

TAC, 15 September 2020

Equality, Diversity and Inclusion (EDI): Plans and progress update

### Executive summary

Appendix A describes the HCPC's plans for the development of our strategic approach, governance and accountability structures, and resourcing measures, to support the effective strengthening of our approach to EDI work going forward. This will align our approach with our ambition to be in a position where those we work with, and for, are confident that we are a fair, diverse and supportive, regulator and employer of choice. The appendix also provides detail on our efforts to collect, analyse and improve the EDI data we collect and use from registrants, employees and partners.

### Decision

TAC is invited to discuss and note the attached paper at Appendix A following the approval of the plans and progress at July Council.

### Background information

- The HCPC EDI Policy and Annual Action Plans can be found on our webpage [here](#).
- The most recent update on EDI to Council can be found in the July [council papers](#).
- A blog post on 31 July 2020 providing an update on our EDI plans can be found [here](#).

### Resource implications

There are currently no expected resource implications for this.

### Financial implications

There are currently no expected financial implications for this work.

### Appendices

- The EDI plans and progress update paper is attached at Appendix A.

### Date of paper

07 September 2020

TAC 15 September 2020

Appendix A: Plans and progress update on equality, diversity and inclusion (EDI)

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

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

The Senior Management Team have reviewed Employee Forum and external feedback and discussed and agreed several measures/changes to our approach in order to strengthen direction, ownership, accountability and governance in our EDI work. These plans were discussed and approved by Council at their July meeting. Some of those plans which will be of particular relevance to TAC are summarised below.

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

The EDI policy and action plans have served an important purpose in building a strong foundation upon which to build, but an EDI strategy for 5 years (starting in 2021) will support the HCPC's efforts in adopting more of a forward-thinking, strategic and joined up approach to its EDI ambitions. This is an approach that other regulators such as the GMC have taken<sup>1</sup>.

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

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

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

We have recently developed a mechanism for regularly engaging externally on EDI; ensuring that the EDI strategy, policy and action plans are informed by that engagement. This has included the recruitment for, and development of, a quarterly forum meeting of external EDI representatives (akin to the NMC's BME Forum and the GMC's BME Forum and Strategic EDI Forum) and individual registrants with an interest in our EDI work. To date we have collected details for more than 70 individuals that would like to be members of the Forum and have arranged the first meeting sessions on 14 September.

---

<sup>1</sup> <https://www.gmc-uk.org/about/how-we-work/equality-and-diversity>

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

In order to set the right tone/message about EDI being a priority area, a named senior executive team member will be appointed as a sponsor/organisational representative for EDI. The EDI representative will provide leadership on this agenda and use their seniority, gravitas and power to influence and affect change across the organisation. They will be responsible for overseeing the development of the EDI strategy and implementation of the existing EDI action plan process and providing leadership on the issues across the organisation. They will also be responsible for reporting to Council regularly on progress against annual action plans and partnered with the appointed Senior EDI representative from Council.

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

All of the measures/changes above will be supported by effective internal and external communications (for example, blogs, all employee meetings, registrant newsletters etc). We will further promote and publicise our EDI action plan and associated work streams as widely as possible, and there are a number of ways this can be done. Promoting them is key to implementing them effectively and will help us demonstrate that we have taken all reasonable steps to prevent and address discrimination.

### **EDI data and intelligence**

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

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

In December 2019 we launched our first annual, voluntary survey of our registrants to establish a stronger base of data on registrant EDI information. The responses to the survey mean we hold contemporaneous EDI data for 5% of the Register. We are commissioning an external research team to further assess the data, identify any gaps and provide expertise on analysing the data effectively to meet our aims. We hope to have appointed the research team by the end of July and expect to receive

their final report by mid-late September 2020. We plan to use the commissioned analyses to inform a report which the HCPC will draft and publish in late 2020/early 2021.

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

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

In the interim, while we develop our data and insight capability to meet our longer term aims, there are some 'quick wins' that can be achieved, such as the work the Digital Communications Manager is doing to develop the data & insight hub of the website by publishing monthly snapshots of the Register.

#### **External research**

While the response rate is not as high as we might have hoped, we still believe that some meaningful analyses can be achieved, and that is why we have commissioned an external research team to further assess the data, identify any gaps and provide expertise on analysing the data effectively to meet our aims. We expect to receive their final report by mid-late October 2020. We plan to use the commissioned analyses to inform a report which the HCPC will draft and publish in late 2020/early 2021.

#### **Plans for future (EDI data and intelligence)**

With greater quantity and quality of data comes a greater responsibility to utilise that data to analyse and report on trends in our registrants' education and practice, and to act on them when necessary and encourage others to do the same.

This EDI survey, (or other future mechanisms to collect EDI data), the analyses, reporting, and action planning, ought to be cyclical/not a one-off exercise. In future years (including this year, 2020), we should also collate data collected in each of the annual surveys to conduct data trend analysis, so that we are better able to understand how the profile of our registrants changes over time. This may enable more informed estimations about the potential impact of our regulatory functions on our registrants, with regards to their EDI characteristics, and any necessary adaptations as a result.

While there is a lot we can learn from substantial research and reviews done in other professions (such as 'Fair to Refer? Reducing disproportionality in fitness to practise

concerns reported to the GMC<sup>2</sup>), it will be important to understand the nuances, and gain evidence to prove that the same may be applicable in relation to the 15 professions that we regulate. We might expect, or make an educated guess, about the prevalence of disproportionate/unfair fitness to practise referrals/complaints and outcomes for black, minority and ethnic HCPC registrants for example, but that is not enough to satisfy our legal and moral duties as a public sector body. This will certainly require further quantitative analysis of the registrant survey data, and integration and comparison with our registration and FTP data sets, but it will also be highly likely that qualitative research will need to be undertaken to investigate registrants' experiences meaningfully.

### **Next steps**

We are currently engaging with employees, registrants and other key stakeholders to pull together some key themes arising from discussions, which can form the starting basis for the EDI strategy. This includes the first external EDI Forum sessions held on 14 September. The key themes will then be brought to the September Council meeting for feedback to be sought before further development of the strategy. A final draft of the EDI strategy will be brought to Council for final approval at its December meeting, before launching in 2021. Council will also receive the update on progress against the 2019-2020 action plan in December, and the outcome of the EDI data analyses. We will also be launching our targeted communications campaign with registrants to boost responses to the EDI data collection survey in late 2020.

---

<sup>2</sup> <https://www.gmc-uk.org/about/how-we-work/corporate-strategy-plans-and-impact/supporting-a-profession-under-pressure/making-sure-doctors-are-treated-fairly/read-the-report>