
Registrant Health and Wellbeing Strategy and Action Plan

Executive Summary

Improving experiences of our regulatory processes is a key focus within our proposed Corporate Strategy 2021-26.

In July 2020, SMT and Council held a workshop to discuss the findings from the 'Experiences of the Fitness to Practise Process' research by The University of Surrey.

The outputs of this research along with other intelligence has informed the HCPC's first Registrant Health and Wellbeing Strategy and action plan, which is presented to Council for approval.

Previous consideration	These papers have been considered by SMT at their 10 November and 24 November meetings. The Council has taken part in a workshop on Registrant experiences and provided direction to the Executive on the need for the presented Strategy.
Decision	The Council is asked to approve the Registrant Health and Wellbeing Strategy and Action Plan for publication.
Next steps	Following approval by Council, we will launch the Strategy and Action Plan in early 2021. This will be communicated with stakeholders.
Strategic priority	The strategic priorities set in 2018 are no longer current.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.
Financial and resource implications	Financial and resource implications for the measures will need to be determined with relevant action holders. We do not anticipate this will be significant, as the vast majority of this work is already accounted for in department work plans, but will continue to engage Heads of and SMT to further understand the impact on departments.
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Registrant Health and Wellbeing Strategy and Action Plan

1. Introduction

- 1.1 In July 2020 of this year the University of Surrey reported on their HCPC commissioned research on the registrant experience of fitness to practise. This provided us with rich data that, along with other intelligence we have gathered, has informed our first Registrant Health and Wellbeing Strategy and accompanying action plan.
- 1.2 Our intention is that this strategy, and the action plan that supports it, help us embed a more human approach to regulation across the HCPC. We plan to launch the strategy and action plan on a dedicated part of the website in January, which will we use to highlight our progress in this area.

2. Links to other Strategies and Frameworks

- 2.1 Improving experiences of our regulatory processes is a key focus within our proposed Corporate Strategy 2021-26.
- 2.2 The Registrant Health and Wellbeing Strategy and Action Plan references language in the draft Corporate Strategy 2021-26, EDI Strategy and Action Plan and Professionalism and Prevention Framework. As all of these pieces of work are still subject to final approval from Council, and so the language in this document may change. In advance of publication, we will ensure these documents are aligned and we adopt a consistent approach.

3. EDI

- 3.1 An equality diversity and inclusion impact assessment has been undertaken for this Strategy and action plan. This can be found at appendix C.

4. Risk

- 4.1 There are risks associated with this work and in particular the research findings if we do not take appropriate action. In particular, there is a risk that lack of action would impact on our status as a trusted regulator and our ability to meet stakeholder expectations.
- 4.2 The action plan and strategy intend to mitigate these risks, by clearly demonstrating our commitment to improve in this area. What is key is maintaining momentum on delivery of our planned improvements.

5. Appendices

- Appendix A: Registrant Health and Wellbeing Strategy 2021-24
- Appendix B: Registrant Health and Wellbeing Action Plan
- Appendix C: Equality, Diversity and Inclusion Impact Assessment

Foreword

Our primary purpose is to protect the public, but as we do so we want to lead with kindness and compassion.

By focusing our attention on supporting our registrants, we hope to build trust in our processes, increase stakeholder engagement and understanding, and continue to deliver our regulatory objectives.

We know regulatory processes are challenging for all those involved, particularly our fitness to practise processes. We are working hard behind the scenes to ensure that regulatory reform supports us to regulate in a way that puts people at the heart of everything we do. That said, we know there is more we can do within our current legislative framework to support, guide and assist our registrants; shifting the focus as far as possible from adversarial interactions to supportive ones that help to build professionalism.

In July of this year, the School of Health Sciences at Surrey University, led by Professor Jill Maben, reported on the research we commissioned them to undertake on the registrant experience of fitness to practise¹. This provides us with rich data that, along with other intelligence we have gathered, has informed our Registrant Health and Wellbeing strategy and accompanying action plan. Whilst the focus of this research was on our fitness to practise function, we know that the issues highlighted in the research report extend across all our regulatory functions.

Our intention is that this strategy, and the action plan that supports it, help us embed a more human approach to regulation across the HCPC.

¹ <https://www.hcpc-uk.org/globalassets/meetings-attachments3/council-meeting/2020/04.-28.07.2020/enc-09---experiences-of-the-fitness-to-practise-process--research-report.pdf>

Summary

Vision

We exhibit empathy in all our interactions, demonstrate fairness in all that we do, and cultivate professionalism through a supportive, transparent and collaborative approach.

Strategic aims

We will achieve our vision by taking forward seven strategic aims:

1. Taking a person centred approach which accounts for context and demonstrates empathy and understanding.
2. Leading with fairness and advocating equality, diversity and inclusion.
3. Listening, learning and communicating well.
4. Enacting processes in a timely way; giving regular updates and responses.
5. Delivering clear, open and transparent processes and decisions.
6. Actively engaging with stakeholders to ensure the right action at the right time.
7. Increasing focus on fostering professionalism.

What success will look like

Success will deliver the following outcomes:

- We provide good customer service and deliver timely, empathetic communications.
- We reach fair and proportionate decisions which take account of context.
- We are approachable and engaged with registrants and their employers.
- Stakeholders see us act on their feedback.
- The promotion of professionalism is evidenced in all that we do.

About the HCPC

Our purpose

To uphold the highest standards in the professions we regulate so that we protect the public and inspire their confidence

Our vision

To be the UK's foremost healthcare multi-profession regulator

Our values

- **Fair** – being open, honest and transparent.
- **Compassionate** – treating people with respect, empathy and care.
- **Inclusive** – collaborating with others and valuing diversity.
- **Enterprising** – being resourceful and creative, seeking opportunities to innovate and drive efficiency.

What our intelligence tells us

We gather intelligence across our regulatory functions by undertaking internal research, commissioning external research, analysing corporate complaints, collating general feedback and enquiries, and considering the findings and recommendations from public inquiries.

The themes arising from this intelligence in relation to registrant health and wellbeing, and in particular the impact our processes can have in this regard are consistent. These are:

- **increasing pressures in the workplace** both in demand and expectations increases stress and the prevalence of mental health issues amongst healthcare professionals, this creates a risk to service users;
- **doing more with less** leads to mistakes and risks to service users;
- **registrants are fearful of their regulator**, adding to their stress;
- **there is confusion about the role of the regulator** and when our fitness to practise processes should be engaged;
- **our communication has a big impact** and there is scope for improvement in our approach;
- **we need to engage more with our stakeholders** to support their understanding and improve what we do;

- **there is more we can do to be a transparent organisation**, through clarity and openness;
- **our processes need to be more efficient**, we need to reduce the time those processes take and take greater account of the needs of our stakeholders; and
- **we need to increase our support offer** and use our voice to encourage others to do the same.

Strategic aims

We have set seven strategic aims that will also us to achieve our vision:

We exhibit empathy in all our interactions, demonstrate fairness in all that we do, and cultivate professionalism through a supportive, transparent and collaborative approach.

Each strategic aim establishes where we are now, our objective, what we will do and where we expect to be.

Strategic aim one: Taking a person centred approach which accounts for context and demonstrates empathy and understanding.

Where we are now

We gather intelligence from a number of sources, as set out above, which tell us that some registrants have negative experiences of engagement with us, or know someone else who has had a negative experience of engagement with us. Whilst we strive for, and largely succeed in, providing good customer service, we recognise that any bad experience is one too many.

Objective

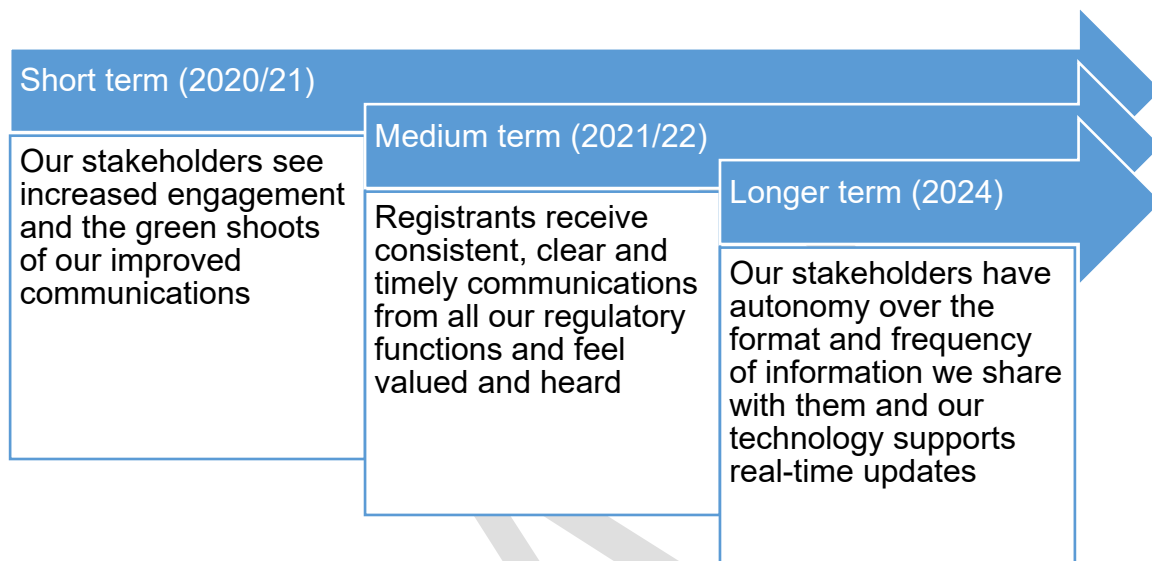
To ensure every interaction a registrant has with the HCPC takes account of their circumstances, and demonstrates compassion and professionalism.

What we will do

- Establish consistent points of contact to ensure stakeholders can have effective and timely interactions with us, and feel valued and supported.
- Facilitate preferred means of communication wherever possible to provide the best customer experience and be inclusive.
- Facilitate the registrant's voice throughout the process to help with the sharing of information, speed processes up and reduce stress.

- Use advancements in our systems to support our stakeholders in keeping up to date with the progress of applications, complaints, cases and enquiries.

What we expect to see



Strategic aim two: Leading with fairness and advocating equality, diversity and inclusion

Where we are now

The pressures on our registrants in the workplace now exceeds anything past registrants have faced. Workforce shortages, increased demand, and higher service user expectations are a few of contributory factors. Additional pressures on healthcare professionals can lead to mistakes, and mistakes can lead to harm.

We know that some of our processes add to those pressures and we've taken steps to reduce negative impacts. There is more to be done though, particularly in relation to our understanding of equality, diversity and inclusion issues and the actions we take as a result.

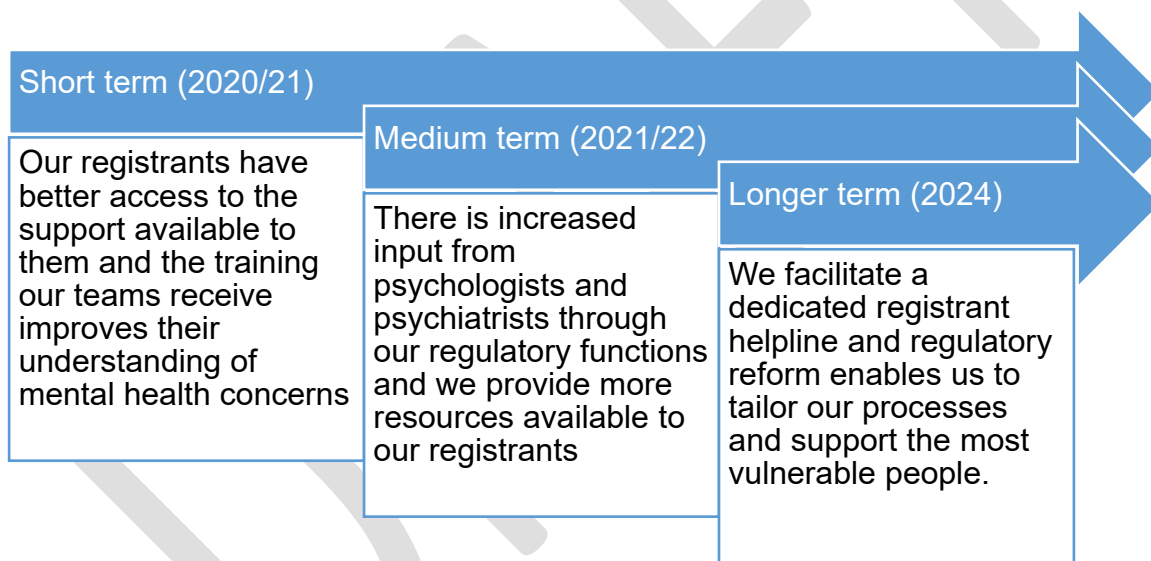
Objective

We want to reduce the risk of harm by improving our support offer, and showing a fair and compassionate approach.

What we will do

- Influence stakeholders to improve registrant’s access to mental health support so our registrants receive the same support available now for doctors.
- Better signposting to sources of support and advice across our regulatory functions to give registrants a single source of information, whatever their needs are.
- Establish a registrant helpline to give individual, confidential advice.
- Developing specific team capabilities to manage vulnerable registrant cases
- Collect and use our EDI data across our Regulatory functions and systems, to analyse impacts from our processes on protected groups, so we can take action to address these impacts.

What we expect to see by 2024



Strategic aim three: Listening, learning and communicating well

Where we are now

We have commissioned research, held stakeholder events, and analysed the feedback we receive. We have learned and have taken steps to address the issues that have been raised with us, but there is more that we should do.

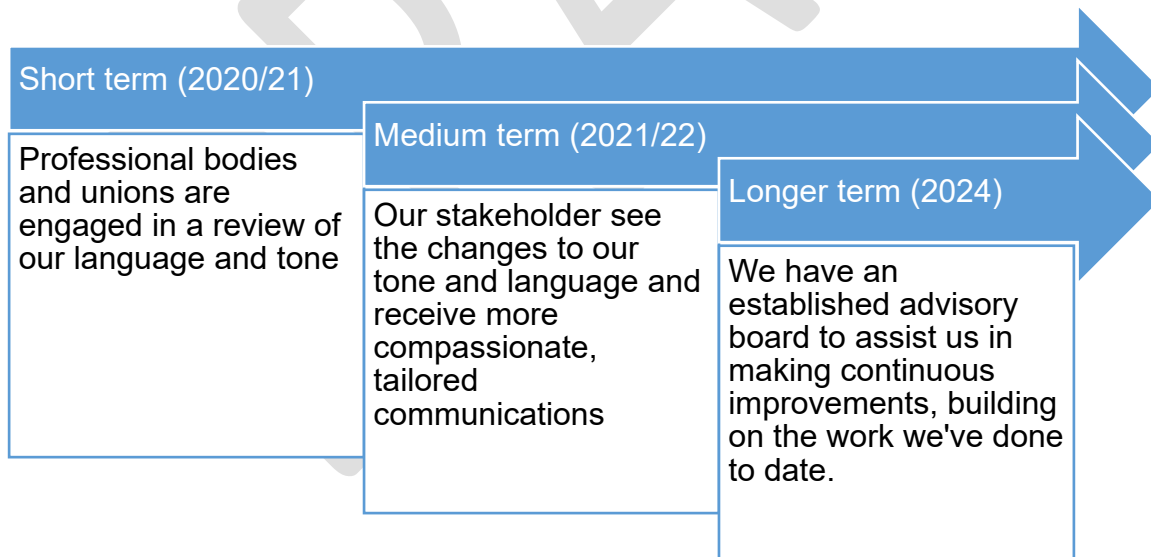
Objective

We want to significantly increase the engagement we have with all our stakeholders, and work with them to address concerns and issues. We hope to deliver improvements in our communication so that everyone we engage with feels valued and heard.

What we will do

- Undertake a review of our tone of voice to improve how we communicate, making it more human, accessible and compassionate. We will also place a greater emphasis on personalised communications, tailored to the individual and their needs.
- Review the size of documents we send to stakeholders, in particular bundles of information sent out during an investigation, to ensure it is clear and accessible, and doesn't overwhelm the recipient.
- Development of an Advisory Board to support further improvements across all that we do.

What we expect to see



Strategic aim four: Enacting processes in a timely way, giving regular updates and responses

Where we are now

We accept our processes are too lengthy and often cause stress and anxiety for our registrants. We know the frequency of some of our communications could be improved, and our response times can be slow. We've made really good progress over recent months in relation to our approach to corporate complaints and we want to emulate this throughout our organisation.

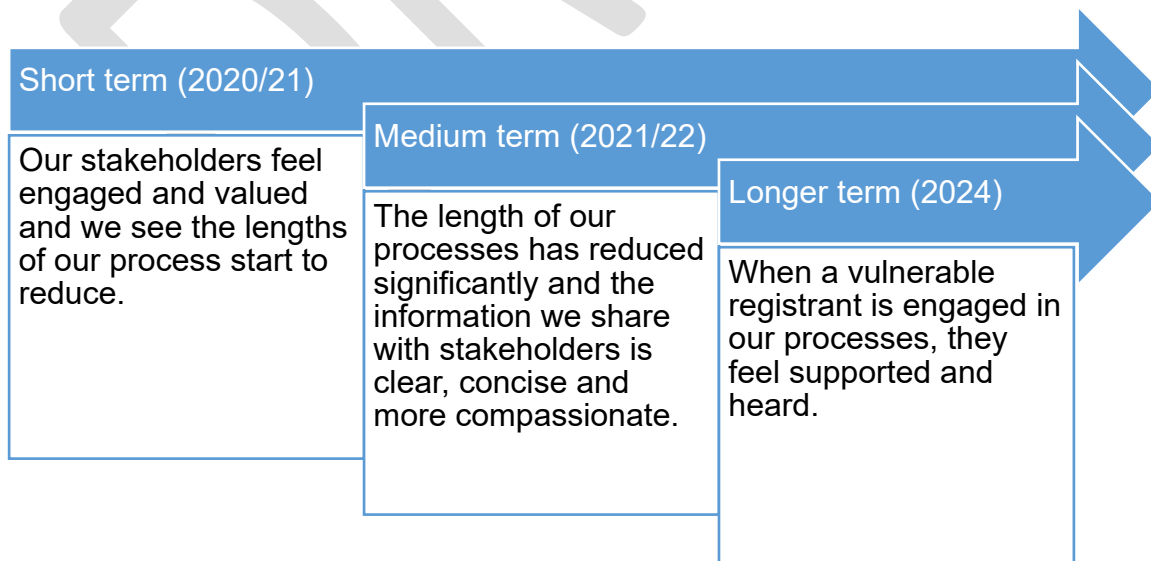
Objective

To reduce the length of our processes. Where we are reliant on external information and that is delayed, we keep our stakeholders updated. When people get in touch with us, we prioritise a clear, swift response.

What we will do

- Reduce length of time cases take to progress through FTP to reduce stress and costs for all.
- Make processes less adversarial and more engaging.
- Tailor processes when a registrant is particularly unwell.

What we expect to see



Strategic aim five: Delivering clear, open and transparent processes and decisions

Where we are now

Whilst we provide guidance, tools and information across our functions, some stakeholders struggle to navigate our processes and understand our decisions.

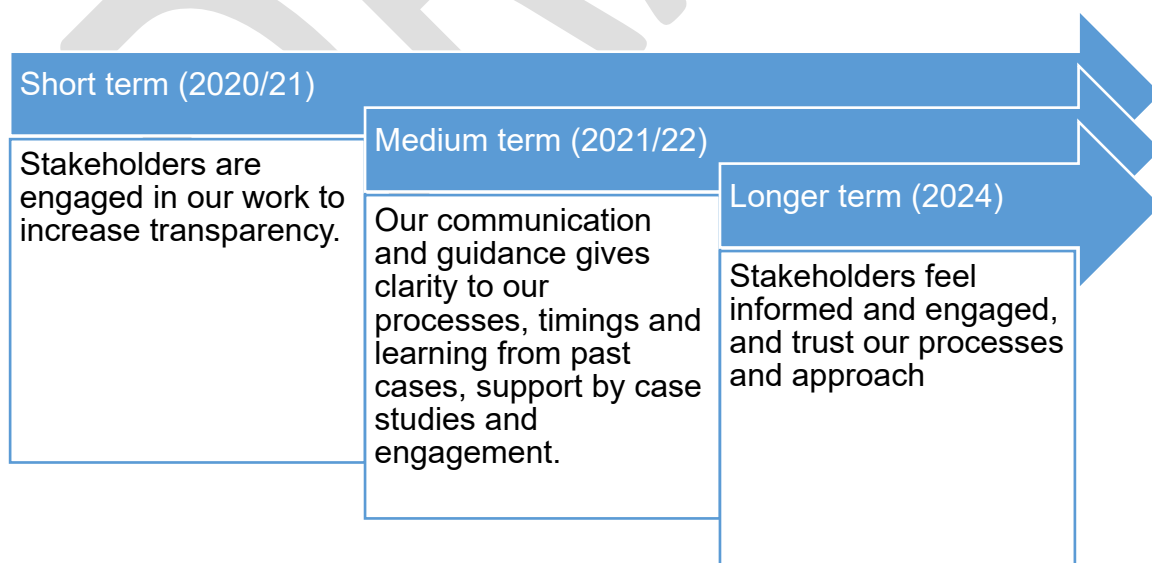
Objective

We want all those who engage our regulatory processes to understand the steps we will take, be given realistic timescales, and understand the likely outcomes.

What we will do

- Ensure we are open about how we handle / use information in our regulatory processes shared to facilitate understanding and assist learning.
- Share learning from past FTP cases with registrants so they know what to expect and don't worry unnecessarily about being removed from practice.
- Ensure we are open and honest about timings of our regulatory processes to reduce the stress on registrants.
- Greater transparency regarding decisions across our regulatory functions to facilitate understanding and assist learning.

What we expect to see



Strategic aim six: Actively engaging with stakeholders to ensure the right action at the right time

Where we are now

Most stakeholders understand our remit and approach, but some don't. This means that we might not receive the right type or volume of referrals and is exacerbated by myths attached to some of our processes, which reduces the level of engagement we see from registrants. Engagement which would often serve to expedite matters in a way which takes account of all information.

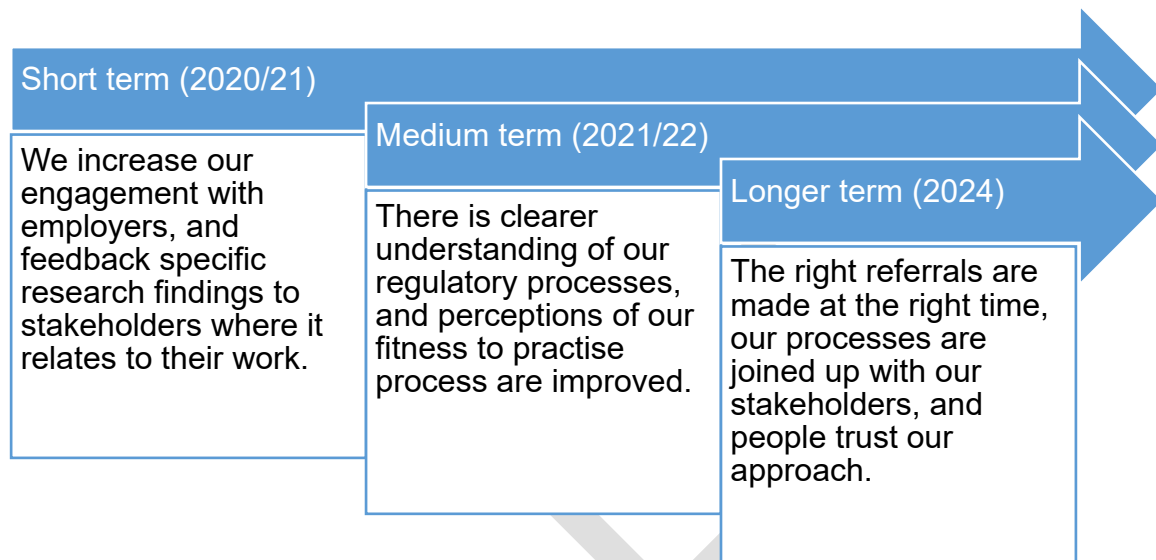
Objective

To bust the myths around our processes and educate our stakeholders about our processes, and when to engage them, for the benefit of our registrants and ultimately service user safety.

What we will do

- Improve our stakeholder's understanding of our policies and processes, with a particular focus on FTP.
- Improve perceptions of FTP to reduce stress and increase beneficial engagement.
- Employer engagement to educate about referrals and ensure consistency.
- Share feedback from research with stakeholders; both in relation to the work of the HCPC but also their own processes.

What we expect to see



Strategic aim seven: Increasing focus on fostering professionalism

Where we are now

We have clear and accessible guidance to support the more challenging areas of practice, such as confidentiality. However, as our professions’ scopes of practice and medicine entitlements develop there is much more we could do through formal and informal guidance and tools. Where concerns are raised through FTP there are gaps in the support offered to harness learning.

Objective

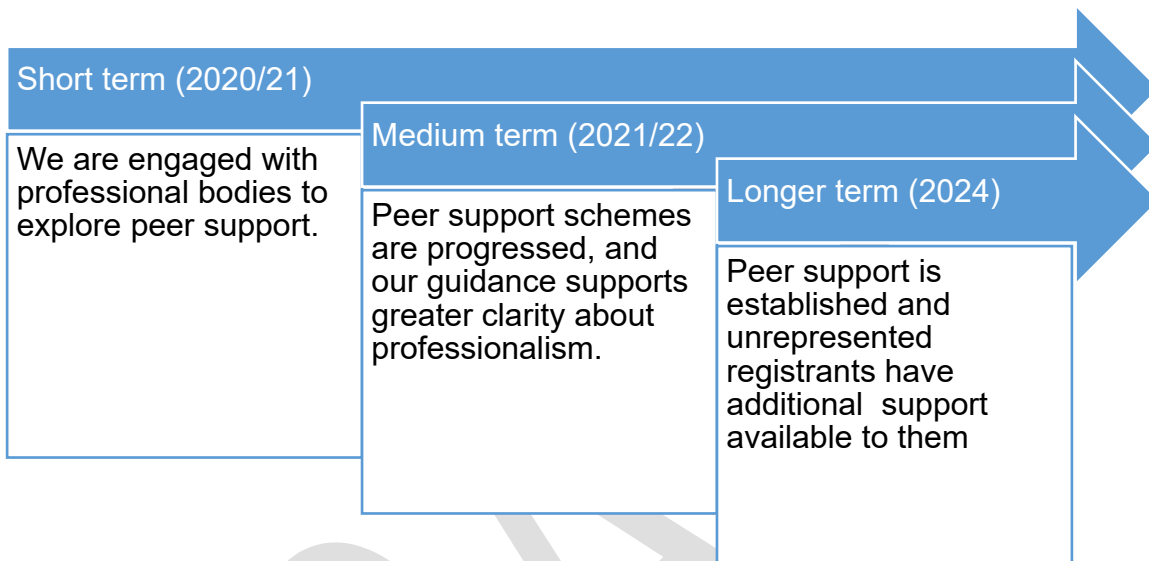
To improve the offer of guidance, support and information on our website, and to consider ways in which we can focus on harnessing the findings of FTP investigations to support greater learning for individual registrants and the wider registrant population.

What we will do

- Create guidance on specific elements of our processes to better support registrants.
- Explore possible Peer Support Scheme (initially for FTP) to ensure registrants access learning through our processes.

- Support learning and professionalism through hubs, information sheets and toolkits.
- Explore mechanisms to support unrepresented registrants.

What we expect to see



DRAFT

Registrant health and wellbeing action plan

The Registrant health and wellbeing strategy 2021-2024 sets out how we will work towards our vision to:

Exhibit empathy in all our interactions, demonstrate fairness in all that we do, and cultivate professionalism through a supportive, transparent and collaborative approach

This action plan builds upon ‘what we will do’ sections of the Strategy, establishing clear deliverables for the organisation to meet over the short, long and medium term. It is split thematically, capturing the key research findings and recommendations.

Timescales for short term actions are set out in quarters, whilst longer term actions have more open timescales to account for unexpected future impacts.

Embedding learning

Both this research and other intelligence from across the organisation provides learning about our impact on registrants. We want to make sure this learning is embedded into the wider learning and development of the organisation, and we continually reflect the findings as this work progresses and beyond. We also want to highlight and build on positive feedback, to ensure we retain what we currently do well.

Area	Activities and timescales	Owner	Strategic aim
Embed the findings of the research into all employee learning and development	Share the Registrant’s experiences film and report findings with FTP and ensure FTP views feed into this work on an ongoing basis (Q3 20/21) <i>All FTP will have seen the film and a presentation on the findings by December Council</i>	Head of FTP Policy Manager	Strategic aim three: Listening, learning and communicating well
	Publish the research findings on the website and develop a communications plan to allow wider	Policy Manager	Strategic aim six: Actively engaging with stakeholders to ensure

	sharing of the Registrant's experiences film with participants and key stakeholders (Q4 20/21)	Digital Communications Team	the right action at the right time
	Wider communication of the research report, Registrant's experience film, Registrant health and wellbeing action plan and strategy across the organisation (to commence Q1 21/22)	Head of Registration Head of HR Internal Communications Manager	
	Incorporate the research and Registrant's experiences film into ongoing all employee learning and development and inductions (to commence Q2 21/22)	Head of HR	
Collect and share examples of good customer service	QA and Complaints teams to establish current process of collecting feedback and reinforcing positive learning (to commence Q4 20/21)	QA Manager Complaints Manager	Strategic aim three: Listening, learning and communicating well Strategic aim six: Actively engaging with stakeholders to ensure the right action at the right time
	On an ongoing basis, throughout this work, share positive examples of customer service with the teams and build into learning associated with this work (ongoing)	QA Manager Complaints Manager Policy Manager Head of HR	
	Where areas for improvement are identified, this will be reviewed and reflected in this and department's work plans (ongoing)	QA Manager Complaints Manager Policy Manager	
Revisit the research and collect data to measure success	Establish data across the organisation that we can use as success criteria for this work (planning to commence Q1 21/22)	Insight and Intelligence Lead Policy Manager QA Manager	Strategic aim three: Listening, learning and communicating well
	Collect and use our EDI data across our Regulatory functions and systems, to analyse impacts from our processes on protected groups, so we can take action to address these impacts. ¹ (ongoing)	EDI Policy Manager Insight and Intelligence Lead	

¹ See 2020 EDI Action Plan for more detail.

	Consider either repeating this research or focusing on a new area of HCPC to capture registrant's experiences. Alternatively, build regular surveys into our business as usual work e.g. Stakeholder perceptions surveys (2023/24)	Head of Policy and Standards Head of Communications	
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Improving how we communicate

The research clearly demonstrates a link between how we communicate with registrants and the impact of our processes on their health and wellbeing. It also reveals misconceptions about our purpose. We want to review how we communicate with registrants, across our regulatory functions, to make this more human and compassionate. We also want to reflect on the user experience of registrants going through these processes, and so improve the consistency, pace and accessibility of our communications.

Area	Activities and timescales	Owner	Strategic aim
Undertake a tone of voice review to improve how we communicate, making it more human, accessible and compassionate.	Prioritisation exercise of current templates and contents (Q4 20/21)	Policy Manager QA Manager Head of FTP Head of Registration	Strategic aim three: Listening, learning and communicating well
	Review of correspondence templates commences (Q1 21/22)		
	Development of employee training and guidance materials (to commence Q2 21/22)	Head of HR	
	Tone of voice review and changes to templates complete (Q1 22/23)	Policy Manager QA Manager Head of FTP Head of Registration	
Place greater emphasis on personalised communications, tailored to the individual and their needs.	Tone of voice review to consider where we can tailor templates to likely outcomes / the registrant's needs (complete by Q1 22/23)	See Tone of Voice review	Strategic aim three: Listening, learning and communicating well
	Progress regulatory reform, which will allow us to revise our processes depending on the allegation and likely outcome (timescales subject to Government, ongoing)	SMT Head of SMT	

Review the volume and pacing of communications to registrants across our regulatory functions	Tone of voice review to establish current touch points in our FTP and Registration processes (complete by Q1 22/23)	See Tone of Voice review	Strategic aim four: Enacting processes in a timely way, giving regular updates and responses
	ShareDo to allow us to report on how long it has been since a registrant has been contacted, as well as establish mechanisms to notify the team to get in touch with a registrant, in advance of key dates in their case and to check in on their wellbeing (2022/23)	Head of FTP Head of Digital Transformation	
	Revise systems across our regulatory functions so registrants can monitor their engagement with HCPC to date and see the status of their application/ case etc, ideally automated (2023/24)	Head of FTP Head of Registration Head of Digital Transformation	
Establish consistent points of contact to ensure stakeholders can have effective and timely interactions with us, and feel valued and supported	Tone of voice review to establish how we introduce points of contact and what expectations we set regarding consistency (complete by Q1 22/23)	See Tone of Voice review	Strategic aim one: Taking a person centred approach which accounts for context and demonstrates empathy and understanding.
	Analyse data across public facing departments to see how often enquiries from registrants are passed on to multiple colleagues, and the impact that has on time it takes for them to get advice and the likelihood of a complaint (2022/23)	Insight and Intelligence Lead QA Manager	
	Develop an FTP People Plan focused on recruitment, retention and staff development (Q4 20/21)	Head of FTP	
	Implement improved induction and leaving process for FTP staff i.e. ensuring robust onboarding and planning for handover when someone leaves) and implement rolling recruitment for key roles (Q1 21/22)	Head of FTP	

	Building on the outcome of internal research, establish an agreed process across regulatory functions regarding named contacts and ongoing communication with registrants (to commence Q21/22)	Head of FTP Head of Registration Insight and Intelligence Manager QA Manager	
Review the size of documents we send to stakeholders, in particular bundles of information sent out during an investigation, to ensure it is clear and accessible, and doesn't overwhelm the recipient	ShareDo to improve current system's ability to collate information for bundles (go live Q4 20/21)	Head of FTP Head of Digital Transformation	Strategic aim three: Listening, learning and communicating well
	Share findings from the research with legal team / new legal services provider (Q1 21/22)	Head of FTP	
	FTP and legal services provider to undertake a review of how bundles are presented and establish where this can be reduced	Head of FTP	
	Continue to progress Regulatory Reform, which will allow us to influence requirements for bundles (timescales subject to Government, ongoing)	SMT Head of FTP	

Stakeholder engagement

As well as improving how we communicate, it is important we improve our engagement with employers and key stakeholders to both address misconceptions about our remit but also to improve understanding of our processes and how they can best support registrants.

Area	Activities and timescales	Owner	Strategic aim
Bring out the human side of the regulator	Increase online presence of HCPC employees, through visuals and videos on social media, and greater showcasing of the work we do or activities we get involved in (ongoing)	Head of Communications	Strategic aim one: Taking a person centred approach which accounts for context and demonstrates
	Targeted stakeholder perceptions survey, based on the findings of this research, to establish the views	Head of Communications	

	of key stakeholders on how we can improve in this area (Q2 21/22)	Head of Policy and Standards	empathy and understanding.
<p>Improve our stakeholder's understanding of regulation and our regulatory functions – with a particular focus on Fitness to Practise.</p> <p>Influence other stakeholders to improve perceptions of Fitness to Practise (both in and out of the workplace)</p>	Continue to work with the Traverse Project, on their 'Regulation Literacy' work (ongoing)	Head of FTP Head of Policy and Standards	<p>Strategic aim six: Actively engaging with stakeholders to ensure the right action at the right time</p>
	Engage key stakeholders to establish key misconceptions and where communications can be improved (to commence Q1 21/22)	Head of Policy and Standards Professionalism and Upstream Regulation Lead	
	Communications Team to develop a communications plan building on the findings of the engagement and stakeholder survey (published Q3 21/22, to run for remainder of Strategy period)	Head of Communications Professionalism and Upstream Regulation Lead	
	See also planned engagement in our Professionalism and Prevention Framework ² (ongoing)	Professionalism and Upstream Regulation Lead	
Improve employers understanding of when to refer matters to HCPC and ensure consistency across our investigations and communications	<p>Full actions and timescales relating to this action are set out in the Professionalism and Prevention Framework³. This includes the development of:</p> <ul style="list-style-type: none"> • Employer e-news • An Employer Hub • Employer events programme • A support service for employers 	Professionalism and Upstream Regulation Lead Head of FTP	<p>Strategic aim six: Actively engaging with stakeholders to ensure the right action at the right time</p>

² <https://www.hcpc-uk.org/globalassets/meetings-attachments3/education-and-training-committee/2020/8.12.11.2020/enc-03---professionalism-and-prevention-framework.pdf>

³ <https://www.hcpc-uk.org/globalassets/meetings-attachments3/education-and-training-committee/2020/8.12.11.2020/enc-03---professionalism-and-prevention-framework.pdf>

Influence stakeholders to improve registrant's access to mental health support so our registrants receive the same support available now for doctors	Sign up to an MOU with Scottish Government about providing mental health support to AHPs (Q3 20/21) <i>This action is complete</i> ⁴	SMT Head of Policy and Standards	Strategic aim two: Leading with fairness and advocating equality, diversity and inclusion
	Promote the Scottish MOU with counterparts in England, Wales and Northern Ireland, and encourage them to also consider similar schemes (Q3 20/21) <i>This action is complete</i>	Head of Communications	
	Continue to engage stakeholders across the professional bodies, Government and employers on the provision of mental health support (ongoing)	Professionalism and Upstream Regulation Lead Head of Communications	

Transparency

Uncertainty across our processes was a clear cause of anxiety and distress amongst registrants. Registrants expressed concerns about the timings of Fitness to Practise and wanted more certainty of likely outcomes for their allegation / case. Registrants also wanted greater transparency when it came to HCPC's decision making, and how we use their information. This is of relevance to not only Fitness to Practise, but also other regulatory functions such as Registration applications and CPD audits.

Area	Activities and timescales	Owner	Strategic aim
Ensure we are open about how we handle / use information in our regulatory processes shared to facilitate	Tone of voice review to consider how we currently ask for information from registrants (complete by Q1 22/23)	See Tone of Voice review	Strategic aim five: Delivering clear, open and transparent processes and decisions
	Develop guidance for registrants on how we use evidence statements in FTP (2022/23)	Head of FTP	

⁴ <https://www.hcpc-uk.org/globalassets/about-us/who-we-work-with/nhs-practitioner-health-nhsph.pdf>

understanding and assist learning	Development of employee training and guidance materials (2023/24)	Head of HR	
Share learning from past FTP cases with registrants so they know what to expect and don't worry unnecessarily about being removed from practice.	Tone of voice review to review how we communicate learning from past FTP cases and CPD audits (complete by Q1 22/23)	See Tone of Voice review	Strategic aim five: Delivering clear, open and transparent processes and decisions
	Develop guidance and resources, such as case studies, to inform registrants of the relevant learning from past FTP cases (to commence Q2 22/23)	Head of Policy and Standards Head of HR	
Ensure we are open and honest about timings of our regulatory processes to reduce the stress on registrants	Deliver targeted communications at registrants about the work we are currently doing to improve lengths of cases in FTP (to commence Q1 21/22)	Head of Communications Head of FTP	Strategic aim five: Delivering clear, open and transparent processes and decisions
	Tone of voice review to consider how we best inform registrants of likely timescales (complete by Q1 22/23)	See Tone of Voice review	
	ShareDo to improve ability to estimate timings for cases and share this with registrants wherever possible (go live Q4 21/22)	Head of FTP Head of Digital Transformation	
	Review KPIs regarding responsiveness and ensure we can meet (2022/23)	Head of FTP Head of Registration	
	Develop interactive FTP and Registration systems which allow registrants to track the status and predicted timescales of their application / renewal / CPD audit / FTP case (2023/24)	Head of Registration Head of FTP Head of Digital Transformation	
Greater transparency regarding decisions across our regulatory functions to facilitate understanding and assist learning.	Tone of voice review to consider how we currently communicate decision making and improve transparency about this process (complete by Q1 22/23)	See Tone of Voice review	Strategic aim 5: Delivering clear, open and transparent processes and decisions
	Develop guidance for registrants on how we prepare allegations in FTP and why they might change during the FTP process (2022/23)	Head of FTP	

Proportionate processes

The disproportionate nature of our Fitness to Practise processes was a key theme in the research. The length of time a case takes to progress, and the adversarial and one-size-fits-all nature of the process was questioned by registrants. As part of our wider work on Regulatory Reform, we will be looking at how we can improve this and better tailor our processes. Some of this work may also be relevant to our wider regulatory functions, such as CPD.

Area	Activities and timescales	Owner	Strategic aim
Reduce the length of time it takes for a case to progress through Fitness to Practise to reduce stress and costs for all	ShareDo to produce streamlined FTP process and automated work flows, including better reporting and oversight of case progression (from Q1 21/22)	Head of FTP Head of Digital Transformation	Strategic aim 4: Enacting processes in a timely way, giving regular updates and responses
	New stakeholder engagement plans with ShareDo to allow for targeted communication plans for registrants and complainants (from Q1 21/22)	Head of FTP Head of Digital Transformation	
	Introduction of technical complexity case assessments and use of expert advice pre-ICP on identified cases (from Q1 21/22)	Head of FTP	
	Progress regulatory reform which will improve the flexibility of our processes (timescales subject to Government, ongoing)	SMT Head of FTP	
Make processes less adversarial and more engaging	Review of how we manage substantive orders and monitor cases post-hearing to provide better registrant support where possible (Q1 21/22)	Head of FTP	Strategic aim 4: Enacting processes in a timely way, giving regular updates and responses
	Introduction of improvements to substantive review management (Q1 21/22)	Head of FTP	
	Front loading of investigations to obtain witness statements and other evidence pre-ICP for relevant cases (Q4 21/22)	Head of FTP	

	Tone of voice review to review our correspondence and guidance to support early engagement from registrants (complete by Q1 22/23)	See Tone of Voice review	
	Review of support for unrepresented registrants, to include providing clear information about what registrants can expect from the hearing process and what a hearing involves. (to commence Q1 2021-22)	Head of FTP	
	Progress regulatory reform which will improve the flexibility of our processes (timescales subject to Government, ongoing)	SMT Head of FTP	
Tailor processes where a registrant is particularly unwell	Tone of Voice review to agree touch points to understand a registrant's wellbeing / health and trigger changes in our templates and approach (complete by Q1 22/23)	See Tone of Voice review	Strategic aim 4: Enacting processes in a timely way, giving regular updates and responses
	Progress regulatory reform which will improve the flexibility of our processes (timescales subject to Government, ongoing)	SMT Head of FTP	

Incorporating the Registrant's voice

In this research, registrant's expressed frustration at feeling like their voice was not heard. They wanted more opportunities to get their story across, so HCPC can learn from their experiences. We want to build the registrant's voice into all our work, so that improvements are made with their experiences in mind wherever possible.

Area	Activities and timescales	Owner	Strategic aim
Facilitate preferred means of communication wherever possible to provide the best	Go live with ShareDo, which will allow us to better track registrant's communication preferences and other information such as their health or personal stressors (go live Q4 20/21)	Head of FTP Digital Transformation Lead	Strategic aim 1: Taking a person centred approach which accounts for

customer experience and be inclusive.	Consider retaining virtual means of communication / hearings post COVID-19, as part of the new normal work (2021/22)	Head of FTP Head of Registration Head of Digital Transformation	context and demonstrates empathy and understanding.
Facilitate the registrant's voice throughout the process	Tone of voice review to reflect on what options registrant's currently have to engage in our processes (complete by Q1 21/22)	See Tone of Voice review	Strategic aim 1: Taking a person centred approach which accounts for context and demonstrates empathy and understanding.
	Consider how we can increase face to face or phone call interactions with registrants, as part of the new normal work (2021/22)	Head of FTP Head of Registration Head of Digital Transformation	
	Review how we can support registrants to engage early on in the FTP process (2021/22)	Head of FTP	
	Build registrant impact statements into the FTP process, so data can be collected for future learning (2021/22)	QA Manager Head of FTP Insight and Intelligence Lead	
	Progress regulatory reform which will improve the flexibility of our processes (timescales subject to Government, ongoing)	SMT Head of FTP	
Develop an Advisory Board to support further improvements across all that we do	Reflect on the outcome of the service user engagement project, and consider if additional research required to consider options for best setting up an Advisory Board (2022/23)	Head of Policy and Standards Insight and Intelligence Lead	Strategic aim 3: Listening, learning and communicating well
	Progress the selection of registrants and the structure / approach to the Board (2023/2024)		
	Go live of the Advisory Board (2024)		

Enhancing support

The research findings identified registrants' experience inconsistent levels of support and advice from HCPC, employers, peers and organisations like their professional body or trade union. Registrants also suffered financially and emotionally. Whilst the findings focus on FTP, this extends across all our regulatory functions. CPD, applications and renewal are all more challenging where registrants are struggling, so it is important that we provide support wherever we can alongside our regulatory functions.

Area	Activities and timescales	Owner	Strategic aim
<p>Improve the consistency and level of support registrants receive from their professional body and / or trade union</p> <p>Ensure the support from professional bodies and trade unions does not contradict advice or guidance issued by HCPC</p>	<p>Meet with the professional bodies and trade unions to discuss the research findings and our wider Registrant health and wellbeing work (to commence Q1 21/22)</p>	<p>Head of Policy and Standards</p>	<p>Strategic Aim 6: Actively engaging with stakeholders to ensure the right action at the right time.</p>
	<p>Ensure professional bodies and trade unions are engaged throughout the delivery of key actions, including:</p> <ul style="list-style-type: none"> • Tone of voice review • Development of guidance • Professionalism content development • 'Myth busting' relating to FTP <p>(See individual action's timescales)</p>	<p>See relevant actions for owners</p>	
<p>Improve HCPC's signposting to sources of support and advice for registrants across our regulatory functions</p>	<p>Publish the outcome of our previous research into registrant health and wellbeing, the University of Surrey's film on Schwartz Rounds (Q3 20/21) <i>This action is complete⁵</i></p>	<p>Policy Manager Digital Communications Team</p>	<p>Strategic Aim 2: Leading with fairness and advocating equality, diversity and inclusion</p>
	<p>Launch a consultation on the review of the Guidance on health and character, with a key focus on improving support for registrants (Q4 20/21)</p>	<p>Head of Policy and Standards</p>	

⁵ <https://www.hcpc-uk.org/registrants/learning-material/reflecting-on-your-practice-and-its-emotional-impact-with-schwartz-rounds/>

	Review the Concerns and Registration pages and the Registrants hub to identify where we currently signpost to advice. Ensure employment, finance and advocacy support services are included (Q4 20/21)	Head of FTP Head of Registration Digital Communications Team	
	Create a new section on the website to house the Registrant health and wellbeing strategy and action plan and other relevant content (Develop Q4 20/21, publish Q1 21/22)	Policy Manager Digital Communications Team	
	Launch a consultation on the Returning to practice process and guidance review, with a key theme of improving support for registrants (Q1 21/22)	Head of Policy and Standards	
	Develop employee training on the potential impact of our processes on registrants and when and where to signpost for further advice (Develop and roll out in 21/22)	Learning and Development team	
Explore mechanisms to support unrepresented registrants going through the Fitness to Practise process, with the aim of reducing the inequalities in their case outcomes compared to represented registrants	Engage professional bodies and trade unions on what support they provide, e.g. legal, financial, advice, and identify gaps (to commence Q4 20/21)	Head of Policy and Standards Professionalism and Prevention Lead	Strategic aim 7: Increasing focus on fostering professionalism
	Develop resources for unrepresented registrants (to commence Q3 21/22)	Head of FTP	
	Complete internal research into the outcomes of unrepresented registrants' cases and the reasons for this (2022/23)	Insight and Intelligence Lead	
	Seek regulatory reforms which allow us to better adapt our processes to the registrant (timescales subject to Government, ongoing)	SMT	
Create online guidance for registrants on our key regulatory functions	Review existing web content on our processes and where we can improve content in the short term (Q1 20/22)	Digital Communications Team Head of FTP	Strategic aim 7: Increasing focus on fostering professionalism

	Create a package of content we can share with all registrants subject to an FTP referral. To include information on evidence statements, how we prepare allegations and why they might change during the FTP process. Also, to establish if wider need for other processes, such as CPD. Aim to deliver this in an interactive and engaging way. (2022/23)	Head of Registration Head of FTP Head of Registration	
Develop specific team capabilities to manage vulnerable registrant cases	Review current provision of training across regulatory departments and the process when a vulnerable registrant is identified, with mental health experts (2022/23)	Head of FTP Head of Registration Head of HR	Strategic Aim 2: Leading with fairness and advocating equality, diversity and inclusion
	Working with mental health experts, develop employees to better equip them to handle vulnerable registrants (2023/24)		
	Regulatory reform to progress to allow for greater flexibility (timescales subject to Government, ongoing)	SMT	
Establish a registrant helpline to give individual, confidential advice	Continue to progress the lay advocacy service with the NMC, currently in the recruitment phase (2021/22, subject to other regulator's timescales)	Head of FTP	Strategic Aim 2: Leading with fairness and advocating equality, diversity and inclusion
	Reflect on learning from the lay advocacy service and consider options for a dedicated registrant advice line. Engage mental health experts in the delivery of a support line. (2022/23)	Head of FTP Head of Registration Head of Policy and Standards	
	Establish a support line (2023/24)		
Explore possible Peer Support Scheme (initially for registrant's going	Engage professional bodies and trade unions about the findings and possible ways of taking this forward (initial contact to commence Q1 21/22)	Head of Policy and Standards	Strategic aim 7: Increasing focus on

through FTP) to ensure registrants access learning through our processes	Formally commence exploration of peer support options (Q4 21/22)		fostering professionalism
	Roll out of peer support scheme for registrant's going through FTP (2022/23)	Head of Policy and Standards Head of FTP	
	Consider extension of scheme to registrants going through our Registration processes (with a focus on CPD, International applications, renewals) (2023/24)	Head of Policy and Standards Head of Registration	
Continue to deliver resources that support our registrant's learning and professionalism	<p>Full actions and timescales relating to this action are set out in the Professionalism and Prevention Framework⁶. This includes the development of a:</p> <ul style="list-style-type: none"> • Professional Liaison Service • Support service for employers • Professionalism toolkit • Supervision toolkit • Learning materials for students • Learning tools for education providers 	<p>Overarching responsibility by the Professionalism and Upstream Regulation Lead. Individual action owners set out in the Framework.</p>	Strategic aim 7: Increasing focus on fostering professionalism

⁶ <https://www.hcpc-uk.org/globalassets/meetings-attachments3/education-and-training-committee/2020/8.12.11.2020/enc-03---professionalism-and-prevention-framework.pdf>

Equality, Diversity and Inclusion Impact Assessment (EIA)

Section 1: Project overview

Project title: Registrant Health and Wellbeing Strategy and Action Plan	
Name of assessor: Olivia Bird	Date EIA agreed: TBC

What are the intended outcomes of this work?

- The Strategy and Action plan set out how we will achieve our vision to ‘exhibit empathy in all our interactions, demonstrate fairness in all that we do, and cultivate professionalism through a supportive, transparent and collaborative approach.’
- This impact assessment provides an initial overview of the likely impacts of this work, but we will be following up with more detail on the impacts of specific actions as this work progresses.

Who will be affected?

The primary target of this work is registrants. The actions outlined in this work should improve their experience of HCPC and reduce the impact of our processes on their health and wellbeing.

Whilst registrants are our primary target, other stakeholders may also be impacted by this work. This includes:

- Students / Applicants – Actions relating to how we communicate with registrants across our processes will also improve students and applicant’s experiences of HCPC (through improvements to how we engage these groups in our registration processes and through our Professionalism and Prevention work).
- Education and training providers – Actions relating to Professionalism and Prevention are also targeted at education and training providers and should improve their understanding of HCPC and our processes.
- Employers – Actions relating to how we work with educators to improve their understanding of HCPC and the FTP referrals process should improve will impact employers. Many employers are also registrants performing manager roles, so they will benefit from these changes in both their capacity as an employer and as a registrant.
- HCPC employees – Employees will be affected as the actions set out in this work directly impact on their roles and how they perform these. Employees will be engaged throughout the process and receive targeted training on the actions set out in these papers, to ensure they are equipped to drive forward these improvements.
- Members of the public – Whilst not the focus of this work, actions relating to this work may indirectly impact members of the public or be used in the future to drive forward similar projects targeted at our engagement with members of the public / service users. Improved communications about what HCPC does and how our processes work will be of use to the public / service users, as will changes to our communications and templates in the tone of voice review and how we engage key stakeholders such as employers in our processes.

Section 2: Evidence and Engagement

Lack of data should not prevent a thorough EIA. Be proactive in seeking the information you need.

What evidence have you considered towards this impact assessment?

We have limited EDI data about individuals on the Register, through our recently completed diversity data report. Across the life of this project, we hope to improve our EDI data capabilities. This will be fed into future iterations of the EQIA.

How have you engaged stakeholders in gathering or analysing this evidence?

We have not engaged stakeholders at this stage. Stakeholder engagement is however a key part of the project and associated actions, so the EDI impacts of the implementation of this work will be considered at all stages.

Section 3: Analysis by equality group

The Equality and Human Rights Commission offers information on the [protected characteristics](#).

Describe any impact to groups or individuals with the protected characteristics listed below that might result from the proposed project. Draw upon evidence where relevant.

For all characteristics, consider **discrimination, victimisation, harassment and equality of opportunity** as well as issues highlighted in the guidance text.

Age (includes children, young people and older people)

Younger registrants are more likely to be on lower wages, with less financial security, due to the stage of their career. This means our Fitness to Practise and Registration processes may have a more negative impact on these groups than older / more financially secure registrants. They may also be less likely to be a member of a professional body, due to the cost involved, or have access to legal representation. The action plan outlines our intention to create resources for unrepresented registrants. We also want to improve registrant's access to support services, and ensure this is not limited only to members of professional bodies. These measures should mitigate negative impacts on these groups.

Many of the actions in this work require us to produce online information. In general, younger people will have greater access to digital resources and better digital skills. We will need to keep this in mind when producing content, to ensure it is accessible for all groups and does not negatively impact one group over another.

Disability (includes physical and mental health conditions. Remember 'invisible disabilities')

Initial diversity data indicates 13% of surveyed registrants were disabled. This compares to a benchmark of 4%. We do not have corresponding data about FTP cases, to confirm if this group is more or less likely to go through this process.

However, a mental health condition can be considered a disability, so the strains of our processes on registrant's mental health could result in an increased percentage of registrants going through these processes with a disability. We also require registrants to declare to us a health condition when it is affecting their fitness to practise, which means we are likely to see a higher percentage of registrants with disabilities through these processes than elsewhere.

Our planned support services for registrants and improvements in how we identify the state of our registrant's mental health should result in positive impacts for these groups. It will be important that we work with mental health experts throughout this process and embed reasonable adjustments into our processes / templates, to ensure this positive impact is felt.

Gender reassignment (consider that individuals at different stages of transition may have different needs)

We are unclear of the current impact of our processes on this group and require further EDI data on our Register to establish if this group are more or less likely to be subject to these processes.

We will also need to ensure that our review of templates is gender neutral, with established processes in place across our regulatory functions to ensure that we work with registrants to understand their communication preferences and do not cause unduly distress by mis-gendering registrants or using inaccessible language. By embedding this into the Tone of Voice review, as part of our intention to improve accessible, this group should see a positive impact.

Marriage and civil partnerships (includes same-sex unions)

We do not anticipate an impact, positive or negative, on this work.

We are however unclear of the current impact of our processes on this group and require further EDI data on our Register to establish if this group are more or less likely to be subject to these.

Pregnancy and maternity (includes people who are pregnant, expecting a baby, up to 26 weeks post-natal or are breastfeeding)

We do not anticipate an impact, positive or negative, on this work.

We are however unclear of the current impact of our processes on this group and require further EDI data on our Register to establish if this group are more or less likely to be subject to these.

Race (includes nationality, citizenship, ethnic or national origins)

The EDI data we hold shows 88% of surveyed registrants were white and only 11% BAME. The percentage of white registrants was slightly higher than the benchmark.

We do not yet have data on our FTP processes, to see if BAME registrants are more likely to be subject to a FTP concern. However, we know from other regulators (the GMC and NMC) that people from BAME backgrounds are more likely to have a FTP concern raised about them.

BAME groups are also considered to be at high risk of mental health problems.¹

We expect to see a positive impact on this group due to the mental health support we intend to deliver. We will however need to keep the above data in mind when developing support services and establish a more comprehensive understanding of challenges faced by certain groups in relation to mental health to ensure this support is accessible to all.

Religion or belief (includes religious and philosophical beliefs, including lack of belief)

We do not anticipate an impact, positive or negative, on this work.

We are however unclear of the current impact of our processes on this group and require further EDI data on our Register to establish if this group are more or less likely to be subject to these.

Sex (includes men and women)

We are aware that there is a gender imbalance on the Register – 75% of the Register are women. This means registrants subject to our regulatory processes will mostly be female.

Despite this, men are over-represented in FTP. This means there are more likely to experience the negative impacts of our processes.

¹ <https://www.gov.uk/government/publications/better-mental-health-jsna-toolkit/3-understanding-people#population-demographics-and-vulnerable-groups>

We also know that the risk of suicide in men is a lot higher than women. In the UK in 2018, three quarters of suicides were among men. However, mental health conditions affect women more than men – one in five women compared to one in eight men.² This may be due to social barriers that prevent men seeking help and a diagnosis.

We expect to see a positive impact on this group due to the mental health support we intend to deliver. We will however need to keep the above data in mind when developing support services, and establish a more comprehensive understanding of any barriers that might be in place preventing registrants of any gender to seek help for their mental health.

Sexual orientation (includes heterosexual, lesbian, gay, bi-sexual, queer and other orientations)

We do not anticipate an impact, positive or negative, on this work.

We are however unclear of the current impact of our processes on this group and require further EDI data on our Register to establish if this group are more or less likely to be subject to these.

Other identified groups

Registrants from lower socio-economic groups are more likely to be worse affected by our processes and the costs involved. They are less likely to have legal representation and are more affected by fees or any disruption to their income. They may also not be a member of a professional body, due to the cost of their fees.

Our work to improve support for unrepresented registrants, and to ensure support services are available to all registrants, should therefore lead to positive impacts for this group.

Four countries diversity

The Registrant Health and Wellbeing Action Plan and Strategy will progress jointly with stakeholders from all four countries. We will use our EDI data to understand the unique make up of registrant populations across the four countries, and potentially adapt our approach accordingly. In addition, where we take forward engagement / activities with one country (for example our recent MOU with Scottish Government), we will also promote this with equivalent bodies in the other countries to ensure we are promoting equal opportunity. This will be a particular focus with our lobbying to improve access to mental health services for our registrants.

There is a need for us to provide Welsh language communications, detailed below.

There are some variances in the definition of allied health professional (AHP) across our professions. ODPs, for example, are not AHPs in Scotland. Therefore, some professions may not have access to certain resources that are being made available to AHPs. We will keep this in mind in all our engagement with the four countries and take care to promote all professions on the Register and their needs. This should limit any negative impact on these professions by being excluded from the definition of AHP.

Section 4: Welsh Language Scheme

How might this project engage our commitments under the Welsh Language Scheme?

This project will require us to engage stakeholders and publish new information on the website.

² <https://www.mentalhealth.org.uk/statistics/mental-health-statistics-men-and-women>

Any information published that is targeted at registrants would be technical or specialised material aimed at professionals (see para 4.2 of the Scheme) for the purpose of the Welsh Language Scheme (WLS)³. We therefore do not need to translate these materials, but could provide a translation on request.

However, information for members of the public would require a translation (see para 3.8). Due to the need to minimise translation costs, we will only translate content when it is finalised / unlikely to be amended – web content is changing all the time as the situation develops.

Public meetings also need to be advertised and delivered in both English and Wales when hosted in Wales (para 3.12 – 3.15 of the Scheme). This might therefore impact how we deliver certain stakeholder engagement in the future, and something the relevant teams will need to consider.

The HCPC's Welsh Language Scheme is currently under review, as we await new Welsh Language Standards from the Welsh Language Commissioner. We will therefore need to re-assess our impact on Welsh when these standards are introduced.

Section 5: Summary of Analysis

What is the overall impact of this work?

We expect to see positive impacts across most groups, including age, disability, gender reassignment, race, sex, lower socioeconomic groups, and four country diversity.

To avoid negative impacts, we will need to engage experts and continually reflect on the accessibility of our approach as this work progresses.

Section 6: Action plan

Summarise the key actions required to improve the project plan based on any gaps, challenges and opportunities you have identified through this assessment.

Include information about how you will monitor any impact on equality, diversity and inclusion.

Summary of action plan

At this stage we have not produced a detailed action plan attached to this EQIA, but instead propose to produce more detailed impact assessments relevant to specific actions. This will also give us time to reflect on improved EDI data on the Register, after our next registrant survey.

A summary of what we plan to do next is set out below:

- Ensure communications are accessible to all, with a particular focus in the Tone of Voice review and stakeholder engagement
- Investigate further the potential barriers to accessing support across all protected characteristics so we can learn from this in the delivery of our own support services
- Engage stakeholders on an equal footing, and be transparent about these discussions with others to ensure equal opportunity
- Reflect on new EDI data as / when receive and adjust our approach accordingly

³ <https://www.hcpc-uk.org/globalassets/about-us/governance/welsh-language-scheme.pdf>

- Produce more detailed EQIAs as actions are taken forward

Below, explain how the action plan you have formed meets our public sector equality duty.

How will the project eliminate discrimination, harassment and victimisation?

The action we will take forward in this Project aim to reduce the negative impact of our processes on certain groups and our registrant's mental health. These measures should therefore help eliminate discrimination, harassment and victimisation in these processes.

How will the project advance equality of opportunity?

The action we will take forward in this Project aim to reduce the negative impact of our processes on certain groups and our registrant's mental health. These measures should therefore help advance equality of opportunity in these processes.

How will the project promote good relations between groups?

The action we will take forward in this Project aim to reduce the negative impact of our processes on certain groups and our registrant's mental health. These measures should therefore help promote good relations between groups in these processes.

Appendix 2: How to complete this form

This form is intended for use in **new or major** projects or policies. It is structured to consider the 9 protected characteristics set out in the Equality Act 2010. It is therefore important that you complete every section of the form.

You should consider and document **positive and negative** impacts which might result from the proposed project. Impacts might be **indirect**. If you consider that there will be **no impact** to groups or individuals with a particular protected characteristic, this **should still be documented**.

The equality impact assessment is not intended as a 'tick box' exercise. Instead, it offers a tool to help you embed equality, diversity and inclusion throughout your work planning and delivery. We encourage you to consult with colleagues, stakeholders and where possible, people with protected characteristics throughout this process.

For more guidance and information, please refer to the **Equality impact assessment guidance** document.

Should you have any queries or suggestions, please contact the Policy and Standards team on 0207 840 9815 or policy@hcpc-uk.org. Your EDI Manager is Katherine Timms.