

Professional Standards Authority for Health and Social Care

Equality, Diversity and Inclusion action plan: 2022-2023

Our role and purpose

The Professional Standards Authority is the oversight body for 10 health and social care regulators and almost 30 accredited registers. The Authority has four key functions.

1. We drive improvements in the 10 statutory regulators in health and social care by undertaking annual reviews of effectiveness.
2. We provide a safety net for any fitness to practise decisions that are insufficient to protect the public.
3. We raise standards in health and social care professionals in non-statutory roles through our accredited registers programme.
4. We use research and policy development to improve regulation and registration to better protect patients, service users and the public.

As an oversight body, the Authority is in an influential position to encourage regulators and accredited registers to promote and progress equality, diversity, and inclusion (EDI) in delivering their regulatory obligations.

Why EDI matters to the Authority

Treating everyone fairly is a core value of the Authority. It is obviously the right thing to do. The professions and registers we oversee are themselves diverse and have a core duty to act in the best interests of all patients and service users. These are from diverse backgrounds with diverse needs. So it is essential that we have the insight and ability to support diversity among our people, those we oversee and among registrants, patients and service users.

Being an organisation with a diverse workforce brings many advantages such as greater creativity, stronger governance and better decision-making.

In addition, the Authority, as a public authority under the **Equality Act 2010**, is **subject to the public sector equality duty**. This duty requires the Authority in carrying out its functions to have due regard or think about the need to:

- eliminate unlawful discrimination
- advance equality of opportunity between people who share a protected characteristic and those who do not
- foster or encourage good relations between people who share a protected characteristic and those who do not.

This means that the Authority must proactively consider how it promotes equality and addresses inequalities and/or disadvantage within the organisation and in relation to those protected under the Equality Act. It must also promote equality and consider and

address inequalities in carrying out its external role as the oversight regulator within the Health and Social Care Sector.

Background

The murder of George Floyd and the associated Black Lives Matter movement brought into focus the fact that society and organisations still have a long way to go in addressing systemic racial inequalities. The pandemic has further exposed inequalities in relation to race, sex, disability, and socio-economic status, as has the murder of Sarah Everard. The Authority is not unique in facing challenges in relation to its approach and track record on EDI.

In November 2020, we commissioned an audit to gain feedback from our staff and external stakeholders on EDI to identify areas for improvement. The audit included an assessment of how we were perceived by regulators. It identified key strengths, including the commitment of the leadership and staff to EDI and the work we had already done to encourage regulators to consider EDI as part of their obligations.

The audit also showed that, while the Authority has a commitment to EDI, it still has some way to go in making sure that every employee feels included and able to get their voice heard. Regarding its external role, the organisation was seen by its regulatory community to be lacking credibility on EDI due to its lack of visibility on these issues in the past. The Authority therefore needs to improve its performance in this critical area to demonstrate its commitment to EDI in spirit and in practice.

The audit highlighted the following areas for further work and development:

- Culture
- Leadership Development
- Diversity profile of the Authority
- Staff Development
- Policy development and EIAs
- EDI Communication and Messaging
- EDI in regulation and the role of the Authority.

Introduction

This is our first EDI action plan, covering 2022-2023. It sets out how we will embed EDI both as an employer and in our role as the oversight body for the health and social care sector. Many of the actions in it will lead to further work in the years beyond.

Our vision is to:

Live our values and foster a culture where all our people feel included and are empowered to achieve their best, where we welcome and celebrate diversity, where inequalities and unfair treatment are called out and addressed and, where we set the example for what good looks like for all those we interact with internally and externally.

Every member of the Authority, has a role to play in delivering this strategy and displaying the behaviours we expect:

- Our Board and Committees approve our approach and this action plan and oversee how it is carried out
- Our leaders and managers provide the direction and leadership in delivering the strategy and action plan
- Our EDI group are champions of the strategy
- Every member of staff will carry forward the work and values every day.

What we will do to embed EDI into how we work and deliver our business

We will be an employer that demonstrably values and welcomes diversity of ideas, skills, behaviours, and experiences. We will engender a culture of inclusion and which promotes wellbeing and provides support to enable all our colleagues to thrive and achieve their full potential.

We will ensure that our values of integrity, respect, fairness, transparency, and teamwork are visible in the way we work with and treat each other and in our interactions with our partners, our regulatory community and patients and service users. Every member of the Authority will have an objective related to EDI for 2022/23. We collectively have a responsibility for creating an inclusive culture and promoting EDI.

We will work with stakeholders and use our oversight role to influence health and social care regulators' and accredited registers' approaches to EDI to:

- Ensure regulators and registers equip their registrants with the skill and knowledge they need to deliver services and care according to the needs of individuals from all backgrounds and abilities
- promote fair and equal treatment by registrants to all patients, service users and colleagues
- promote fair and equal treatment of registrants by regulators and registers.

We have developed three objectives that will give a focus to our work on EDI. These objectives are supported by our action plan with clear accountability and timescales for delivery. Each of our Directorates will develop their own action plan to support the delivery of the plan.

Review, reporting and governance

We will conduct an annual survey of staff and stakeholders to gain feedback about how we are doing and whether we are delivering our EDI vision and living our values. This annual check will enable us to listen to how others perceive us, and these insights will help us continue to improve and move forward.

Progress on the actions will be reviewed:

- Monthly by Directors Group (DG) and the EDI group
- At each meeting by the Finance, Nominations and Scrutiny Committees in respect of the actions falling within their remits
- At each meeting of the Board.

We will publish an annual report on the progress we have made in delivering this and future action plans. The first of these will be published in April 2023.

Our Objectives for 2022-2023

We have set three objectives to help us to deliver our vision of becoming an EDI exemplar internally and externally. In setting these objectives we have sought to ensure alignment with our organisational strategic aims so that we embed EDI into the way we think, work and interact with our people and others and make decisions.

Our objectives are:

- **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 promoting diversity in our decision-making**
- **We will promote an inclusive workplace culture where everyone feels empowered, engaged and valued**
- **We will use our influence to encourage the promotion and progression of EDI across health and social care regulators and accredited registers.**

Action Plan – March 2022 – January 2023

The key **Outcomes** that we expect to achieve this year are:

- Diversity data on the makeup of our workforce will be collated and used to identify and implement key actions to address under-representation by 31 December 2022.
- Internal HR policies will have been fully analysed and revised to prioritise EDI by 31 March 2023.
- 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.
- 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-making and action to address them by 31 December 2022.
- 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 by January 2023.
- An Advisory Panel comprising individuals who represent the diversity of characteristics and perspectives to support and inform our work will be established no later than 31 March 2022.

- 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 by 30 September 2022.
- We will develop and implement a work experience scheme to enable students from under-represented groups to gain experience of the Authority's work by 31 October 2022.
- An Associate non-executive Board member will be recruited by May 2022.
- Our communication and information on EDI internally and externally through the website will be reviewed and improved by 31 July 2022 and continuing thereafter.
- We will have developed 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 by 31 May 2022.

The action plans below set out the detail of our plans for this year in respect of each of the three objectives.

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.

	Owner	Action	Timescale
1.1	HR with support from EDI Advisor	Equip the HR team with knowledge and understanding of diversity monitoring.	30 April 2022
1.2	HR, EDI adviser and all teams	Provide and participate in training on EDI to gain knowledge and an understanding of the issues and concerns experienced by groups who share protected characteristics.	From April 2022
1.3	All	All staff will have an objective in respect of EDI to carry forward this action plan.	30 April 2022
1.4	s.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	Train relevant teams on undertaking equality impact assessments.	Team to have completed training with EDI adviser by 30 April 2022.

	and EDI adviser	Identify key projects which will be subject to an EIA screening process and/or full EIA.	30 Sept 2022
1.7	AR team	Embed new impact assessment into the assessment and decision-making processes.	Monitoring system in place for actions arising from IA. Feedback from registers and decision makers sought. Updated guidance on carrying out impact assessments for team and decision makers. By 31 Dec 2022.
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 are engaging with/hearing from a sufficiently diverse range of stakeholders to support our work.	Stakeholder management arrangements will be in 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	Identify relevant training for the ICT team on Accessibility software and other Assistive technologies.	31 May 2022
1.12	Finance	Compare all our Finance and Procurement policies to those of the regulators to pick up the best practice for accessibility and inclusivity.	28 February 2023

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

	Owner	Action	Timescale
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 supports a culture promoting EDI.	31 August 2022
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	30 September 2022

		staff access. Corporate website accessibility will be managed by hosting company with new tender in 2022.	
2.11	Comms and EDI advisor	Review our comms policies (which are currently being drafted) to check they include information/guidance on EDI and are EDI compliant (accessibility) and plain English.	30 June 2022
2.12	Comms	Develop accessibility guidelines for publications and website. Produce a guide to inclusive language and/or writing for screen readers.	30 September 2022
2.13	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
2.14	ICT	Revise new starter process to identify any accessibility needs so that the ICT team can prepare equipment in advance.	31 December 2022
2.15	Finance	Review procurement policies and forms to ensure that they are accessible and attract a diversity of suppliers.	31 December 2022
2.16	Finance	Review finance induction for staff to ensure it is accessible and inclusive.	31 July 2022
2.17	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.
2.18	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 and support for the event • Internal Authority events and communications associated with the event • Joint work with the regulators • Blogs and other external facing work for events that fit with the Authority's work. 	Calendar approved by Director of Standards and Policy by 31 May 2022.
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,	30 June 2022

		and action taken to support individual needs.	
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.

	Owner	Action	Timescale
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 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.	Ongoing. Report to be prepared for Scrutiny Committee in 2023.
3.2	PR team	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: <ul style="list-style-type: none"> a. Review the information we hold across the regulators b. Review the information collected by other similar schemes c. Determine the information we should collect (including any through the dataset) and compare this to the information we currently hold. 	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). Overview of information collected by other similar schemes produced (by 31 August 2022). Review EDI information for the dataset and identify changes needed. Update Evidence matrix. Complete by 30 November 2022
3.3	PR team	Clarify our expectations relating to EDI Standard, including whether the baseline should increase over time.	By 31 December 2022: Guidance produced for PR team, decision-makers and

		In the light of the review, consider the wording of the Standard to ensure that it accurately encapsulates what we seek to achieve.	<p>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 take place in 2023/24.</p>
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 engagement, including 'Share your experience' process to ensure it is better targeted to service users of regulators.	<p>Target list of stakeholders 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 (by 30 September 2022).</p> <p>Published 'easy read' versions of key documents (by 31 March 2023).</p>