>Progress update</b>
Head of Policy and Standards	Training in equality impact analysis to be undertaken by relevant staff.	Record of research into and business case developed for equality impact analysis training.	We have not yet considered equality impact assessment training, but will ensure this is taken forward over the remainder of the year.
Head of Policy and Standards (first half of action plan period) Director of HR & OD (second half of action plan period)	Reasonable adjustments e-learning to be developed for employees.	Reasonable adjustments e-learning module completed.	In 2018, we delivered waterfall reasonable adjustments training across the organisation. This is currently on our learning management system available to all.
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.	Implementation of the non-binary salutation Mx has been implemented into the Registration system.



			Guidance provided to employees on supporting the registration needs of trans individuals has also been delivered.
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.	Two compulsory E learning modules: EDI and unconscious bias, have been rolled out to all employees (re-run every two years). The deadline for completion is end of July 20. We will be able to share the data on completion rates by September. EDI eLearning will be part of the corporate induction package for a new starters induction programme from September 2020.
Partner and HR Manager	EDI e-learning to be provided to partners.	100% participation for new partners.	All new partners (100%) receive face to face EDI training during their induction training. An additional eLearning module for partners is in development and has been rolled out to Visitors already.

## 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)	Progress update
Head of Policy and Standards and Head of Registration	Commission independent research to better understand the profile of our registrants, employees and partners and influence future actions.	Research successfully commissioned and commenced within 2020.	As noted at para 2, above: In December 2019 we launched our first annual, voluntary survey of our registrants to establish a stronger base of data on registrant EDI information. The responses to the survey mean we hold contemporaneous EDI data for 5%

			of the Register. In July 2020 we are commissioning external research to analyse the data, which will be available to report to Council at its December meeting in 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.	We have recently configured our HR system and can now report on employee relation cases against EDI statistics. We have also built a new online exit interview questionnaire to capture and monitor reasons for employees leaving the organisation.
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.	The equality monitoring sections of our online application forms are now mandatory and therefore applicants are required to complete before they are able to submit. We will be able to report on response rates by end of the year as the target for this would be 100%.
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.	We are currently awaiting the first years' worth of data on the case classification framework. We expect this this month. Analysis will then be completed in advance of September Council, so it can form part of the annual report.