

Date: 18 May 2022

Title: Equality, Diversity and Inclusion update

Responsible Director: Mark Stobbs

Paper for Noting

Open paper

1. Issue

This paper provides an update for the Board on our work on equality diversity and inclusion (EDI) since the last meeting.

2. Recommendation

The Board is asked to note the paper.

3. Background

At its last meeting, the Board made a number of comments on the draft EDI plan for 2022/23. Following that, we made some changes. The plan has now been circulated and work has begun on delivering it.

Two staff training sessions from people who are disabled and trans have taken place and were well-received.

4. Next steps

We will be tracking progress against the plan at Directors Group each month and reporting to the Scrutiny and Finance Committees on progress at their meetings. The Board will receive a progress report at each meeting. A copy of the Tracking document is at Annexe A.

5. Finance and Resource

The work is being undertaken within existing resources.

6. Impact Assessment

We expect this plan to have a positive effect on the Authority's ability to promote diversity. There may be some additional implications for the regulators in supplying information for our section 29 work and for accredited registers applying for or renewing accreditation. We consider that this is essential to help the Authority assess the impact of its own work.

7. EDI implications

We believe that the plan will significantly improve the Authority's work in support of EDI.

8. Timescale

The action plan is for the financial year 2022/23 but there will be further plans for future years building on this plan.

9. Communications

We have announced the plan to colleagues and to external stakeholders. Part of the plan includes communications around particular events and areas of work throughout the year.

10. Internal Stakeholders

All colleagues at the Authority are involved in this work.

11. External Stakeholders

The regulators, registrant and patient and service user groups are all crucial to this work and we will engage with them as part of it.

12. Annexes List

EDI action plan tracker

EDI ACTION PLAN TRACKER

Key Outcomes:

	Area/Owner	Action	Completion Date	Risks	Action to date	RAG rating
1	Corp Serv	Diversity data on the makeup of our workforce to be collated and used to identify and implement key actions to address under-representation.	31 Dec 2022			
2	Corp Serv	Internal HR policies fully analysed and revised to prioritise EDI.	31 March 2023			
3	HR	Mandatory training will be developed and provided to everyone in our organisation involving people who have protected characteristics and have experience of what it is like to live with those and in order to inform our decision-making.	31 Dec 2022			
4	S&Q	We will work with the regulators to gain diversity information about the registrants involved in our section 29 cases so that we can identify concerns about decision-	31 Dec 2022			

		making and action to address them.				
5	S&Q	We will have reviewed our approach to Standard 3 of our Standards of Good Regulation to ensure we are using our performance review to influence the way EDI is embedded in regulation as effectively as possible.	31 Jan 2023			
6	Corp Serv S&P S&Q	An Advisory Panel comprising individuals who represent the diversity of characteristics and perspectives to support and inform our work will be established.	31 March 2023			
7	All	Equality Impact Assessments will be embedded as part of our risk management process so that all policies, strategies and decisions include a consideration of EDI.	30 Sept 2022			
8	HR	We will develop and implement a work experience scheme to enable students from under-represented groups to gain	31 Oct 2022			

		experience of the Authority's work.				
9	S&P	Our communication and information on EDI internally and externally through the website will be reviewed and improved.	31 July 2022 and ongoing			
10	S&P	Develop a programme for celebrating the strength diversity brings to our organisation and the health and social care profession by marking cultural and other key national EDI events.	31 May 2022			
11	Corp Serv	An Associate non-executive Board member will be recruited.	30 April 2022		Complete	

- 1. We will develop our capability so that we have the knowledge and understanding to lead by example in creating an empowering and inclusive culture and promote diversity in our decision-making.**

	Area/Owner	Action	Proposed date	Risks	Action to date	RAG rating
1.1	HR with support from EDI Advisor	Equip the HR team with the knowledge and understanding on the importance of diversity monitoring.	30 April 2022			

1.2	HR, EDI adviser and all teams	Provide and participate in training on various aspects of EDI to gain knowledge and an understanding of the issues and concerns experienced by groups who share protected characteristics.	15 April 2022 Role specific training sourced – June 22			
1.3	All	All staff will have an objective in respect of EDI to carry forward this action plan.	End April 2022			
1.4	Section 29 team	1. Establish a system to enable us to record information about registrants' protected characteristics. 2. Seek information about those characteristics from the regulators. 3. Analyse the information that we receive annually to establish any learning in respect of our own processes and decisions at all stages of the process.	CRM to be modified and information requested from regulators by 30 June 2022. Data to be analysed by 1 January 2023 and report prepared for the Scrutiny Committee.			
1.5	HR and EDI adviser	Work experience scheme established to enable students from under-represented groups to gain experience of the Authority's work.	31 October 2022			

1.6	S&Q and S&P teams and EDI adviser	<p>Train relevant teams on undertaking equality impact assessments.</p> <p>Identify key projects which will be subject to an EIA screening process and/or full EIA.</p>	<p>Team to have completed training with EDI adviser by 30 April 2022.</p> <p>30 Sept 2022</p>			
1.7	AR team	Embed new impact assessment into the assessment and decision-making processes.	<p>Monitoring system in place for actions arising from IA.</p> <p>Feedback from registers and decision makers sought.</p> <p>Updated guidance on carrying out impact assessments for team and decision makers.</p> <p>By 31 Dec 2022.</p>			
1.8	Policy team	Embed EDI considerations into policy work planning and prioritising.	2022-23 work planning incorporates EDI work as standalone project and/or as part of other projects.			
1.9	Policy team	Review our stakeholder mapping and ensure that we	Stakeholder management arrangements will be in			

		are engaging with/hearing from a sufficiently diverse range of stakeholders to support our work.	place for stakeholders who provide EDI insights and expertise as well as for additional bodies within existing stakeholder groups (registrant bodies and patient groups) who represent or reflect the views of diverse groups. 31 December 2022.			
1.10	S&Q and Policy	Establish an Advisory Panel comprising of key individuals who represent the diversity of characteristics and perspectives to support and inform our work.	Work to develop the approach from April 2022 and panel established no later than 31 March 2023.			
1.11	ICT	To identify relevant training for the ICT team on Accessibility software and other Assistive technologies.	30 May 2022			
1.12	Finance	Compare all our Finance and Procurement policies to the ones of regulators to pick up the best practice for accessibility and inclusivity.	February 2023			

2. We will promote an inclusive workplace culture where everyone feels empowered, engaged and valued.

	Area/Owner	Action	Proposed date	Risks	Action to date	RAG rating
2.1	HR	Agree and roll out a new system for collecting and collating EDI data in a useable way including identifying whether a new monitoring system is required.	30 April 2022			
2.2	HR	Identify training for the HR team in managing workforce information particularly around using EDI data and identifying trends.	30 May 2022			
2.3	HR	A general HR policy review to ensure that the Employee Handbook is legally up to date including people policies. Use this annual review to identify specific policies which should be reviewed.	31 March 2023 30 Sept 2022 for specific policy reviews to be complete.			
2.4	HR	Continue to monitor the changes to the recruitment process and use the learnings from each process (such as advertising in new places and assessing the interest) and the diversity of applicants. Identify key actions to improve diversity of the workforce.	First review and amended policy in place by end of 30 June 2022 with quarterly reviews for the remainder of the year to continue to assess what is working.			
2.5	HR	Review the Authority's approach to flexible working to ensure it	31 August 2022			

		supports a culture promoting EDI.				
2.6	Policy and Comms teams	Develop a policy for taking into account EDI considerations when designing research specifications and procurement for Comms projects.	Policy discussed with EDI adviser and in place by 31 May 2022. Ongoing.			
2.7	HR	Review the induction process to ensure that it is inclusive and embodies the culture of the Authority. This will include a session on EDI for all new starters focus on embedding the organisational values and an EDI culture.	31 December 2022			
2.8	Corporate Services	Review public facing policies such as Corporate Complaints, FOI and the Individual Rights policies to ensure that they are easily accessible and inclusive.	31 March 2023			
2.9	ICT	Review all ICT policies to check they are inclusive and make specific reference to our commitment to provide ICT kit based on user requirements where possible.	31 March 2022 for the review and identification September 2022 for specific policy reviews to be completed.			
2.10	ICT	Test the accessibility of all current Authority software applications and web services that staff access. Corporate website accessibility will be managed by hosting company with new tender in 2022.	30 September 2022			
2.11	Comms and EDI advisor	Review our comms policies (which are currently being drafted) to check they	30 June 2022			

		include information/guidance on EDI and are EDI compliant (accessibility) and plain English.				
2.1 2	Comms	Develop accessibility guidelines for publications and website. Produce a guide to inclusive language and/or writing for screen readers.	30 September 2022			
2.1 3	HR /Health and Safety	A policy update to include regular risk assessments for staff workstation safety so that we are aware of user requirements throughout employment.	30 June 2022			
2.1 4	ICT	Revise new starter process to identify any accessibility needs so that the ICT team can prepare equipment in advance.	31 December 2022			
2.1 5	Finance	Review procurement policies and forms to ensure that they are accessible and attract a diversity of suppliers.	31 December 2022			
2.1 6	Finance	Review finance induction for staff to ensure it is accessible and inclusive.	31 July 2022			
2.1 7	Policy and CS teams	Work with Corporate Services (and other teams) to integrate EDI prompts/screening/checkpoints into project management materials to ensure fit for purpose for policy work.	Project management materials updated with necessary prompts for EDI by 30 September 2022.			
2.1 8	Comms	Prepare annual editorial calendar of key dates/events and the actions likely to be involved. These actions may include: <ul style="list-style-type: none"> • Statements on twitter, email footers etc. expressing the Authority's awareness 	Calendar approved by Director of Standards and Policy by 31 May 2022.			

		<p>and support for the event</p> <ul style="list-style-type: none"> • Internal Authority events and communications associated with the event • Joint work with the regulators <p>Blogs and other external facing work for events that fit with the Authority's work.</p>				
2.19	Comms	Review our content and imagery in our publications to ensure that they are culturally sensitive and review existing blog guidance.	31 May 2022.			
2.20	HR/H&S	To review the risk assessment processes to ensure that EDI factors can be identified, and action taken to support individual needs.	30 June 2022			
2.21	HR	Disability Confident level 2 accreditation.	31 March 2023			

3. We will use our influence to encourage the promotion and progression of EDI across health and social care regulators and accredited registers.

	Area/Owner	Action	Proposed date	Risks	Action to date	RAG rating
3.1	s.29 team	Identify issues in the cases we review which suggest concerns about bias or inappropriate treatment arising out protected characteristics or different socio-economic backgrounds. Pro-actively identify these through the learning points process and decide whether they are best dealt with through direct	<p>Ongoing.</p> <p>Report to be prepared for Scrutiny Committee in 2023.</p>			

		<p>contact with the regulators, liaison with the performance review team and/or flagging with the policy team. The action may depend on whether the issue is something which arises out of an individual case, or more systemic problems within an individual regulator or across the regulatory or health and social care system.</p>				
3.2	PR team	<p>Review the areas we look at as part of the PR EDI Standard (Standard 3) to ensure this is focused appropriately. As part of this, we will:</p> <ul style="list-style-type: none"> a. Review the information we hold across the regulators b. Review the information collected by other similar schemes <p>Determine the information we should collect (including any through the dataset) and compare this to the information we currently hold.</p>	<p>Analysis produced of the information we hold and have considered against Standard 3 in the first two years of its use (by 30 June 2022).</p> <p>Overview of information collected by other similar schemes produced (by 31 August 2022).</p> <p>Review EDI information for the dataset and identify changes needed.</p>			

			Update Evidence matrix. Complete by 30 November 2022			
3.3	PR team	<p>Clarify our expectations relating to EDI Standard, including whether the baseline should increase over time.</p> <p>c. In the light of the review, consider the wording of the Standard to ensure that it accurately encapsulates what we seek to achieve.</p>	<p>By 31 December 2022: Guidance produced for PR team, decision-makers and regulators on the expectations and requirements to meet the Standard.</p> <p>Report produced on whether the baseline should increase over time, and if so, how this should be introduced.</p> <p>By end March 2023: Initial engagement with internal and external stakeholders on the wording of the Standard.</p> <p>Further development and consultation on wording to</p>			

			take place in 2023/24.			
3.4	AR team	Embed new impact assessment into the assessment and decision-making processes.				
3.5	AR team	Develop an EDI Standard for the Accreditation Standards. Consider what data we need to capture from the Accredited Registers as part of this.	<p>A template data set that Accredited Registers are required to complete as part of their full assessment.</p> <p>Updated standards developed following public consultation.</p> <p>Updated guidance documents for registers.</p> <p>By 31 March 2023.</p>			
3.6	AR team	Develop communication with Accredited Registers to raise the profile of EDI. This should include consideration of an EDI Forum and sharing relevant good practice guidance.	<p>Section in the AR newsletter.</p> <p>EDI included in any good practice guidance published.</p> <p>Development of an EDI Forum for Accredited Registers.</p> <p>By 31 January 2023.</p>			
3.7	PR and AR teams	Review stakeholder	Target list of stakeholders			

		engagement, including 'Share your experience' process to ensure it is better targeted to service users of regulators.	<p>for each regulator developed, based on understanding of key groups (by 30 June 2022).</p> <p>Updated process for obtaining stakeholder feedback (by 30 June 2022).</p> <p>Set of escalation criteria for identifying serious concerns, to include those relating to discrimination (by 31 March 2023).</p>			
3.8	PR and AR teams	Review the accessibility of the Performance review and Accredited Register reports and other public reports.	<p>New report formats introduced for new PR approach (by 30 June 2022).</p> <p>Updated website content that is available in other formats on request.</p> <p>Feasibility assessment of introducing animated videos to explain the outcomes of performance reviews for each regulator</p>			

			(by 30 September 2022). Published 'easy read' versions of key documents (by 31 March 2023).			
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