

Equality, diversity and inclusion (EDI) action plan

1. Performance

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

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|------------------------------|---|--|------------------|
| Head of Policy and Standards | EDI considerations present in all research outputs | 100% of research outputs to cover EDI issues. | 1, 2, 12 |
| | Appropriate engagement with the PSA to meet any new standards set with respect to EDI | Record of appropriate communications and reports to the PSA. | 1, 7 |
| | Legal advice sought if changes are made to EDI legislation that may impact our systems and processes. | Record of: <ul style="list-style-type: none"> • legal advice received about changes in EDI legislation that may impact our systems and processes; and • any action taken as a consequence. | 1, 2 |
| See actions 2.4 – 2.5 | | | |

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|---------------------|---|--|------------------|
| Director of HR & OD | Consideration given to EDI principles in the development and generation of all employee and partner policies. | 100% of new and updated employee and partner policies to take account of EDI principles. | 1, 3, 10 |

1.3. We will endeavour to improve the diversity of applicants and appointees to all HCPC roles.

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|---------------------|--|--|------------------|
| Director of HR & OD | Review and develop the language used in our recruitment materials to ensure that management and senior roles are attractive to women | Increased proportion of women in management and senior roles | 3 |
| | Maintain and promote our status as a Disability Confident Employer. | Disability confident status is maintained | 3 |
| Head of Governance | Review Council remuneration policies to improve accessibility of Council membership. | Record of Council remuneration review. | 3 |

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|------------------------------|--|---|------------------|
| Head of Policy and Standards | Revise the Standards for prescribing to include the EDI standards developed in the 2017 standards for education and training (the SETs). | Revised Standards for prescribing consulted published in 2019 (following consultation in 2018). | 5 |

2. Communications and engagement

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|------------------------|---|---|------------------|
| Head of Communications | Support all reasonable requests for information to be provided in accessible formats. | 100% of requests for information to be provided in accessible format assessed, and reasonable requests supported. | 1, 6 |

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|------------------------|--|------------|------------------|
| Head of Communications | Promote our Standards for conduct, performance and ethics (SCPE) and Standards for education and training (SETs) at relevant events, including their EDI requirements. | | 4 |

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

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|------------------------|--|---|------------------|
| Head of Communications | Accessibility considered for events. | Accessibility considered for 100% of events organised by the Events team. | 1, 6, 8 |
| | Four countries invitees and, where applicable, venues considered for events. | Four countries consideration for 100% of events organised by the Events team. | 1, 6, 8 |

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|------------------------------|---|--|------------------|
| Head of Policy and Standards | EDI question asked and evaluated in consultations, surveys and research projects. | 100% of consultations, surveys and research projects to cover EDI. | 1, 2, 6 |

| | | | |
|--|---|--|------|
| | Consideration of any special measures required to reach relevant equality groups in consultations, surveys and research projects. | Record in equality impact assessments (EQIAs) for relevant projects that stakeholder mapping and targeted communications have been considered. | 1, 6 |
|--|---|--|------|

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

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

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|------------------------------|---|------------|------------------|
| Head of Policy and Standards | Satisfactory performance as monitored by the annual report to the Welsh Government. | | 1, 8 |

3. Effective and efficient organisation

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|---|--|--|------------------|
| Head of Policy and Standards and Head of Governance | Review of structure and content requirements for Council and Committee submissions to support visibility of EDI issues | EDI considerations routinely included in Council and Committee submissions | 2, 9 |

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|------------------------------|--|---|------------------|
| Head of Policy and Standards | Project to review and improve quality and consistency of EQIAs across key departments. | Record of project outputs including updated and agreed EQIA processes across key departments. | 2, 6, 10 |
| | Training in equality impact analysis to be considered for relevant staff. | Record of research into and business case developed for equality impact analysis training. | 11 |
| | Develop a policy and targets for the completion of EQIAs | Policy agreed and published internally | 1, 10 |

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|-----------------------------|--|---|------------------|
| Head of Fitness to Practise | Guidance and support materials provided for witnesses, complainants and registrants. | Record of routes through which witnesses, complainants and registrants can access guidance and support materials. | 6, 10 |
| | Guidance and support materials provided for employees in how to support witnesses, complainants and registrants. | Record of guidance materials available to staff in how to support witnesses, complainants and registrants. | 6, 10 |

3.4. We will provide guidance to employees on making reasonable adjustments for customers and stakeholders, and provide regular training on this area.

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|------------------------------|---|--|------------------|
| Head of Policy and Standards | Guidance provided to employees, and regular training delivered. | <ul style="list-style-type: none"> • Reasonable adjustments learning provided every 2 years with at least 75% participation. • 100% participation for new employees. | 1, 6, 11 |

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|----------------------|---|---|------------------|
| Head of Registration | Implementation of the non-binary salutation Mx into registration systems and procedures. | | 6 |
| | Guidance provided to employees on supporting the registration needs of trans individuals. | Guidance completed and distributed by end of June 2019. | 1, 6, 11 |

3.6. We will engage employees regarding our EDI policies and practices through the Employee Forum.

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|---------------------|---|---|------------------|
| Director of HR & OD | EDI to be included in forthcoming Employee Forum agendas and discussions. | Record of EDI on the agenda and minutes for meetings of the Employee Forum. | 10 |

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|--------------------|---|---|------------------|
| Head of Governance | Training for Council members on reviewing and analysing EDI impact assessments. | Record of training date(s) and session outline. | 1, 2, 9 |
| | Review regular EDI training strategy for Council members. | Record of discussion of training needs, interests and planning for 2019/20. | 1, 2, 9 |

| | | | |
|------------------------|---|--|----|
| L&D manager | Regular EDI sessions and/or e-learning courses provided to employees. | <ul style="list-style-type: none"> • EDI learning provided every 2 years with at least 75% participation. • 100% participation for new employees | 11 |
| Partner and HR Manager | Regular EDI sessions and/or e-learning courses provided to partners. | <ul style="list-style-type: none"> • EDI learning provided every 2 years with at least 75% participation. • 100% participation for new partners. | 11 |

3.8. We will develop a schedule of internal communications to celebrate EDI events and circulate important updates relevant to our EDI policy and action plan.

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

4. Data, intelligence and research

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|---|---|---|------------------|
| Head of Policy and Standards and Head of Registration | Process for collecting equality and diversity data from registrants reviewed for efficacy and optimised where possible. | Evidence of process review and record of a business case for relevant changes to our Registration system. | 1, 12 |
| | Target response rate developed for registrant equality and diversity data. | Target response rate agreed for registrant equality and diversity data and reporting completed against this target. | 12 |

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|------------------------|--|--|------------------|
| Senior management team | Process for collecting equality and diversity data from those we interact with reviewed for efficacy and optimised where possible. | Evidence of process review and system changes made where relevant. | 12 |
| | Target response rates developed for equality and diversity data for different stakeholder groups. | Target response rates agreed for equality and diversity data for different stakeholder groups and reporting completed against these targets. | 12 |

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|---------------------|--|--|------------------|
| Director of HR & OD | Develop the range and depth of our diversity monitoring data for the recruitment and retention of employees and partners | Development of data for employee and partner recruitment and retention that will identify gaps and inform targeted action | 3, 12 |
| Director of HR & OD | Target response rates developed for equality and diversity data for applicants and employees. | Target response rates agreed for equality and diversity data for applicants and employees and reporting completed against this target. | 3, 12 |

4.4. We will review how we collect data about allegations in fitness to practice cases, in order to work towards more efficient analysis of cases that involve EDI issues such as discrimination.

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|---|--|--|------------------|
| Head of Policy and Standards Head of Fitness to Practise | Review current framework for classification of allegations in fitness to practice cases. | Revised framework for classification of allegations and associated guidance to be implemented in 2019. | 2, 12 |

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

| Owner | Action(s) | Measure(s) | EDI Objective(s) |
|------------------------------|---|------------|------------------|
| Head of Policy and Standards | Analysis of equality and diversity data undertaken and presented to Council annually. | | 1, 2, 9, 12 |