Council

23 March 2022

hcpc | health & care professions council

Equality, Diversity and Inclusion Action Plan

Executive Summary

This paper sets out how we will deliver on commitments made in the HCPC's EDI Strategy 2021-26.

The actions listed are those required to meet the commitments made when Council agreed our strategy in March 2021. We have engaged widely in the development of this action plan, meeting with action holders, the Senior Leadership Group across HCPC and our external EDI Forum.

The plan builds on significant progress made to date this year on our EDI activities (see pages 1-4 of our action plan paper). Equality monitoring information in the registration portal was launched on the 1st of December, forming the most important foundation of our ability to meet PSA Standard 3. Although data collection is not the sole basis on which regulators can fully meet the standard, collection of this data will enable us to develop a far greater understanding of the profile of our registrants and, crucially, to analyse the impact of our processes – including fitness to practise – across protected characteristics.

Our action plan is ambitious, and we will need to hold ourselves to account for its delivery. An effective EDI Steering Group will be fundamental to effective oversight, and we will relaunch our steering group alongside the launch of the action plan to ensure effective ongoing delivery over the plan's lifetime. The plan will be a living document that will develop over time, for example, as our activities become more targeted in response to the findings of our analysis, and/or in response to changes in the external environment. Our ambition is that this action plan, and our effective oversight of it, will maximise our progress over the lifetime of our EDI Strategy.

Previous consideration	Council approved our Equality, Diversity and Inclusion Strategy in March 2021 and in summer 2021, Council reviewed our Diversity Data Report.
Decision	Council is asked to approve the annexed action plan, noting that the plan will mature and develop over time.
Next steps	The action plan will be launched and overseen by the EDI Steering Group.
Strategic priority	This work engages each of the six strategic priorities and constitutes the plan to deliver on our existing commitments.

EDI is specifically highlighted within Objective 4 of our Corporate Plan 2022-23: 'Be visible, engaged and informed'.

Financial and resource implications	Our intent is that wherever possible, we will take advantage of work that is already agreed and in train to deliver against commitments. However, ongoing scoping will be required where projects are not currently committed, in particular in relation to work planned beyond 2022-23. Ongoing planning work will be overseen by our EDI Steering Group and will form part of our annual corporate and financial planning cycle, as it has informed our corporate plan for 2022-23 (set out in a separate paper to this Council meeting).
EDI impact	There is no separate equality analysis of this Equality, Diversity and Inclusion action plan. This body of work exists because of, and in effect is, an organisation-wide equality analysis. The actions contained within the plan set out how the HCPC will meet and exceed our statutory obligations, and how we will be taking future actions to mitigate against any negative or unwanted impacts of our regulatory functions, our business decisions and our employment strategies.
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EDI Action Plan 2021 - 2026

March 2022

1.   Background

1.1   In March 2021, Council approved the HCPC EDI strategy 2021 - 2026. In order to deliver on the commitments that we made to Council, we need to identify the actions that every part of the organisation will need to complete to fulfil our ambitions. The action plan (appendix 1) sets out these actions.

1.2   Since the approval of the strategy, the HCPC has continued to improve its organisational approach to EDI in the following ways:

2.   Data collection and analysis

2.1   We have significantly developed the quality and usefulness of the diversity data we hold about our registrants this year. After our first survey in 2020, we held diversity data for approximately 6% of our registrants. This tripled to 18% after our second survey in 2020/21, which in turn allowed us to produce our 2021 analytical report and profession-specific fact sheets.

2.2   Our Diversity Data Survey 2020-21 report, providing analysis of data collected from the registrant EDI survey, was approved by Council in July 2021 and published in October 2021. We also developed and published Profession specific factsheets providing easy access to key diversity information relating to each profession.

2.3   To improve our approach further and continue to increase our data collection, in December 2021, we launched equality monitoring within our registrant portal, which enables registrants to provide and update their diversity information at the point of renewal or at any other time. The data capture in our portal covers the same areas as the 2020/21 survey.

2.4   Since the launch of the online diversity data capture as part of the registrant portal, approximately 23% of registrants who renewed in December and January provided their EDI information. We then reviewed our communications and the operation of our portal to coincide with the opening of the physiotherapists' renewal window on 1 February. To date, 56% of the physiotherapists who have renewed their registration have provided their diversity data, meaning we currently hold EDI data for 33% of registered physiotherapists. At the end of our two-year renewal cycle, we will have offered every registrant the opportunity to provide their equality monitoring

information to us, as well as every new registrant. We are confident that this will ensure the levels of data we hold are in line with other regulators.

2.5 Recognising that the majority of our fitness to practise concerns are raised by employers, we nonetheless plan, in 2022, to capture complainant diversity data as part of planned upgrades to our fitness to practise case management system. As sufficient data is captured, this will allow us to also analyse fitness to practise case outcomes on the basis of complainant diversity.

2.6 In January 2022, we ran our first internal analysis of the data we hold for registrants' recorded sex and age, and the relationship these factors have to the proportion of registrants involved in our fitness to practise processes. As EDI data completeness grows this work will incorporate the whole range of protected characteristics. Where any such issues are found, HCPC will develop programmes of work to tackle these problems, in addition to initiatives already in place, such as regular EDI training for HCPC's Partners.

3. Engagement and responsiveness

3.1 The HCPC EDI Forum, made up of over 100 registrants and others with lived experience, expertise or an interest in EDI, met three times in 2021 and contributed to the development of, or discussed the findings on topics including, our:

- Joining the UK workforce programme
- Guidance on health and character
- New approach to quality assurance of education
- HCPC response to the DHSC consultation on mandatory vaccination for frontline health and care staff
- Diversity data report 2021 (as referenced above)
- Beyond barriers programme (internal mentoring programme)
- Gender and Ethnicity Pay Gap reports

3.2 Feedback from this group suggests that our work on EDI is being recognised within our sector, with stakeholders inviting HCPC to present on our work in this area to their constituents. For example, we presented on our EDI initiatives, progress and data at the All Wales Conference of the Wales Allied Health Professions and Scientific Advisory Committees in November 2021 and we have been invited to present on our EDI work to the Chartered Society of Physiotherapists.

3.3 Our 'Joining the UK workforce' programme, which supports our international registrants' transition into UK practice, was developed directly as a result of discussions and suggestions from our EDI forum who highlighted the need for support to international registrants to help promote equity in the healthcare workforce.

3.4 In October 2021, we launched our refreshed website pages providing our EDI information and bringing together our strategy and reports.

3.5   Our response to the government's consultation on mandatory vaccination drew on discussions with our EDI Forum and available data relevant to potential impacts on registrants and the public, including pregnant women, those with disabilities and ethnic minorities. It highlighted a number of potential equality impacts for government's consideration. HCPC recognises that the pandemic has not affected every person equally and has supported government-funded research (UK-REACH) to help understand why people from certain ethnic minorities are more likely to have severe COVID-19.

4.   Guidance

4.1   In September 2021, we published our new Guidance on Health and Character, which is supported by a range of case studies and resources to support those who may need to declare a health condition, with an approach that supports effective management of mental and physical health (both of which can relate to disability), as well as using more disability-inclusive language.

4.2   This month, we published a blog on practices known as 'conversion therapy' to reinforce our position that this practice is not compliant with HCPC's Standards. Our blog also provides guidance to explain that where therapeutic approaches relating to gender identity are evidence-based and an effective or beneficial therapy for a patient or service user, this would not contravene HCPC's Standards. This could include therapies provided, for example, in the context of Gender Identity Development Services. This blog is published alongside our response supporting the Government Equalities Office's consultation proposals on banning conversion therapy.

5.   Standards

5.1   This year, we have reviewed the Standards of Proficiency for all 15 of our professions and significantly strengthened our approach to EDI in the proposals.

5.2   We have included new specific EDI obligations in the generic standards which apply to all professions. For several profession-specific standards, standalone EDI requirements have also been added as part of this review as appropriate.

5.3   We have increased our expectations to more active requirements, for example, a duty to act on EDI concerns rather than to simply understand the importance of EDI.

5.4   The consultation and development process has included specific EDI elements. For example, EDI was a key theme of workshops conducted with stakeholders, where we sought feedback on what more we could do to promote equality, diversity and inclusion and combat discrimination. Our public consultation also included specific questions relating to EDI to inform our approach and equality impact assessment, and our thematic analysis of

the consultation includes these with other feedback consultees made relating to EDI within the proposed standards.

6. The HCPC's diversity

6.1 Council agreed to continue the Council Apprentice programme into 2022 with two new apprentices selected. We saw a great increase in interest in the second year, as awareness of the opportunity had spread due in part to our first apprentices being advocates of the uniqueness of the opportunity. We were delighted to welcome our two new 2022 apprentices in January this year. The HCPC has been a leader in introducing this scheme.

6.2 Our Diversity Data Report 2021 reports that 48% of our staff and 34% of managers identify as Black, Asian or from another ethnic minority background. For the first time this year, ahead of any legal requirement to do so, we have published our ethnicity pay gap report, alongside our existing gender pay gap report (here). While our gaps are smaller than relevant benchmarks, our reports set out the steps we are taking to address those gaps.

6.3 In September 2021, we launched our 'Beyond Barriers' mentoring programme. This aims to support the development of under-represented groups into more senior roles. We have given priority for mentoring to staff from ethnic minority backgrounds, underrepresented groups and other protected characteristics including LGBT+ and returning parents. Mentoring for those who applied to the programme commenced in January 2022. In January 2022 we also commenced a 6-month women's leadership and coaching programme to support the development of women across our Senior Leadership Team.

7. The 2021 - 2026 plan

7.1 The action plan sets out what comes next, and how we build on these foundations. It sits across the entire organisation, committing our regulatory teams, our external-facing teams, our internal support functions and our HR team to the specific projects without which we would not be able to meet our commitments. These projects will not necessarily be stand-alone EDI projects – in fact, the majority of the actions identified will be delivered through the course of wider-scale work. This is deliberate. Our commitments will not be met without fundamentally embedding EDI into the day-to-day business of the HCPC, and our focus must be on ensuring that every project, every programme and every decision we take is viewed through the lens of EDI, so that our opportunities are maximised.

7.2 In developing these actions, the strategic lead for EDI has drawn on multiple sources of information. In March 2021, Diversity Mackenzie produced a gap analysis, identifying areas of potential improvement and development for the HCPC. These findings have been incorporated into the action plan (eg the actions to address the identified gaps in our understanding of the registrant profile, development and training of staff, and the development of our HR reporting), whilst the progress as detailed above also drew heavily on the gap

analysis. We have engaged seriously with action holders, heads of service and the ELT to ensure that the scale of commitment is understood, and reflected in this plan.

7.3   As the strategy was agreed in 2021, the plan also notes actions that are already underway or, in a minority of cases, already delivered. This is so that stakeholders, internal and external, will be able to see all the high-level actions that HCPC have delivered at the end of the period covered by the strategy.

7.4   Our EDI action plan is a living document; it will need to be responsive to our environment. For example, many of the actions relate to things we are yet to discover – for example, our understanding of any disproportionality we may see in fitness to practise or registration decisions – and so actions will inevitably follow from our future learning. Furthermore, as the delivery model relies upon organisational commitments, we will need to review our action plan in line with those commitments. We are committed to delivering these actions to achieve our ambitions over the lifetime of our Strategy, but delivery dates for some items are likely to change, particularly those where investment is required, or which are dependent on external deliverables, or need to be developed and shaped by ongoing analysis.

7.5   Our future commitments will also be informed by the way we engage with those around us, our stakeholders and the health and care systems we support. EDI is a constantly evolving field, with few concrete answers – it is not yet fully known what it takes to remove unfairness from regulatory systems, and sharing information will be vital. In line with other regulators, our solutions to problems will need to take the form of 'develop, implement, review, revise'. This iterative approach is used by other regulators and reflects the reality of how we must work to understand what has impact, to reassess our plans and work with others in a responsive way.

8.   Outline

8.1   Below shows an outline of the progress we would expect to make through our action plan. Only a minority of high-level actions are listed to provide an overview of our expectations; the full action plan is set out in the appendix.

Year 1 (2021/22):

- Collection of increased registrant diversity data via survey and first published analysis including the promotion of our profession specific factsheets (complete)
- Collection of registrant diversity data at point of renewal (complete)
- Launch of mentoring and leadership programmes (complete)
- Launch of new 'Joining the UK workforce' programme (complete)
- Refreshed governance to drive and oversee delivery of EDI action plan

Year 2 (2022/23):

- Policy development manual with clear EDI considerations embedded
- Roll out new Standards of Proficiency with improved approach to EDI
- Collection of new registrant diversity data at point of application
- Collection of complainant diversity data
- Initial analysis of fitness to practise cases in relation to protected characteristics
- Begin review of Partner diversity, eg in recruitment
- Begin project to update Standards of Conduct, Performance and Ethics
- Review of the HCPC's competency framework
- EDI audit commissioned

Year 3 (2023/24):

- Standards for Education and Training review & consideration of EDI approach in education quality assurance model
- Full analysis of fitness to practise cases in relation to protected characteristics (both registrants and complainants)
- Development of specific action plan to address issues identified in data analysis
- Full reporting on available regulatory data
- Review of the effectiveness and expansion of mentoring and leadership programmes
- Review of fitness to practise indicative sanctions bank to understand EDI impact
- Development of EDI communications plan

Year 4 (2024/25):

- Deliver actions to address any inequities identified in data analysis
- Review of Partner EDI training
- Review of inclusion amongst pool of Partners
- Review Education QA model for responsiveness to EDI
- Review indicative sanctions guidance
- Review HCPC procurement to ensure EDI is appropriately considered

Year 5 (2025/26:

- Online data solution, including anonymised EDI statistics
- Deliver actions to address any inequities identified in data analysis
- Embed improvements to EDI training
- Review of the HCPC behaviour and values framework

9.   Oversight

9.1   Alongside the plan is the body who will oversee its delivery. This EDI Steering Group will be chaired by the executive sponsor for EDI, the Executive Director

of Professional Practice and Insight, and supported by the Strategic Lead for EDI. Membership will comprise action holders, the majority of whom will be heads of service and leads for their respective areas of business, a member of our Staff Forum, and a member from our EDI representatives/champions.

9.2   The Steering Group will:

- Receive updates from action holders on progress relating to the actions for which they are responsible
- Provide advice, guidance and challenge to action holders
- Identify further actions required in light of progress made by the organisation, or as a result of other external or internal developments.

This group will also be supported by working groups, as and when required.

10.   Progress reporting

10.1   EDI is currently included within HCPC's annual reporting mechanisms. It is envisaged that progress against this action plan will be reported as part of established reporting to Council, but Council may also request further reporting on specific themes or actions separately to this.

11.   Communications and engagement

11.1   We will use a series of communications and engagement opportunities throughout the lifetime of the action plan. Indeed, engagement has featured as a core principle of the development of this action plan. As part of development:

- An outline for delivery was shared with ELT in December 2021, and with the wider Senior Leadership Team in January 2022
- Action holders have been engaged during the development of the plan
- An action plan framework was shared with our external EDI Forum in March 2022, where members expressed strong support for the direction the HCPC is taking on this agenda

11.2   The action plan itself also commits the HCPC to promoting our EDI work widely, with a dedicated EDI communications plan as a specific action to be developed, supporting the delivery of this action plan.

EDI action plan

#	Action	Outcome	Deliverables	Timescales	Owner
	Objective 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				
1	Review our Standards of Proficiency for registrants to ensure that the diverse health needs of the 21st century UK population are reflected	Registrants are able to meet the health needs of a diverse population, keeping pace with change Education and training programmes equip learners with skills to meet SOPs.	Updated Standards of Proficiency (SOPs) ensure that HCPC registrants are an active part of a health and care workforce which is prepared to offer care to a diverse population of service users	**Publication April 2022** **Implementation in all educational programmes concludes Sept 2023**	**Policy**
2	Ensure our regulatory and organisational policy development methodology considers relevant EDI factors at every stage	HCPC policies will be based on good quality EDI knowledge and understanding	Review of policy methodology Updated policy development manual and processes to build EDI consideration into every stage EIAs are produced and considered for every policy development	**Q1+Q2 2022/3**	**Policy**
3	Review our Standards of Conduct, Performance and Ethics to ensure they reflect our EDI expectations	Our expectations of registrants are clear, allowing us to take decisive action EDI-related issues raised with us	Consider new or revised standards in our Standards of Conduct, Performance and Ethics (SCPEs) to explicitly reference EDI Updated SCPEs	**Planning and initiation Q1 2022/3** **Consultation Q4 2022/3**	**Policy**

4	Review our education and training programme standards to ensure that provision for learner welfare properly addresses EDI concerns	HCPC approval is only granted to programmes and institutions which properly address EDI concerns	Guidance developed for education institutions on meeting HCPC expectations Updated Standards Relevant to Education and Training (SETs) to fully address EDI issues Approval process updated to capture EDI issues at point of approval Education staff and partners receive role-specific training to understand how to ensure the EDI issues of learner welfare are properly protected	**SETs review planning and initiation 2022** **Consultation 2023/4**	**Policy**
5	Review our work to develop preceptorship support to ensure that any differences in early-careers outcomes inform our outputs	All registrants in the early years of their careers receive support and guidance that secures successful futures	We support the development of an EIA on preceptorship work We support research to understand any gaps across relevant protected characteristics in the support they receive The outputs of preceptorship work reflect any EDI findings	**Preceptorship research to commence 2022/23**	**Policy**
6	Review our readmission to the register/returners to practise policies and processes so that the EDI impacts of these policies are understood and, where relevant, negative impacts are mitigated against	Our expectations of registrants are clear, and we do not unfairly prevent people from re-joining the register	Review of our requirements for readmission/return to practise to ensure no unfair impacts Updated requirements for readmission/return to practise	**2023/24**	**Policy**
7	Review HCPC internal decision-making frameworks to ensure that consideration is given to EDI issues at every formal decision point	HCPC makes its decisions with EDI at the forefront of its considerations	HCPC decision making frameworks updated to require EDI consideration, and supporting information, at relevant decision points Council and ELT papers require EDI information for every submission	**Q1 2022/23**	**Governance**

8	Conduct an EDI audit with our internal audit partner	We are assured that the HCPC's delivery of its EDI obligations and commitments is transparently assessed and recorded	Commission of EDI audit Review of findings	**2022/23**	**Governance**
9	Review of previous high-impact decisions to understand how EDI did/could have influenced outcomes	We understand where previous opportunities may have been overlooked and can plan to address any findings	Commission post-decision review (in line with Risk Appetite review) Produce review Develop actions in light of review findings	**2024/25**	**Governance**
10	Review HCPC procurement to ensure EDI is properly considered when awarding contracts	Our procurement actively supports our ambitions, ensuring that contractors and suppliers meet our own standards, and can uphold our commitments	HCPC include ability of suppliers to demonstrate EDI awareness and capabilities as a decision-making factor for assessing tenders Spending decisions are assessed for their impact on EDI objectives and duties	**2024/25**	**Finance**
11	Refreshed oversight mechanism for EDI that also supports external scrutiny of our progress	We are held to account for the delivery of the commitments we make	New terms of reference, refreshed membership Launch oversight body	**March 2022**	**Equality, diversity and inclusion**
12	Review our support measures for vulnerable registrants, complainants and witnesses	Vulnerable registrants, complainants and witnesses are fully supported to participate in FtP processes without disadvantage	Resources and support developed for registrants, complainants and witnesses FtP staff receive role-specific training on supporting vulnerable parties	• **Linked to FTP workplans:** • **Lay advocacy March 2023** • **Registrant careline – scoping March 2023** • **Support for unrepresented registrants beginning March 2023 and onwards**	**Fitness to practise**

		Objective 2 - We can evidence that our data informs our policies, processes and decisions and our stakeholders report the positive impacts			
13	Introduce regular reporting across all our regulatory activities across all protected characteristics	HCPC has access to information it needs to understand the impact of its functions, and shares this transparently	HCPC collects EDI data relevant to all of its regulatory functions, including: • Application decisions • Fitness to practise stages HCPC produces anonymised, analytical reports on: • fitness to practise across all stages of the triage and investigation process, • outcomes from tribunals • outcomes from registration approval decisions • outcomes from registration appeals decisions Reports include analysis of the data to provide contextual understanding	**All data will be collectable by end 2022** **Full reporting on available data will be possible by 2023/24 (interim reporting will continue throughout development)**	**Regulation directorate**
14	Set further actions from our EDI reporting across all our regulatory activities, across all protected characteristics	Our EDI reporting influences the direction of our regulatory functions, and we act on our findings	Fitness to Practise and Registration set actions based on findings from EDI reporting Policies are updated, based on findings from EDI reporting Policy Team development process updated to ensure EDI is considered for every policy development	**Ongoing**	**Regulation directorate**
15	Introduce EDI monitoring for FTP complainants	We understand who is able to access our FTP services	New FTP system for handling FTP complainants that captures EDI monitoring information Regular reporting on EDI characteristics of complainants, including metrics eg case progressed or not, case outcome	**Dec 2022** **Ongoing reporting possible from March 2023**	**FTP** **Business Change**

16	Commission analysis of differential rates of success across protected characteristics for the education programmes we approve	We understand the impact of the educational programmes we approve on fair learning experiences for all learners	Develop sources of information for EDI characteristics of learners in HCPC approved programmes Analysis of EDI information to understand pass rates/assessment outcomes across protected characteristics	**2023/4**	**Education** **Insight and Analytics**
17	Develop online data solution where we can anonymously publish the EDI data we hold and make it publicly reviewable	The HCPC transparently shares its EDI data and makes it available to all	Develop specification for online data resource to include EDI data Online data solution developed	**Commence 2025/26**	**IT & Digital Transformation**
	Objective 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				
18	Review our indicative sanctions guidance	We recognise the seriousness of discrimination by our registrants, and we are confident that our application of sanctions is fair	Consider new or revised sanctions for issues relating to discrimination and harassment (including sexual harassment and misconduct) Review consideration of mitigating factors in application of sanctions Updated indicative sanctions guidance	**2024/25**	**Policy**
19	Review of our regulatory reform work through an EDI lens to explore every opportunity to remove disadvantage and discrimination	The legislation HCPC works under is not a barrier to delivering on our EDI ambitions	Detailed EIA on HCPC regulatory reform project completed and reported to ELT Actions arising from EIA are progressed with ELT support	**TBC following Government timetable**	**Policy**
20	Review our education QA model to ensure that we respond to concerns relating to discrimination and bias in education and training environments, or education that no longer meets our EDI expectations	Education and training is free from bias and discrimination	Review our ongoing QA and performance review of education and training Develop QA process for receiving 'live' feedback and addressing concerns around EDI Guidance for educators on tackling EDI issues on programmes	**2024/25**	**Education**

21	Review our process for ensuring registrants applying from overseas are able to join the register, including how applications are evidenced, our list of pre-approved programmes and any other relevant factors	HCPC treatment of overseas applicants for registration is fair and proportionate	Review of overseas application process Review of pre-approved list of overseas education programmes	**Commenced Q4 2021/22**	**Registration**
22	Review requirements for continuing professional development (CPD) for registrants to ensure no unfair impact, and that registrants are able to demonstrate our expectations around EDI in CPD	The HCPC ensures registrants keep their EDI competencies up to date, and that we fairly check for this in our CPD process	Review of CPD requirements Updated CPD requirements	**2023/24**	**Registration**
23	Introduce EDI information capture from corporate complaint parties	We understand the profile and experiences of people who make complaints about HCPC	New complaint handling system to capture EDI information Analysis and reporting of complainants by protected characteristic	**2024/25 – as part of replacement of legacy system**	**Governance**
24	Review the bank of conditions we may apply to registrants' practice as part of fitness to practise actions	The conditions we apply do not disproportionately impact on specific groups and support safe and effective practise for all	Review of conditions within bank Updated conditions bank	**Commence Q4 2022/23**	**Fitness to practise**
25	Review fitness to practice guidance for decision makers – including triage, threshold and investigation committees	The HCPC makes fair decisions throughout the FTP process	Updated decision making guidance for FTP	**Triage review planned for 2023/24**	**Fitness to practise**
26	Review of our tribunal service guidance and decision-making frameworks	HCP Tribunal Service make fair decisions	Updated decision making guidance for HCP Tribunal Service	**2023/24**	**Fitness to practise Partners**

	Objective 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				
27	Analyse responses to engagement activities (eg perception surveys, questionnaires etc) by protected characteristics	We understand and respond to how different groups experience their interactions with the HCPC	Collect EDI data from respondents to surveys/questionnaires Produce sentiment reports analysed by protected characteristics Reports provided to ELT for scrutiny and action planning	**Ongoing commitment as data collected**	**Comms/ Professional Liaison/ Strategic Engagement/ Insight & Analytics**
28	Review our engagement activities to ensure we are meeting needs of diverse stakeholders	We understand and respond to how different groups experience their interactions with the HCPC	Review our engagement events and activities to ensure we are effectively communicating across all groups who share protected characteristics Develop an EDI communications plan	**2023/24**	**Comms/ Professional Liaison/ Strategic Engagement**
29	Update the wording of the health and character declaration to better prevent unnecessary declarations from registrants	We ask for relevant information in a tone that reflects our understanding of the sensitivity involved	Review health and character declaration Updated declaration and supporting guidance	**March 2022**	**Policy**
30	Ensure training and development for our Council and leadership teams remains relevant to their role in making the HCPC a fair, inclusiv e organisation	Our leaders are capable and confident leading an ambitious EDI strategy	Updated development programme for Council continues to incorporate EDI elements relevant to their role Updated training programme for ELT continues to incorporate EDI elements relevant to their role	**2023/24**	**Governance HR**

	Objective 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				
31	Develop an EDI communication plan to promote the work we do around EDI	Our stakeholders understand the steps we are taking to promote and enhance fairness in regulation and employment	Develop an EDI communication plan	**Contained within Communication Plan** **April 2022**	**Comms**
32	Review our communication approach, including events, to ensure we are meeting needs of diverse stakeholders	We understand and respond to how different groups experience their interactions with the HCPC	Review our communication methods, approach and tone/style to ensure they are appropriate for diverse audiences	**New registrant communications strategy in Q3 2022/3**	**Comms**
33	Ensure that our communication activity is reaching the widest possible audience, with no groups disadvantaged or omitted	Every stakeholder is able to access our messaging, and well informed about our activities	Review the effectiveness of our communications with analysis by protected characteristics Develop response, including widening our avenues of communication where necessary and developing our reach	**April 2023/24**	**Comms**
34	Review of our use of images across all communication platforms and publications	The image we present of the HCPC, the public and of health and care professions reflects the diversity of them	Review the use of imagery across our publications Update our image banks to ensure it keeps pace with the communities they represent Produce a clear branding guide that explains our rationale and our intentions	**Commence Q1 2024/25**	**Comms**
35	Develop registrant health and wellbeing work to ensure that we can support the needs of all registrants, and that EDI informs the nature of the work we do to support wellbeing	All registrants benefit from enhance support for their health and wellbeing, and our support meets the needs of the diversity of the register	Review of the health and wellbeing programmes to ensure EDI has been fully utilised to understand the needs of the professions Specific workstreams/actions planned in response to our findings	**Conduct review 2023/24**	**Professionalism and Upstream Regulation**

	Objective 6 - Continue to ensure, promote and harness the rich diversity of our colleagues and Partners, ensuring a diverse workforce and representation at all levels				
36	Analyse and report on our staff survey results by all protected characteristics	We understand and act upon any differences in experiences as employees and partners, as shown through our staff survey	Staff survey report with protected characteristic breakdown HR develop action plans based on findings from EDI reporting	**Pilot EDI data capture during hybrid working staff survey Q3 2022** **Following staff survey, actions fed to HR work plan**	**HR**
37	Introduce regular reporting across all our employment activities across all protected characteristics	HCPC has access to information it needs to understand the impact of its work as an employer, and shares this transparently	HR collect data for all protected characteristics for all relevant activities, including Recruitment Retention Progression Employee relations cases Pay gap reporting HCPC produces reports on all relevant HR activities Reports include analysis of the data to provide contextual understanding	**Quarterly reports to PRC** **Updated reports for Q3 2022/23**	**HR**
38	Set further actions from our EDI reporting across all of our HR activities, across all protected characteristics	Our EDI reporting influences the direction of our people strategy and our HR activities, and we act on our findings	HR develop action plans based on findings from EDI reporting Policies are updated, based on findings from EDI reporting HR People Plan reflects EDI analysis HR report regularly on progress through action plan	**Ongoing**	**HR**

39	Produce pay gap reports on relevant protected characteristics (currently gender and race)	We understand our pay differentials across relevant protected characteristics and plan actions to address gaps	Scoping of existing data to understanding what future package of reporting could include Develop further analysis of pay gaps across other protected characteristics Produce actions to address gaps	**Scoping Q1 2023/24**	**HR**
40	Review our pay and award framework to ensure that it supports our ambitions to eliminate unfairness in pay awards	Our pay and award framework progressively supports determination to be a fair employer	New pay and award framework developed based on findings of pay gap reports and supporting contextual analysis	**People Strategy 2025/26**	**HR**
41	Review our existing EDI training for all staff and partners	Our staff and partners have the tools to address and challenge behaviours and practices that do not match up to our expectations	Training needs analysis for all staff and partners (including induction and refresher training) Improve training provision to meet needs, including adjustment for new hybrid working model	**Begin training needs analysis 2023/24**	**HR Partners**
42	Review HCPC use of Partners to ensure we have access to diversity of talent in our pool	HCPC has access to diversity of talent in our pool of partners who are well-equipped to support our priorities	Review our partner recruitment activity Review our codes of conduct for partners Set actions to address highlighted issues	**Begin scoping Q2 2022-23**	**Partners**
43	Review of our appointment process for Council to attract a diverse pool of high quality candidates	The diversity of our registrant and public populations is well represented at Council and our Council is best able to lead on the HCPC's EDI agenda	Appointment strategy reviewed to identify opportunities to attract a wider, more diverse pool of candidates A diverse shortlist of candidates feeds our appointment process Review questions relating to EDI competence at interview stage	**Q2 2022/23**	**Governance**

	Objective 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				
44	Survey HCPC Partners to understand, by protected characteristics, their experiences of inclusion and belonging and develop actions from findings	All of our Partners share the benefits of inclusion and belonging	Survey of Partners to understand their experiences of inclusion and belonging Actions to address findings	**2024/25**	**Partners**
45	Continue to develop the Aspiring Leaders programme to support groups under-represented in leadership roles to develop into the	HCPC supports all staff to develop and enhance the skills they need to become organisational leaders	Introduce Aspiring Leaders Review impact of AL programme Develop further based on findings, including its accessibility for under represented groups	**Launched Q3 2021/22** **Review planned for 2023/24**	**HR**
46	Develop a mentoring scheme to support the development of staff under-represented at managerial levels	Our organisation supports the development of people from all backgrounds to fulfil their ambitions	Development of mentoring scheme principles Launch mentoring scheme with support from senior staff	**Launched Q3 2021/22**	**HR**
47	Review HCPC competency framework to ensure EDI expectations are properly captured	Our managers, leaders and partners are confident and competent role models for the values of the organisation	Updated HCPC competency framework, tailored to different role-types in organisation Training on new/updated competencies	**Q4 2022/23**	**HR**
48	Review HCPC behaviours and values framework to ensure EDI expectations are properly captured	Our managers, leaders and partners are confident and competent role models for the values of the organisation	Updated HCPC behaviours and values framework, tailored to different role-types in organisation Training on new/updated behaviours and values	**2025/26**	**HR**