

**Health Professions Council
Council – 14th December 2006**

Equality and Diversity Project update

Executive Summary and Recommendations

Introduction

At its meeting on 14th September, the Executive was asked to provide a project update to the Council and in particular the five year timescale which had been proposed.

Progress

- The project team has recently undergone general Equality and Diversity and specific scheme preparation training.
- All staff briefings are scheduled for February/March, where we will provide all staff with an update and information on our work in relation to Equality and Diversity. We will also request volunteers for the internal Project reference group whose role it is to review all procedures within the organisation with regards to Equality and Diversity
- Scheme preparation – we have screened and reviewed procedures within the Fitness to Practise, International and Communications departments. All departments will have completed the screening of the processes and procedures by the end of January 2007. This will help the project group assess the level of work involved in the project. We have also prioritised the procedures within the three departments mentioned above according to their impact on the six groups and whether registrants, applicants, employees, complainants or the public are affected. Work continues in identifying action points within these departments and particularly within the fitness to practise department. The fitness to practise review will begin in 2007. Action points identified will be validated by an internal and then an external working group.
- We have written the ‘Towards an Equality and Diversity Scheme’, this is provided as an appendix to this document.
- IT requirements for the LISA and Fitness to Practise systems have been identified. We will begin the capture of demographic data in the fitness to practise area in 2007.

Rationale for time frame

At the last Council meeting, some of the discussion centred around the appropriateness of the time scale anticipated for the completion of the project and for the publication of HPC’s scheme.

The project team have reviewed a number of different schemes produced by regulators and service delivery organisations. Each scheme takes a different approach. Many schemes approach the specific duties under the legislation by explaining their statements of policy in each of the six areas and then explaining the steps they will

take to identify and screen their processes, assess possible adverse impact and publish action points,

A minority of schemes explain this, but go on to include information gathered by these exercises and to describe the action points identified as part of the process of producing the scheme.

In order for the scheme to be meaningful, the Executive proposes that the Council should take the latter approach. The scheme when published would include the action points, together with any information about their achievement, particularly those identified in the early stages of the project. The scheme would also include information about our arrangements for ongoing monitoring of our processes and the achievement of the action points, together with arrangements for publishing regular progress reports.

During the course of the project, the project team intends to publish regular information on the HPC website. This is described in the document "Towards an equality and diversity scheme". We will also provide the Council with a progress report approximately every six months.

On further review of the project and the work required, we have decided to move the review of the HR and Partner function to August 2007. We have taken this measure due to the work that is already ongoing within that function (particularly with regards to legislative developments).

Furthermore, partners work across three departments and are closely linked to the work of the Fitness to Practise department.

As the result of this, we have been able to reorganise work and now anticipate that the scheme will be published towards the end of 2010.

Decision

The Council is asked to discuss the attached paper

Background information

EMT and other managers undertook diversity training in September 2006. This training will be rolled out for all in Employees in 2007/2008. We are also planning training for Council Members and HPC Partners.

Since the last meeting of Council, the project team has reviewed the membership of the project team so as to ensure the most effective use of staff time and resources and to ensure the project was manageable. As HPC progresses through the project, relevant departments/individuals will be brought back into the project as and when required. The project team now consists of the following members of staff

Project Sponsor – Marc Seale
Project Lead – Kelly Johnson
Project Manager – Claire Phillips
Project Executive – Michael Guthrie and Yasmin Hussein

Fitness to Practise – Kelly Johnson
International Registrations – Mark Potter
Human Resources – Larissa Foster
Human Resources (Partners) – Yasmin Hussein
Communications – Jacqueline Ladds
Secretariat – Niamh O’Sullivan

Note Taker – Merle McKinley McNair

Resource implications

Please see the Council Paper of 12th September 2006. Further work on the FTP database will be undertaken by the IT team to capture the necessary demographic data.

Financial implications

Since the Council Meeting of 12th September 2006, the IT costs for changes to the LISA registration system to capture demographic data has been estimated. It is estimated that this will be approximately £44000.

We will also incur costs in convening an external working group and in obtaining necessary advice from our Equality and Diversity Consultant and legal advice as required.

Diversity training has also been planned for 2007/2008, however these costs will be incurred by the relevant departments

For further financial implications, please see the council paper of 12th September 2006

Appendices

Council Paper -12th September 2006
Council Statements of Policy approved in March 2006
Towards an Equality and Diversity Scheme

Date of paper

4th December 2006

Health Professions Council
12th September 2006

HPC's Equality and Diversity Scheme

Executive Summary and Recommendations

HPC is currently conducting a five-year project to create an Equality and Diversity scheme. To create the scheme all procedures will be assessed to ensure that HPC is positively promoting a diverse and inclusive society.

A pilot will be conducted in the Fitness to Practise Department to ensure the methodology proposed to create the scheme is sound. Following this, all remaining departments will be covered.

Introduction

In recent years Government policy has moved from legislating to ensure that public bodies (such as HPC) treat all people they impact equally, to legislating to ensure that public bodies positively promote a diverse and inclusive society.

This move has been evident in legislation such as the Race Relations (Amendment) Act 2000 and the Disability Discrimination Act 2005, which demand that public bodies meet the following duties:

Race Relations Act

- To eliminate unlawful racial discrimination
- To promote equality of opportunity
- To promote good relations between people of different racial groups

Disability Discrimination Act

- To promote equality of opportunity between disabled persons and other persons
- To eliminate discrimination that is unlawful under the Act
- To eliminate harassment of disabled persons that is related to their disabilities
- To promote positive attitudes towards disabled persons
- To encourage participation by disabled persons in public life
- To take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons

HPC is under no legal obligation to write an Equality and Diversity scheme under either of the above pieces of legislation in order to meet its duties. However, as a matter of best practice one will be produced.

In order to ensure that the HPC Equality and Diversity scheme will be thorough, comprehensive and meaningful, the creation of the scheme will be managed as a project. A project team has therefore been established and a project timeline has been drafted.

As a primary project task, the Equality and Diversity project team have defined the following format for the scheme, using the Race Relations Act as guidance:

- A statement (previously submitted to Council in March 2006) of HPC Equality and Diversity policy on each of the following:
 - o Disability
 - o Age
 - o Gender
 - o Sexual orientation
 - o Race
 - o Religion
- A list of specific action points for each of the Equality and Diversity areas to ensure that HPC meets its policies and duties
- A list of general action points to ensure that HPC meets its Equality and Diversity duties and policies
- A timeline and a statement of measurability for each of the above action points

In order to create the scheme, the following broad tasks have been agreed upon by the Equality and Diversity project team:

- To engage the services of an Equality and Diversity consultant to provide the project team with general training on the concept of Equality and Diversity and specific guidance on the processes required to create a scheme
- To set up a Project reference group, made up of internal volunteers to review all procedures within the organisation with regards to Equality and Diversity
- As a result of the procedure review, to determine a set of Equality and Diversity action points to ensure that HPC adheres to its policies
- To engage with external representatives of minority groups to verify that the action points identified are appropriate and adequate
- To gather demographic data on partners, employees, registrants, applicants, witnesses and complainants
- To use the demographic data gathered to create additional action points or modify those already drafted following the procedure review

In order to assure the quality of the scheme, the project team have determined that a pilot procedure review and demographic data gathering exercise will be undertaken prior to the main project. Since the Fitness to Practise (FTP) department has previously been identified as one of three priority areas (FTP, Communications and International Registrations) it has been chosen as the most appropriate department in which to conduct the pilot.

Given the widely acknowledged complexity of compiling and subsequently actioning an Equality and Diversity scheme, the project will be conducted over five years. For this reason it will be broken into two specific phases:

Phase 1 – The procedure review, the demographic data gathering and the writing of the Scheme

Phase 2 – The implementation of the action points listed in the Scheme

A template for each department's section of Phase 1 is depicted in Appendix 1 – this may be subject to change following the Fitness to Practise pilot.

Given the procedure review and demographic data collection timeline template and project resource restrictions, the broad timeline for Phase 1 of the project is listed below.

Each project task listed below will be subject to phased approval by Council and may therefore move as a consequence.

Project Tasks	Timeline Q = Calendar year quarter
Project preparation	Q3 to Q4 2006
Fitness to Practise department procedure review and demographic data gathering pilot	Q1 to Q3 2007
Communications and International Registrations departments procedure review	Q1 2008
UK Registrations, Approvals & Monitoring and IT departments procedure review	Q4 2008
HR and Partners departments procedure review	Q2 2009
Secretariat and Policy departments procedure review	Q4 2009
Office Services and Finance departments procedure review	Q3 2010
Applicant and Registrant demographic data gathering	Q3 2007 – Q1 2008
Job applicant and employee demographic data gathering	Q2 2009 – Q4 2009
Partner demographic data gathering	Q2 2009 – Q4 2009
HPC Equality and Diversity scheme to be published	Q2 2011

2006	2007	2008	2009	2010	2011
Project preparation					
	Fitness to Practise Pilot				
		Communications and Int'l Registrations			
		UK Registrations, Approvals & Monitoring and IT			
			HR and Partners		
			Secretariat and Policy		
				Office Services and Finance	
				Public consultation	
					Scheme published

Since Phase 2 is dependent on the type of action points identified, the timeline for this phase will be compiled as the Fitness to Practise pilot is being conducted.

Decision

The Council is asked to:

1. Agree the project approach for the Equality and Diversity project, as described in this paper
2. Request the Executive to report back to Council to:
 - o Provide a project update – 14th December 2006
 - o Approve the commencement of the next project stage – the Fitness to Practise pilot – 14th December 2006

Council is asked to provide comments to Claire Phillips (Project Manager) either prior to or during the Council meeting.

Contact details:

Tel: 0207 8409 774

Email: Claire.phillips@hpc-uk.org

Background information

None

Resource implications

Due to the nature of the project, the majority of resources required to create the Equality and Diversity scheme will be internal.

During Phase 1, initial calculations show that all participants involved in the procedure reviews will be required to spend an estimated 20 - 30% of their working week on the project.

During Phase 2, it is estimated that the continued capture of demographic data will increase workloads in the UK Registrations, International registrations, HR, Partners and Fitness to Practise departments by 2-5%.

In addition to this, it is estimated that the implementation of all actions identified in the Scheme will increase workloads in all departments by 5%.

Therefore it is estimated that the combined increased workload in Phase 2 will be 10% across the majority of departments within the organisation.

The above figures are, however, purely estimates and will be reviewed once the pilot conducted within the Fitness to Practise Department is complete.

To mitigate the resource risk involved in this project, the procedure reviews will be staggered to ensure that the project will only impact workloads for approximately 6 months in each of the five years for which the project is scheduled.

Financial implications

The financial implications of this project can be split into project costs and post implementation costs – both of which will be significant.

The main project costs will be incurred when collecting the demographic data. This is due to the fact that systems holding registrant, partner, employee, witness and complainants data will need to be modified to record demographic information. The systems will additionally require modifications to enable HPC to perform sophisticated statistical analysis in order to validate the action points identified during the procedure reviews.

Until the business requirements for the systems' modifications have been identified and assessed, meaningful financial estimates cannot be provided. However it is to be noted that each system will be assessed on an individual basis and the IT costs will be broken down into its component parts when budgets are applied for.

Significant additional costs will also be incurred when implementing all action points identified during the procedure reviews. However, these cannot be assessed until the procedure reviews have been completed.

Post implementation costs will mainly be focussed on the continuing task of collecting demographic data. This ongoing task will incur additional postage, printing and form design costs; again further information will be available following the Fitness to Practise pilot.

Appendices

Appendix 1 – Procedure review and demographic data gathering timeline template.

Appendix 2 – Project team list

Date of paper

29th August 2006

Appendix 1 – Procedure review and demographic data gathering timeline template.

Month 1		Month 2			Month 3			Month 4			Month 5			Month 6			Month 7			Month 8											
Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8	Week 9	Week 10	Week 11	Week 12	Week 13	Week 14	Week 15	Week 16	Week 17	Week 18	Week 19	Week 20	Week 21	Week 22	Week 23	Week 24	Week 25	Week 26	Week 27	Week 28	Week 29	Week 30	Week 31	Week 32
Identification of all relevant procedures and documentation		Review of all relevant procedures and documentation with project reference group		Compilation of all action points		Inclusion of action points in Scheme		Procedures and proposed action points to be discussed with external minority group representatives		Determine systems requirements		Produce required technology documentation		Conduct systems build		Perform systems testing		Perform user acceptance testing		Train users & rollout system		Launch data gathering exercise			Receive back and record target group data			Review and modify action points			

Appendix 2 – Project team list

The project team is made up of at least one senior member of staff from each department.

Project Sponsor – Marc Seale

Project Manager – Claire Phillips

Operations Department – Greg Ross Sampson

Registrations Departments – Richard Houghton

Approvals and Monitoring Department – Abigail Creighton

Fitness to Practise Department – Kelly Johnson, Eve Seall

Communications Department – Victoria Nash

Secretariat Department – Niamh O’Sullivan

Policy Department – Rachel Tripp

Finance Department – Simon Leicester

HR Department (including Partners Team) – Larissa Foster, Kelly Webster, Yasmin Hussain

IT Department – Roy Dunn

Office Services Department – Steve Hall

SEPTEMBER COUNCIL PAPER

HEALTH PROFESSIONS COUNCIL

Equality and Diversity

Introduction

The Health Professions Council (HPC) is the statutory regulator of thirteen health professions. Its primary function is to protect the public and it does so by:

- setting standards;
- approving programmes of education and training;
- registering health professionals; and
- investigating and adjudicating allegations about their fitness to practise.

In the course of doing so HPC interacts with a diverse range of people, including:

- the public, especially complainants or witnesses in fitness to practise proceedings;
- registrants and potential registrants;
- education and training providers;
- health care providers, professional bodies, consumer groups and other partner organisations;
- its employees and the “partners” who carry out tasks on its behalf.

Equality and diversity

HPC is committed to preventing discrimination, valuing diversity and achieving equality of opportunity in all that it does. This Equality and Diversity Scheme ('the Scheme') sets out the principles which HPC applies to make equality and diversity key elements of the way it works, in order to:

- develop and sustain a diverse workforce;
- create an environment in which everyone is able to work effectively and without having to face discrimination;
- provide a service that recognises, respects and responds to the diversity of the health professionals it regulates and the public it serves and protects.

The Race Relations (Amendment) Act 2000 places a duty on public authorities like HPC to promote race equality. Under the Act HPC, in performing its functions, must aim to:

- eliminate unlawful discrimination;
- promote equal opportunities;
- promote good relations between people from different racial groups.

The Scheme goes beyond requirements of that Act and uses its principles as a framework to promote equality in relation to:

- disability
- gender
- sexual orientation
- religion and belief

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- age.

Objectives

HPC is committed to ensuring that equality and diversity underpin all of its service and employment practices. At all levels of planning and service provision HPC will consider all in the community, whatever their race, gender, sexual orientation, age, disability or religion, to

- ensure that those who may be socially excluded are able to make use of the services of, and opportunities within, HPC;
- promote social inclusion by recognising and valuing individual differences and treating others with dignity and respect;
- by valuing diversity, gain access to a wider pool of knowledge, skills and experience;
- motivate employees by adopting an inclusive management approach;
- work towards HPC's culture valuing diversity in everything it does.

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Employment practices

HPC will treat all employees and anyone who applies for employment fairly and equally.

HPC will recruit on the basis of the objective criteria which properly reflect the skills and abilities needed for the job in question and will select candidates solely on the basis of merit.

HPC will provide its employees with equal access to training, development and promotion opportunities and will encourage all employees to take advantage of such opportunities. Promotion decisions will be taken on the basis of ability, or demonstrated potential, to do the job.

HPC will manage its employees fairly and appropriately, ensuring that there is no unlawful discrimination on any grounds in relation to employment activities such as work allocation, consultation and communication, appraisal, granting of leave, grievance or disciplinary matters.

HPC will provide a work environment in which employees are free from harassment and victimisation.

HPC will ensure that all employees are given appropriate training in equality and diversity and understand their responsibilities under relevant laws and policies.

Specific equality policies

Set out below are HPC's specific equality policies, which are the:

Race Equality Policy; *(insert website link when Scheme approved)*

Disability Equality Policy; *(insert website link when Scheme approved)*

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Gender and Sexual Equality Policy; *(insert website link when Scheme approved)*

Religion and Belief Equality Policy; and *(insert website link when Scheme approved)*

Age Equality Policy. *(insert website link when Scheme approved)*

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RACE EQUALITY POLICY

This policy is specific to issues relating to race and ethnicity.

The Race Relations Act 1976 makes it unlawful, without justification, to discriminate on grounds of race and, as amended by the Race Relations (Amendment) Act 2000 places a duty on public authorities to promote race equality.

HPC is committed to providing equal access to employment and the services it provides and will not discriminate on the grounds of race, colour, nationality, ethnic origin, cultural background or religion (where the religion is defined as a racial group).

HPC will:

- work with representatives of ethnic and racial groups to ensure that HPC's services meet their needs and to improve access to those services;
- promote access to information, services and decision-making through, the use of translation and interpretation services;
- welcome and encourage job applications from people from ethnic minority backgrounds;
- ensure that allegations of racial discrimination and harassment are investigated thoroughly, speedily and with sensitivity.

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DISABILITY EQUALITY POLICY

This policy is specific to issues relating to disability.

The Disability Discrimination Act 1995 applies to HPC in its capacity as an employer, service provider and the “qualifying body” for those it regulates. The Act makes it unlawful, without justification, to disabled people less favourably or to subject them to discrimination or harassment.

The Act defines disability as a physical or mental impairment, which has a substantial and long-term adverse effect upon a person’s ability to carry out normal day to day activities but HPC also recognises that society’s attitudes towards disabled people are one of the main barriers to ensuring that disabled people have equal rights of access to services and employment.

HPC is committed to providing equal access to employment and the services it provides and will not discriminate on the grounds of disability.

The HPC will:

- work with representatives of disabled people to ensure that HPC’s services meet their needs and to improve access to those services;
- promote access to information, services and decision-making through, for example, the use of interpretation for the hearing impaired, the use of Braille etc.
- ensure that, so far as possible, HPC events are held in premises which have appropriate facilities for disabled people;
- welcome and encourage job applications from disabled people;

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- undertake wherever possible, to retain employees who experience disability, by making reasonable changes to their duties or working environment;
- ensure that allegations of discrimination and harassment on the grounds of disability are investigated thoroughly, speedily and with sensitivity.

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GENDER AND SEXUAL EQUALITY POLICY

This policy is specific to the concerns of men, women, bi-sexual people, gay men, lesbian women, transgender people and those who are undergoing or who have undergone gender re-assignment.

The Sex Discrimination Act 1975 makes it unlawful to discriminate without justification on grounds of gender and the Sex Discrimination (Gender Reassignment) Regulations 1999 extend the protection provided by that Act to those undergoing or who have undergone gender reassignment.

HPC is committed to providing equal access to employment and the services it provides and will not discriminate on the grounds of gender, gender reassignment or sexual orientation.

HPC will:

- work with representatives of gay, lesbian, bi-sexual and transgender people to ensure that HPC's services meet their needs and to improve access to those services;
- confront homophobic attitudes, behaviour and language and encourage understanding of individual rights and attributes;
- encourage a culture of openness about sexual orientation and gender whilst maintaining the right to privacy;
- ensure men and women are paid the same for doing work of equal value and that flexible working policies apply equally to men and women, enabling them to make personal choices about their parenting, caring and work roles.
- ensure that allegations of discrimination and harassment on the grounds of gender, gender reassignment or sexual orientation are investigated thoroughly, speedily and with sensitivity.

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RELIGION AND BELIEF EQUALITY POLICY

This policy is specific to the concerns of people from different faith groups.

The Employment Equality (Religion or Belief) Regulations 2003 make it unlawful to discriminate without justification, on grounds of religion or belief by treating a person less favourably or subjecting them to victimisation or harassment.

HPC is committed to providing equal access to employment and the services it provides and will not discriminate on the grounds of religion or belief.

HPC will:

- ensure cultural and religious festivals, holidays and rights of worship are acknowledged and recognised across the organisation;
- where reasonably practical, ensure events and hearings are not scheduled on cultural or religious festivals so as to prevent people from attending;
- ensure leave is not unreasonably withheld from employees who may wish to celebrate cultural and religious festivals;
- not impose dress restrictions on employees which may be discriminatory, unless such restrictions can be objectively justified in terms of meeting a legitimate health and safety or business aim;
- ensure that allegations of discrimination and harassment on the grounds of religion or belief are investigated thoroughly, speedily and with sensitivity.

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AGE EQUALITY POLICY

This policy is specific to the concerns of people of all ages and in particular younger and older people.

Age discrimination occurs because assumptions are made about older and younger people that are based on inaccurate, outdated and inappropriate stereotypes.

HPC is committed to providing equal access to employment and the services it provides and will not discriminate on the grounds of age.

HPC will:

- encourage and support activity to which is aimed at eliminating ageist attitudes and practices;
- ensure that, in providing its services, it identifies and addresses the specific needs of different age groups, particularly older people and children;
- seek to employ a mixed-age workforce that includes older and younger people;
- where circumstances permit, support members employees who wish to work beyond the mandatory retirement age of 65, in order to retain their knowledge, skills and experience in a manner which benefits both parties;
- ensure that allegations of discrimination and harassment on the grounds of age are investigated thoroughly, speedily and with sensitivity.

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Towards an Equality and Diversity Scheme

1. Introduction

1.1 This document sets out the steps we will take to publish an equality and diversity scheme.

2. About the Health Professions Council

2.1 The Health Professions Council (HPC) is the statutory regulator of thirteen health professions. Its primary function is to protect the public and it does so by:

- setting standards;**
- approving programmes of education and training;**
- registering health professionals; and**
- investigating and adjudicating allegations about their fitness to practise.**

2.2 In the course of doing so we interact with a diverse range of people, including:

- the public, especially complainants or witnesses in fitness to practise proceedings;**
- registrants and potential registrants;**
- education and training providers;**
- health care providers, professional bodies, consumer groups and other partner organisations;**
- its employees and the “partners” who carry out tasks on its behalf.**

3. Legislation

3.1 In recent years, government policy has moved from legislating to ensure that public bodies treat all people they impact equally, to legislation to ensure that public bodies positively promote a diverse and inclusive society.

3.2 The Race Relations (Amendment) Act 2000 and the Disability Discrimination Act 2005 require that public bodies meet the following duties:

3.2.1 *The Race Relations (Amendment) Act 2000:*

Public authorities must have due regard to the need to:

- eliminate unlawful racial discrimination**
- promote equality of opportunity; and**
- promote good relations between people of different racial groups.**

3.2.2 *The Disability Discrimination Act 2005:*

Public authorities must have due regard to the need to:

- promote equality of opportunity between disabled persons and other persons;**
- eliminate discrimination that it is unlawful under the Act;**
- eliminate harassment of disabled persons that is related to their disabilities;**
- promote positive attitudes towards disabled persons;**
- encourage participation by disabled persons in public life; and**
- take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons.**

3.3 The two pieces of legislation place specific duties on certain public authorities to publish a race equality scheme and disability equality scheme setting out the steps they have taken to meet the general duty.

3.4 HPC is not bound by the specific duties under these pieces of legislation and is therefore not required to publish a scheme.

4. Our approach

4.1 We have decided that, as part of good practice, we will publish an equality and diversity scheme which will describe the steps we have taken to eliminate discrimination and promote equality in relation to:

- **Disability**
- **Age**
- **Gender**
- **Sexual orientation**
- **Race**
- **Religion**

4.2 In 2005, we produced statements of our policy in each of the areas listed above. These documents are available on our website.

5. Developing a scheme

5.1 In developing the project, we have used the Race Relations (Amendment) Act 2000 and the Commission for Racial Equality's Code of Practice on the duty to promote race equality as guidance.

5.2 We want to publish an equality diversity scheme which is comprehensive and meaningful, setting out in clear language the steps we have taken to eliminate discrimination and promote equality and diversity. In order for the scheme to be meaningful, we have agreed a project timetable which would see our scheme published in 2010.

5.3 The project to develop an equality and diversity scheme will be run with an internal project team overseen by a project manager.

5.4 As we are developing the scheme we will make information publicly available on our website. Please see 10.2

5.5 The steps we will take to produce the scheme are given at points 6 to 9.

6. Identifying our processes and assessing impact

6.1 In developing the scheme, we will identify our processes which are relevant to the general duties outlined in the legislation and which might affect different people on the basis of their sex, age, gender, race, sexual orientation or religion.

6.2 We will list all of our processes in all of our business areas:

- **Fitness to practise**
- **Communications**
- **International registrations**
- **UK registrations**
- **Approvals and Monitoring**
- **Information Technology**
- **Human Resources and Partners**
- **Secretariat**
- **Policy and Standards**
- **Office Services**
- **Finance**

6.3 We will assess the impact of each of the processes upon different groups of people and place them in order of priority.

6.4 In assessing the impact of our processes, we will consider whether and how they might adversely impact or act as a barrier to particular groups. We will follow the guidance for doing this outlined in the Codes of practice produced by the Commission for Racial Equality and Disability Rights Commission.

7. Action points

7.1 Once we have identified all our processes, assessed their impact and prioritised them, we will identify action points.

7.2 The action points will set out what steps we will take to change the way in which we work so that we can remedy or mitigate any adverse impact our processes may have on certain groups.

7.3 We will also identify where further consultation is necessary. In particular, by considering whether consultation would be proportionate to the importance of the process and the extent of the impact identified.

8. Consultation

8.1 Where we have identified consultation is appropriate, we will consult internally and externally.

8.2 We will establish an internal reference group drawn from employees to review the action points.

8.3 The reference group will, as far as possible, attempt to reflect the diversity of employees and be drawn from the different groups identified in 4.1.

8.4 The role of the reference group will be to review and validate the action points identified by the project team. The group will also be asked to provide input into the work produced in order to meet the action points.

8.5 After consideration by the internal working group, and where appropriate, we will consult externally with representatives of the groups identified in 4.1.

8.6 We will decide on a means of communication which is appropriate (and proportionate) to the individual process or work being examined. This might include face-to-face meetings or asking for feedback via e-mail.

8.7 The terms of reference for the internal reference group are available from the equality and diversity section on our website.

9. Demographic data

9.1 The collection of demographic data is both an early action point and an integral part of producing the scheme.

9.2 Throughout the project we will collect demographic data which we will use in assessing and monitoring the impact of our processes.

10. Publication of information

10.1 In the finalised scheme we will explain our plans for how and when will make information available about our progress in meeting the action points we identify in the scheme.

10.2 Whilst we are working towards a scheme, we will publish information about the project on our website. This will include our action points for each business area (once complete).

10.3 The statements of policy referred to in 4.1 will also be available on our website, together with links to relevant council papers.

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