
Equality, Diversity and Inclusion update

Executive Summary

This paper is to provide the Council with:

- The latest iteration of the draft EDI Strategy 2021-2026
- The final update on progress against the EDI Action Plan 2019-2020

This content has been prepared and agreed by the EDI Steering Group, comprising heads of section and department leads from each function of the organisation, chaired by the Executive Director of Policy and External Relations. Employees, Council members and HCPC EDI Forum members have all been given the opportunity to input into the content.

Previous consideration	The last update on our progress on EDI was at the September Council meeting where Council members provided feedback on the key themes, draft vision and strategic aims of the draft EDI Strategy 2021-2026.
Decision	The Council is asked to <ul style="list-style-type: none">• review and provide comment on the paper to inform the next iteration of the draft EDI Strategy• approve the publication of the report on progress of the EDI action plan 2019-20
Next steps	The Executive will undertake targeted consultation with the professional bodies in early 2021 on the current drafts shortly after which the final versions will be published/launched.
Strategic priority	The strategic priorities set in 2018 are no longer current.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	These have been factored in the workplans and budgets.
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Background to EDI Strategy 2021-2026 development

1 Introduction

- 1.1 Council approved the plan to develop our first Equality, Diversity and Inclusion (EDI) Strategy at its July meeting, as part of a wider suite of reforms to strengthen our organisational approach, governance and accountability structures to take forward the EDI agenda.
- 1.2 The work we're doing is not reactive to events this year – but those events, and the elevation of the voices of our people, have generated the momentum needed to galvanise action – to make sure we take bolder action and make firmer commitments to change. By publishing our EDI Strategy externally, we seek to be transparent about our challenges, hold ourselves accountable for progress, and set an example to the individuals we regulate.
- 1.3 Our main reasons for developing an EDI Strategy are as follows:
- To send a clear message of the importance of EDI for the HCPC
 - To strengthen our approach across our stakeholder groups (registrants, Service users, staff, partners) to be more ambitious, joined-up/consistent
 - To better understand where issues in fairness and equality arise and swiftly drive forward tangible action and change
 - To become more proactive, forward thinking, strategic and ambitious, with longer term goals (beyond the year ahead)
 - To enable a shared understanding of where we want to go/what we want to achieve
 - To promote awareness of our EDI ambitions and gain buy-in and collaboration with others
 - To enhance our transparency and accountability for delivery.
- 1.4 By publishing this first phase of our commitment to change, we will be holding ourselves to account on behalf of the service users we protect and the professions we regulate. We do not underestimate the importance of our role as a regulator in supporting wider societal change.

2 Stakeholder engagement and feedback

- 2.1 The HCPC EDI Forum (with 70+ members: both HCPC registrants and key stakeholders) discussed and provided feedback on the draft vision and strategic aims at their first meeting on 14 September and will review the current content again at its next meeting on 09 December 2020.
- 2.2 The EDI Steering Group (with heads of function) met and inputted into the draft vision and strategic aims at its meeting on three occasions in October-November 2020.

- 2.3 Council discussed/inputs into a survey covering the draft vision and strategic aims in September 2020, shortly after employees were asked to provide feedback on the same. The Senior Management Team discussed progress to date at its meeting on 24 November and provided steer for next steps.
- 2.4 The engagement to date has been helpful, and the EDI Steering Group have identified a need for further engagement on the draft EDI Strategy to better understand the tangible actions that our stakeholders would like us to undertake to achieve the Strategic Aims. Additionally, the underpinning/ detailed Action Plan 2021-2023 requires further input by the EDI Steering Group before publication alongside the Strategy.
- 2.5 We will, therefore, undertake targeted consultation in early 2021, particularly with the professional bodies and key stakeholders, before bringing a final version to Council for its approval at its March 2021 meeting.

3 Risk

- 3.1 There has been limited resource within the Policy and Standards Team to progress with coordinating and supporting the EDI Steering Group with the development of this content and to undertake consultation/engagement (in addition to other competing EDI priorities, including engaging the professional bodies in preparation for the next diversity data collection survey). This is largely because the recently appointed EDI Policy Manager (dedicated resource to support this work) leaving the organisation after two weeks of employment in October/November.
- 3.2 Given the risk/priority associated with this area of our work, we have progressed with the presentation of the content developed to date, but further engagement with key stakeholders is necessary before final approval by Council and publication is feasible.
- 3.3 In the meantime, we are progressing with the second round of recruitment of the next EDI Policy Manager role, with interviews taking place on 25 November 2020. Additionally, the new HR EDI and communications officer will start within the HR Department imminently. These roles will support progress with the Strategy and Action Plan.

Foreword

As the regulator for 15 different professions¹, our work has an impact on, and makes a difference to, millions of people across the UK. We value their diversity and our own values and practices must be inclusive, and our organisation diverse, if we are to properly understand and meet their needs.

This Strategy builds upon what we have already accomplished and confirms our commitment to be a leader in equality, diversity and inclusion (EDI). It supports our commitment in our Corporate Strategy 2021-26 to promote positive and inclusive professional working environments for our stakeholders. It will ensure that our policies and processes are fair and accessible to all, and that our people feel confident to speak out when they see bias or discrimination, and to ask questions and challenge in a way that encourages conversation and supports positive change. Our staff, Council, registrants and other stakeholders have contributed to the development of our EDI vision and this strategy. We are grateful for the knowledge, insights, passion and real experiences that they have brought.

We have set ourselves the ambitious challenge of becoming recognised as an actively anti-discriminatory organisation that upholds and promotes best practice in EDI and as active allies for change; underpinned by a comprehensive set of strategic aims to guide us. We believe with strong leadership we are on track to meeting this ambition, starting now and over the long-term, recognising the extent of the transformation we want to achieve and ensuring the impact of our actions is sustainable.

This will require a concerted and collaborative effort amongst all HCPC employees and partners. This Strategy alone will not be enough - the ownership, accountability and leadership of all of us in its delivery is imperative if we are to achieve our commitments.

Alongside this Strategy, we will publish our EDI Action Plan 2021-2023 detailing our committed actions to support the delivery of the Strategic Aims in the short to medium term. We will first report on progress against those actions to our Council in December 2021, and again in December 2022 we will provide the final update and set out our new plan for the remainder of the Strategy period (until the end of 2026).

In the meantime, we look forward to working with and getting feedback from our HCPC EDI Forum on a quarterly basis - who we are sure will provide effective scrutiny and support to improve, and most importantly – ensure we keep on track for delivery.

¹ For information on who we regulate, please see our webpage here: <https://www.hcpc-uk.org/about-us/who-we-regulate/>

Summary

Vision

To be recognised as an actively anti-discriminatory organisation that upholds and promotes best practice in equality, diversity and inclusion and as active allies for change.

Strategic aims

We will achieve this vision by taking forward these seven strategic aims:

1. Proactively seek opportunities to exceed our legal obligations to eliminate discrimination, harassment and victimisation and ensure equity of opportunity for our registrants, their service users, our colleagues and partners.
2. Significantly improve the quality of our data and insights to inform our understanding and knowledge of the diversity and experiences of our registrants, their service users, our colleagues and partners, so that we can identify and address how they are impacted by our policies, processes and decisions.
3. Ensure our decision-making, within all our regulatory processes, is free from bias and discrimination and that everyone who has contact with us feels valued and respected.
4. Ensure that our registrants, their service users, our colleagues and partners feel equipped and confident to, and do, speak out when they see bias or discrimination, and to ask questions and challenge in a way that encourages constructive conversation and supports positive change.
5. Influence inclusive cultures and diversity amongst our registrants and within the institutions that employ them, and those that educate and train our future registrants.

Internally, as an organisation, we will:

6. Continue to ensure, promote and harness the rich diversity of our colleagues and partners, ensuring a diverse workforce and representation at all levels.
7. Develop and embed an inclusive culture, that encourages and values diversity and the uniqueness and experiences of our colleagues and partners, enabling them to be themselves and bring their whole self to work.

What success will look like

Success will deliver the following outcomes

- Our stakeholders are assured that we are doing all that we can as an organisation to eliminate discrimination, harassment and victimisation and advance equity of opportunity for our registrants and colleagues.
- We can evidence that our data informs our policies, processes and decisions, and our stakeholders report the positive impacts.
- Our people feel confident in speaking out when they see discrimination or bias.
- We publish contemporaneous and detailed information about the EDI data we hold and the action we are taking across all our functions.
- Our regulatory decision making is fair and free from bias
- We actively listen, learn and are transparent about our EDI challenges, hold ourselves accountable for progress, and set an example to all of our stakeholders

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

The two main sources of intelligence that have informed the contents of this Strategy are:

- The [HCPC EDI Forum](#) with 70+ members (individual registrants and key stakeholder organisations, including the professional bodies), which first met on 14 September 2020, and quarterly since.
- Our first [diversity data report](#), with independent analyses of our diversity data sets (our registrants, employees and partners) by Cardiff Metropolitan University.

This intelligence has demonstrated that we need to focus on the following in this Strategy:

- Our data collection and analyses to increase our transparency, accountability and capability
- Our responsibility, role and influence beyond the traditional scope of professional regulation; to promote positive EDI change across the health and care systems of the UK and throughout our registrant's career pathway (starting with potential students)
- Our diversity and inclusivity at all levels and across all functions

Strategic aims

Strategic Aim 1: Proactively seek opportunities to exceed our legal obligations to eliminate discrimination, harassment and victimisation and ensure equity of opportunity for our registrants, their service users, our colleagues and partners.

Where we are now

We recognise that we have traditionally been operating at the level required in order to meet our legal and regulatory duties in relation to equality, diversity and inclusion, ((EDI) (including the Public Sector Equality Duty). And that, in our view, is no longer sufficient. We are committed to completely transforming our approach over the next five years, so that we are in a position to proactively exceed these duties/legal obligations.

By this we mean aiming for best practice in EDI and being an effective leader and role model to others, rather than simply ensuring we meet the minimum standards required. This will require continual research and engagement to ensure that we keep up to date with emerging best practice, informed by the views of our stakeholders, and require us to benchmark ourselves against those who have a strong reputation in EDI.

What we will do:

- Develop and deliver workshops that welcome international registrants, support their integration into the UK health and care systems and ability to meet HCPC standards.
- Develop a dedicated EDI webpage(s) with improved content on our approach to EDI and resources (including links to videos and blogs)
- Represent the diversity of our registrants, partners and employees in our content, which raises awareness, informs and educates on EDI issues.
- Gather EDI data for graduates entering HCPC register to understand profile of new entrants to workforce pool. Triangulate with HESA data on attrition and attainment to inform understanding of differences across professions / training models. Use evidence to influence wider sector on trends we see in registrant pool and discuss themes with relevant providers in context of EDI standards within the Standards for Education and Training.
- Ensure that decision makers are supported to understand whistleblowing and how to take it into account in their decisions. And that registrants understand how and when to raise whistleblowing concerns with us.
- Review standards and guidance for education and training and for registrants to ensure that registrants, students and educators are:

- equipped and confident to, and do, speak out when they see bias or discrimination, and to ask questions and challenge in a way that encourages constructive conversation and supports positive change.
- influenced to embed inclusive cultures and diversity amongst our registrants and within the institutions that employ them, and those that educate and train our future registrants.

Strategic Aim 2: Significantly improve the quality of our data and insights to inform our understanding and knowledge of the diversity and experiences of our registrants, their service users, our colleagues and partners, so that we can identify and address how they are impacted by our policies, processes and decisions.

Where we are now

Overall, we need to boost the quality and volume of our stakeholder diversity data and analyses, in order to gain a better understanding of our registrants and other key stakeholder's diversity profile; and to identify the impact of our processes on our registrants and take action to address any potential discrimination, harassment, and/or unconscious/conscious bias. In 2019/2020 we hold diversity data for only 5.9% of the HCPC registrants.

Whilst we have undertaken analyses of the data we hold, it is important for us to gain a more robust picture of our registrants before we are able to undertake further, more meaningful analysis about the impact our regulatory approach has on our registrants in relation to their EDI characteristics and also to understand how the demographics are evolving over time.

Collection of better diversity data will enable us to better understand the issues that our registrants face, and identify the interventions that can be put in place to support them better. It will help us make sure that our stakeholders are able to interact with the HCPC free from discrimination, harassment and victimisation. We can also develop a better understanding of how different groups are affected by our processes. Without enough responses, we will not be able to do this.

This data set is unique and has the potential to be very beneficial (not just for the HCPC) – it will provide the most comprehensive profile of HCPC registered Allied Health Professionals, scientists and psychologists, in all four countries of the UK, and in relation to those working in NHS and non-NHS settings. Therefore, the benefit of having this data will be shared across the health and care systems of the UK and may support future efforts towards achieving a more diverse health and care workforce.

What we will do:

- Use learning from qualitative research to better understand the experiences of our registrants in relation to their EDI profile and FTP referrals (to be published in June 2021), and seek to address this through engagement and education with employers.
- Build a better understanding of the concerns that registrants from non-UK registration route are not treated equally and seek to address this through engagement and education with employers.
- Collect registrant diversity data at the point of initial registration and renewal. We will collect and analyse diversity data for 90% of registrants and other key stakeholders (eg parties to fitness to practise complaints and consultation respondents) by 2026, including comparative analysis with our registration, education and fitness to practise data. We will identify and understand the issues that our registrants face, and implement the interventions that can be put in place to support them.
- Gather diversity data for graduates entering HCPC register to understand profile of new entrants to workforce pool. Triangulate with HESA data on attrition and attainment to inform understanding of differences across professions / training models. Use evidence to influence wider sector on trends we see in registrant pool and discuss themes with relevant providers in context of EDI standards within the Standards for Education and Training.
- Explore and develop mechanism to capture diversity data for parties involved in fitness to practise processes.
- Undertake qualitative research to better understand the experiences of our registrants in relation to their EDI profile and use the case classification system to better understand the subject and patterns of FTP referrals.

Strategic Aim 3: Ensure our decision-making, within all our regulatory processes, is free from bias and discrimination and that everyone who has contact with us feels valued and respected.

Where we are now

Whilst we have done what we can with the data we hold, currently, we do not have the right data to appropriately evidence that our regulatory processes are free from bias and discrimination; or to demonstrate that those who come into contact with us feel valued and respected. We have enough feedback from stakeholders and learning from the experience of other comparable organisations to know that this is an area that requires improvement.

What we will do:

- Ensure our quality assurance function has appropriate oversight over equality impact assessments, to ensure these are embedded in everything we do.
- Ensure complaint root cause analysis takes account of equality, diversity and inclusion.
- Ensure that decision makers are supported to understand whistleblowing and how to take it into account in their decisions. And that registrants understand how and when to raise whistleblowing concerns with us.
- Undertake qualitative research to better understand the experiences of our registrants in relation to their EDI profile and use the case classification system to better understand the subject and patterns of FTP referrals.
- Build a better understanding of the concerns that registrants from non-UK registration route are not treated equally and seek to address this through engagement and education with employers.
- Explore and develop mechanism to capture diversity data for parties involved in fitness to practise processes.
- Conduct the Tone of Voice review, as part of the health and wellbeing project, to include a review of/change in language to ensure it is inclusive and accessible.
- Use learning from qualitative research to better understand the experiences of our registrants in relation to their EDI profile and FTP referrals (to be published in June 2021), and seek to address this through engagement and education with employers.
- Review the FTP panellist EDI training and develop further training or focused training depending on the outcome of the review.

Strategic Aim 4: Ensure that our registrants, their service users, our colleagues and partners feel equipped and confident to, and do, speak out when they see bias or discrimination, and to ask questions and challenge in a way that encourages constructive conversation and supports positive change.

Where we are now

Traditionally, this has not been a core area of focus in our standards for registrants and education providers (albeit it with some basic EDI competencies in existing standards/guidance) but we have already begun to lay the foundations to achieve this aim in our reviews of our standards.

We are currently reviewing [the Standards of proficiency](#) for all 15 of the professions on the Register (currently analysing the responses to the public consultation which recently closed). These are the standards that we consider necessary for the safe and effective practice of each of the professions we regulate. They describe what professions must know, understand and be able to do at the time they apply to join

the Register. One of the key areas of change in the standards being consulted on, is around the role of equality, diversity, and inclusion in the standards; specifically the importance of making sure that practice is inclusive for all service users.

What we will do:

During the five-year strategy there will be several, planned reviews of our standards and we will continue to embed these EDI principles within them, including our review of our:

- Guidance on Health and Character,
- Guidance on Conduct and Ethics for Students,
- Standards of Education and Training for Operating Department Practitioners,
- Process/guidance for Returners to Practice,
- Standards of Conduct Performance and Ethics, and
- Completion of the Standards of Proficiency review.

Strategic Aim 5: Influence inclusive cultures and diversity amongst our registrants and within the institutions that employ them, and those that educate and train our future registrants.

Where we are now

Currently, we do not have the right data to appropriately evidence the diversity of our registrants (as previously highlighted we currently hold diversity data for 5.9% of the HCPC registrants).

We are aware from insights and experiences from our HCPC EDI Forum members that they believe there is significant room for improvement in relation to embedding EDI principles throughout our registrants' career pathways, starting with prospective students, through to employment and progression to leadership; and that the HCPC has a core role in seeking to influence them through standards and other interventions, such as through our education quality assurance processes and through our professional liaison service engagement.

What we will do:

- Collect registrant diversity data at the point of initial registration and renewal. We will collect and analyse diversity data for 90% of registrants and other key stakeholders (eg parties to fitness to practise complaints and consultation respondents) by 2026, including comparative analysis with our registration, education and fitness to practise data. We will identify and understand the

issues that our registrants face, and implement the interventions that can be put in place to support them.

- Gather EDI data for graduates entering HCPC register to understand profile of new entrants to workforce pool. Triangulate with HESA data on attrition and attainment to inform understanding of differences across professions / training models. Use evidence to influence wider sector on trends we see in registrant pool and discuss themes with relevant providers in context of EDI standards within the SETs.
- Actively promote EDI celebration events and awareness days, and champion EDI causes.

Strategic Aim 6: Continue to ensure, promote and harness the rich diversity of our colleagues and partners, ensuring a diverse workforce and representation at all levels.

Where we are now

Given that we already undertake annual reporting of our staff and partner data to our Council (see our [HR Equality and Diversity Data for 2019](#) for example), there were no surprises for us in the [diversity data report](#) we commissioned in 2020. For example, we know that there is strong diversity amongst our staff population as a whole (51% Black, Asian and Other), but that the diversity drops in terms of black representation in more senior positions (manager level and above). The majority of managerial level staff were White (63%) compared to 43% of non-managerial level staff.

What we will do:

- Review the FTP panellist EDI training and develop further training or focused training depending on the outcome of the review
- A new EDI & Engagement Officer to be employed in the Human Resources Department, with a focus on employees and internal EDI opportunities and benefits.
- Recruit and establish an EDI Employee Forum, seeking their input and scrutiny of our organisational work on EDI.
- Appoint an external organisation to review the HCPC website/ recruitment adverts to assist in attraction and retention of applicants and employees for vacancies from all diverse backgrounds.
- Continue offering the Management Development Programme to Managers and Introduce a new training course for junior employees who wish to become managers.
- Ensure that our Council are diverse and receive regular training on equality, diversity and inclusion matters.

Strategic Aim 7: Develop and embed an inclusive culture, that encourages and values diversity and the uniqueness and experiences of our colleagues and partners, enabling them to be themselves and bring their whole self to work.

Where we are now

Currently we have a number of mechanisms in place to share EDI resources amongst employees, and to capture employee feedback and gain employee input into our EDI work, including:

- The Employee Forum
- The Microsoft Teams EDI Celebration Channel

We also have EDI training, reasonable adjustments training and unconscious bias training rolled out for employees, but we recognise there is room for improvement in ensuring that we regularly create and embed an inclusive culture as an employer and ensure that we and our colleagues feel valued and respected for our differences and uniqueness.

What we will do:

- A new EDI & Engagement Officer to be employed in the Human Resources Department, with a focus on employees and internal EDI opportunities and benefits.
- Recruit and establish an EDI Employee Forum, seeking their input and scrutiny of our organisational work on EDI.
- Review and identify areas of diversity missing within our existing internal communications content.
- Proactively work with relevant groups and people to fill gaps and explore ways to incentivise diverse participation in our materials, with targeted communications.

Appendix B

Final 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.	To be updated when PSA performance report 2019/20 published. 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: <ol style="list-style-type: none"> the level of EDI information held by the HCPC on the composition of the registrant base how the EDI information held about registrants is analysed and used the learning and training opportunities that are provided to HCPC staff in the area of equality, diversity and inclusion. This information is covered in the contents of this action plan.
	Legal advice sought if changes are made to EDI legislation that may impact our systems and processes.	Record of: <ul style="list-style-type: none"> legal advice received about changes in EDI legislation that may impact our systems and processes; and 	There has not been any EDI legislation in the action plan period. 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.

		<ul style="list-style-type: none"> any action taken as a consequence. 	
	Focus on EDI principles in the review of our Returning to practice guidance.	Record in equality impact assessments (EQIAs) that EDI considerations have been considered.	The Returning to Practice review has not progressed substantially since last updated. In the last update in July we said that this would be progressed with the appointment of a new Senior Policy Officer in August 2020, however they did not commence employment with us until Mid-September so this action is still outstanding. 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.
	Focus on the 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 considered by Council at this December meet. As part of this review, we have completed an Equality Impact Assessment (both with the consultation papers and will again for the 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.

Owner	Action(s)	Measure(s)	Progress update
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 August 2020 we commissioned external research to analyse the data, which was shared with Council in October and published on the EDI section of our website shortly after.
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.	<p>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.</p> <p>We have also considered potential EDI implications in invitation to tender documents and when appointing research teams, for example we are doing this for the EDI data research and service user engagement</p>

			<p>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"> • Translation of content on the COVID-19 hub for the public into Welsh; • Regular engagement with representatives from the four countries on our approach; • Exploring virtual telephony services; • Trialling virtual hearings on Teams; • Outgoing phone calls to vulnerable parties with support for staff making challenging calls remotely; • Gather feedback from registrants on approach; • Training in Registration team to recognise and support individuals that may need assistance; and • Home working survey.
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.	EDI was discussed at, and following, the June Employee Forum and it was decided in consultation with employees that an EDI specific forum/group should be established. The terms of reference for the proposed EDI Forum are currently being consulted on with the Employee Forum.

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	Record of analysis and any agreed action.	The annual reports on analyses of employee and partner EDI, recruitment and retention data were presented at Council's July and September meetings. The partner and employee data was also presented at TAC and in the external research commission report, alongside, and as a comparator, with the registrant survey data in the report to Council, also at this December meeting.

	necessary; and take associated action where identified.		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 being affected and to take action). This analyses formed part of the EDI report which was presented September Council meeting.
Executive Director of Policy and External 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 a content planner which includes 'awareness' days which includes a range of multicultural and ethnic events, for example Ramadan, Windrush Day as well as celebration days for different professions. We actively promote these events with our own content, and by engaging with external organisations on our social media channels. We also issued a statement on Black Lives Matter to express our support for our black and ethnic minority registrants, as well as our own employees and partners.</p>

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.	Content is available on the HCPC website in relation to: <ul style="list-style-type: none"> • our standards; • professional values; and • the role of EDI in education and training. 	In early November, we launched a new section of the website dedicated solely to EDI content, in the 'about us' section of the landing page. This new content includes a section on our EDI data, where the first diversity data report is published.

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

Owner	Action(s)	Measure(s)	Progress update
Head of Education	Focus on EDI principles in the review of the approach to quality assurance.	Record in equality impact assessments (EQIAs) that EDI	Decision to pilot new approach being made by ETC in June 2020. Pilot design and implementation will include assessment of EDI. Feedback

		considerations have been considered and addressed.	from stakeholders involved will also elicit any specific EDI issues / impacts. Pilots due to commence in January 2021. An EQIA was completed for initiation of pilot project. A further EQIA will be carried out and included in proposals to fully implement new QA model in September 2021.
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Communications and engagement

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

Owner	Action(s)	Measure(s)	Progress update
Director of HR & OD	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.	The Policy and Standards Team have established an HCPC EDI Forum with 70+ members comprising, our registrants, representatives of professional bodies and other key stakeholder organisations. The first meeting of the Forum was held on 14 September and the second, and final meeting of 2020 is being held on 9 December.

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

Owner	Action(s)	Measure(s)	Progress update
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 agreed to a guidance document for producing joint-regulator statements going forward. While we drafted a proposed joint-statement in relation to supporting registrants in dealing with racist abuse, this was not agreed by the other regulators. We therefore took the decision to consider the issues and principles as part of the Standards of Proficiency review.

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

Owner	Action(s)	Measure(s)	Progress update
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.	<p>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> <p>At this December Council meeting, the EQIAs for the health and character guidance review and the Standards of Education and Training 1 for Operating Department Practitioners will also be presented.</p> <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>
	Changes to the Standards of proficiency to reflect, value and respect diversity across the four countries.	Record of consideration of EDI issues in relation to unique national perspectives.	<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>To date, this has taken the form of providing updates to the Communications team so they can target engagement.</p> <p>Once the consultation closes on 30th October we will be able to provide final figures on the consultation responses. We will then undertake a detailed analysis of responses and where changes need to be made. Feedback on the EDI impact consultation question will also be used to inform a revised version of the Equality Impact Assessment. This will be presented to Council alongside our financial decision in March 2021.</p>

	Changes to our Returning to practice guidance to reflect, value and respect diversity across the four countries.	Record of consideration of EDI issues in relation to unique national perspectives.	The Returning to Practice review has not progressed substantially since last updated. In the last update in July we said that this would be progressed with the appointment of a new Senior Policy Officer in August 2020, however they did not commence employment with us until Mid-September so this action is still outstanding. 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. This will be taken to Council in Q1 21.
	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 at this December meeting. As part of this review, we will be completing an Equality Impact Assessment (both with the consultation papers and for the final decision) and ask stakeholders to provide EDI feedback as part of the consultation.

Effective and efficient organisation

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

Owner	Action(s)	Measure(s)	Progress update
Head of Governance	Training for Council members on reviewing, analysing and engaging in EQIAs.	Record of training date(s) and session outline.	Council members received this session facilitated by the EDI Policy Manager on 16 November.

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

Owner	Action(s)	Measure(s)	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.	As above under section 2.

Executive Director of Policy and External Communications	Intranet updates to be circulated quarterly in respect of EDI events and celebrations.	Record of regular intranet communications.	Internal communications continues to support in promoting the EDI strategy. In additional, internal communications has continued to use the EDI Teams channel to promote Black History Month and religious festivals such as Eid.
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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.

Owner	Action(s)	Measure(s)	Progress update
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 had the requisite resource/capacity to take forward this action in relation to equality impact assessment training.
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. EDI eLearning will be part of the corporate induction package for a new starters induction programme from September 2020. The completion rates are as follows: EDI training - Number of users 205/ completion rate 201 Unconscious bias - Number of users 88 (managers only)/ completion rate 77
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.
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. All sections of the EDI form are now mandatory. All forms are now 100% complete.
Head of Policy and Standards	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 received the first years' worth of data on the case classification framework in the Summer. This shows we received 24 cases where the subject of the allegation was discrimination. Due to limited capacity in the Policy and Standards team, further analysis of this data has not yet progressed. This will be taken forward as a key priority by the Insight and Intelligence lead once they join the organisation in December 2020.