

Finance and Resources Committee 19 June 2008

Equality and Diversity Scheme – Human Resources Employee and Partner Actions

Executive summary and recommendations

Introduction

As part of the overall HPC Equality and Diversity Scheme, there are a number of recent, existing and ongoing practices, as well as action points for the future that the human resources and partner departments are required to undertake. As part of the project, it was agreed that human resources would provide an update to the Finance and Resources Committee on their specific area by July 2008.

As notified to the Committee in the 2008/2009 workplan, some of the actions were delayed largely due to the work on the new pension scheme in 2007. However all actions will be completed in the first year of the scheme and therefore will be included in the yearly progress update on the scheme to be submitted to Council after 1 January 2009. The department’s progress with the HR parts of the project are tabled below:

Recent, existing and ongoing practice	HR Initiatives
1. We have taken steps to ensure that our selection process is fair and free from discrimination by ensuring that interview panels do not have access to personal information when shortlisting.	All job applicants for both partner and employee vacancies are asked to complete a personal details form and a voluntary equal opportunities monitoring form. However upon receipt of the application in the human resources or partner department, this personal information is detached so that the panel selecting candidates for interview does not have access to information such as name, address, date of birth, disability or nationality; thus reducing the risk of discrimination in shortlisting.
2. We have completed a review of our employee handbook to ensure that equality and diversity legislation is accounted for prior to publication of the	This review was completed by February 2008 following a six week consultation period of employees and also a review of the handbook by our

scheme.	equality and diversity internal working group.
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Action Points	HR Initiatives
1. We will implement a rolling programme of reviewing HR policies on a regular basis, in consultation with the equality and diversity internal working group, middle management group and employees.	(Timeframe – ongoing) This has commenced with the first review having taken place between November 2007 and February 2008. The next review will take place in the same period one year later.
2. We will review our practices around employment of disabled employees, particularly around adjustments following a recruitment decision, in consultation with employees.	(Timeframe – part of the above) The predominantly applicable policies in the employee handbook (Recruitment Policy and Diversity Policy) were reviewed as detailed above. Other policies that reference disability outside of the recruitment context were also reviewed such as the Capability, Grievance, and Dismissal and Disciplinary Policies and Procedures which contain provisions for the fair and equitable treatment of employees with a disability.
3. As part of the Information and Consultation of Employees Regulations 2004 (ICE), we will recruit employee representatives drawn from the diversity of the employee population. They will act as a link between HR and employees.	(Timeframe – July 2008) Whilst our work on the ICE regulations is still to be completed, members of the internal equality and diversity working group were recruited in August 2007. This group has been meeting regularly to discuss issues and make recommendations to the departments who have referred issues to them since their inception. It is composed of nine employees who have volunteered to be on the group and represents a range of departments with a great diversity in areas such as age, disability and ethnicity. Once comprehensive work has been undertaken on the ICE regulations, consideration will be given as to how the equality and diversity working group feeds into the separate employee representative consultation group.
4. We will conduct an employee attitude survey to find out what our employees like and dislike about HR practices in the organisation.	(Timeframe – April 2008) Following the original planned date of completion published in the scheme,

	<p>this date was changed to be incorporated into the 2008/2009 workplan with a deadline of October 2008 for the final analysis and July/August for the actual survey. This delay was because other more urgent priorities in the workplan had to take precedence (recruitment of new positions approved in the budget, and work on the ICE regulations).</p>
<p>5. We will explore the feasibility of working towards obtaining the 'two ticks' symbol which denotes organisations that are positive about disability.</p>	<p>(Timeframe – To end of 2010)</p> <p>This will be undertaken as part of the 2009/2010 HR workplan.</p>
<p>6. We will review the complaints and appeals processes for partners, including updating the guidance for appeals panel members to include guidance on equality and diversity issues relevant to their role.</p>	<p>(Timeframe – April 2008)</p> <p>The complaints and appeals process (along with other relevant policies such as the Code of Conduct) was reviewed as part of the rollout of the new Partner Handbook which was approved by the Finance and Resources Committee in September 2007. This incorporated clauses guiding partners on equality and diversity matters.</p> <p>Instead of updating the guidance for appeals panel members only, it was agreed that a more comprehensive approach would be more beneficial. Therefore equal treatment for practice notes were developed for all Fitness to Practise partners and were approved by the relevant Fitness to Practise Committees.</p>
<p>7. We will analyse and monitor the data we collect for human resources purposes and produce a report each year for our finance and resources committee.</p>	<p>(Timeframe – November 2007 and ongoing)</p> <p>This was delayed until June 2008 due to the reason outlined earlier (however this was approved by the project team as will still be completed within the first year of the scheme). We will analyse and monitor the data we collect for human resources purposes and produce a report each year for our finance and resources committee. The first of these annual updates is attached in Appendix 1.</p>

Finally, under the actions required for all departments, one states that “we will begin a rolling programme of training for all employees, partners and council members on equality and diversity issues”. The Human Resources Department have organised this training for all of the above groups. There is a rolling programme for new employees, and at all new partner training and partner refresher training (where partners have not previously received training at the HPC on diversity so far) there is a section covering equality and diversity.

It should be noted that in addition to the specific actions outlined above, most of the general policies under the Scheme (Race Equality Policy, Disability Equality Policy, Gender and Sexual Equality Policy, Religion and Belief Equality Policy, and Age Equality Policy) contain provisions which are already contained within the Employee Handbook policies, which the Committee has already approved and are therefore not attached in this paper.

As part of this update it is proposed that an updated and revised voluntary equal opportunities and monitoring form is used for partners and employees to include aspects such as religion, sexual orientation, transgender, and greater detail around type of disability. This will provide a more detailed and comprehensive overview of employee and partner statistics. To ensure that these statistics are recorded, the human resources database Professional Personnel will need to be adjusted and developed with new categories. This should take approximately three to four months.

Decision

The Council/Committee is asked to:

- Note the human resources action points and action taken to date; and
- Approve the introduction of a revised equality and diversity monitoring form for partners and employees.

Background information

The Equality and Diversity Scheme including human resources actions was approved by Council in December 2007.

Resource implications

Time taken to undertake the required actions has been factored into the Human Resources Workplan for 2008/2009.

Financial implications

The financial impact of ongoing training for new employees and partners, and for partner refresher training has been accounted for the 2008/2009 human resources and partners budgets. There will be financial implications of database amendments and these were also anticipated and accounted for in the budget.

Appendices

Appendix 1 – Data Collected for Human Resources Purposes 2007/2008

Appendix 2 – Equal Opportunities Monitoring Form (completed by applicants for employee vacancies. The same form is used for partners with the word partners substituted for employees).

Appendix 3 - New Proposed Equal Opportunities Monitoring Form

Appendix 4 - Equality and Diversity Scheme

Date of paper

5 June 2008

Appendix 1: Data Collected for Human Resources Purposes 2007/2008

1.0 Employees

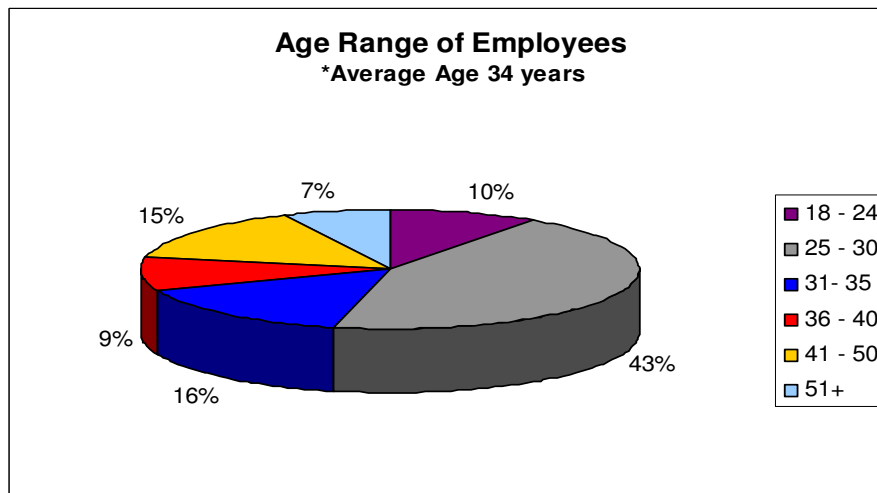
Employee data is collected through two mechanisms:

- the voluntary equal opportunities monitoring form that job applicants have the opportunity to complete if they choose to do so; and
- after employees are appointed and commence employment with the HPC, they have the opportunity to enter or update their own details electronically through the human resources information/intranet system (HRinfo).

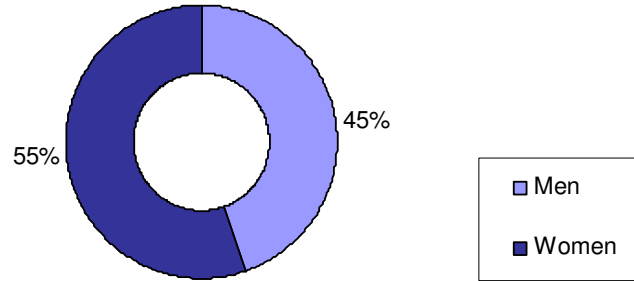
Data on all employees appointed to posts within the HPC has been collected and recorded for the past five years, however, data collected in the system from all job applicants has been recorded on the system for one year only (since March 2007).

Initially the project team for the Equality and Diversity Scheme considered whether advertising mechanisms for both employee and partner vacancies needed to be widened or diversified. However it was decided that a wide variety of publications and various mechanisms (websites, newspapers, professional journals) are all used and therefore no changes were proposed to the current methods of advertising.

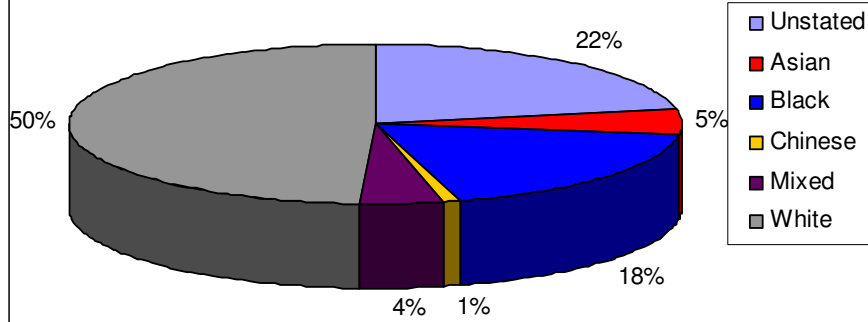
There are currently 114 employees working at the HPC. Graphs reflecting the employee statistics at 1 May 2008 and employee recruitment statistics (based on 657 job applicants who applied for jobs and only some of which filled in the voluntary monitoring) for the previous financial year are detailed below:



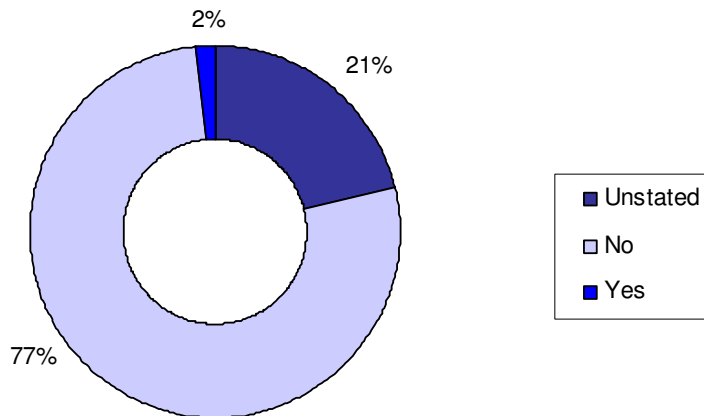
Percentage Ratio of Male and Female Employees

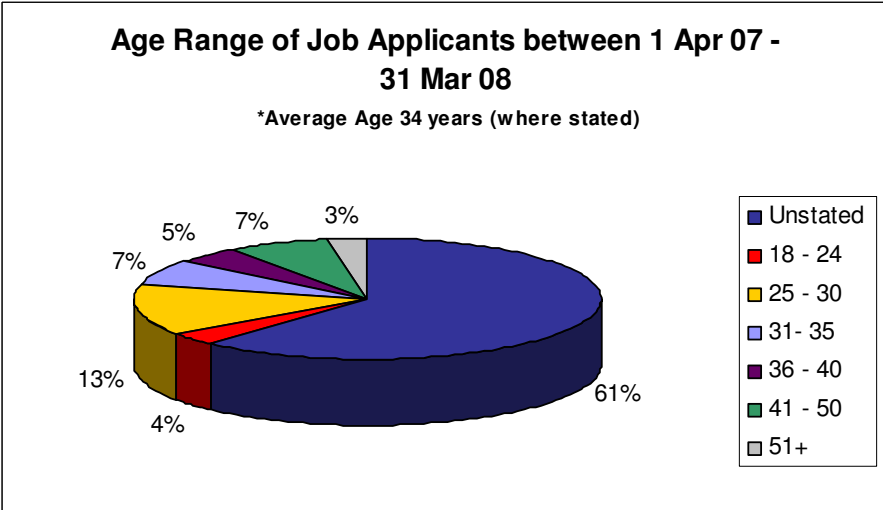
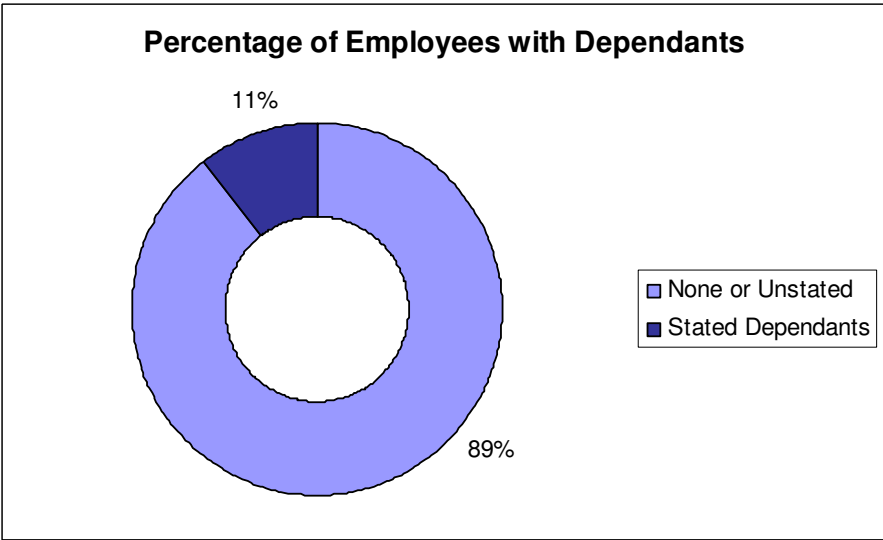
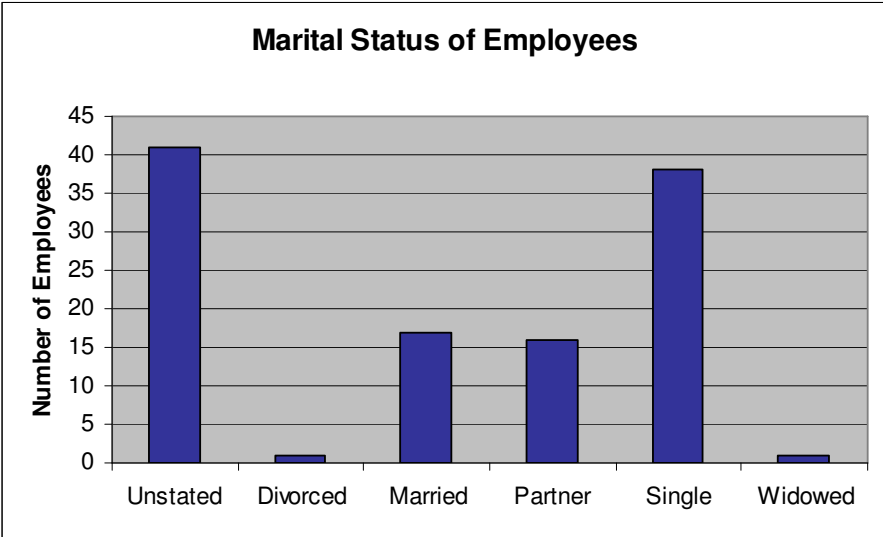


Ethnic Backgrounds of Employees

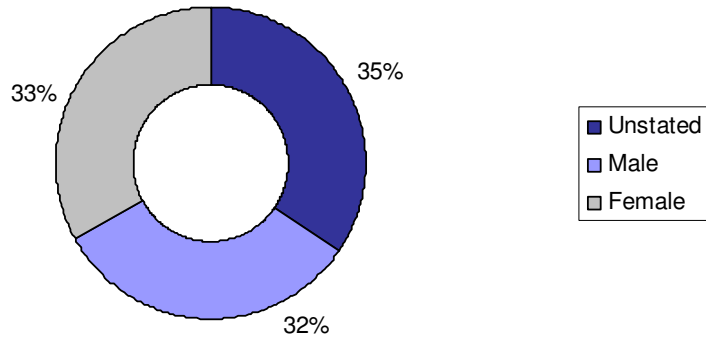


Employees with a Disability

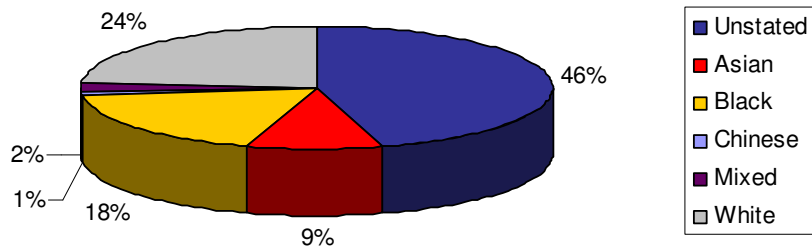




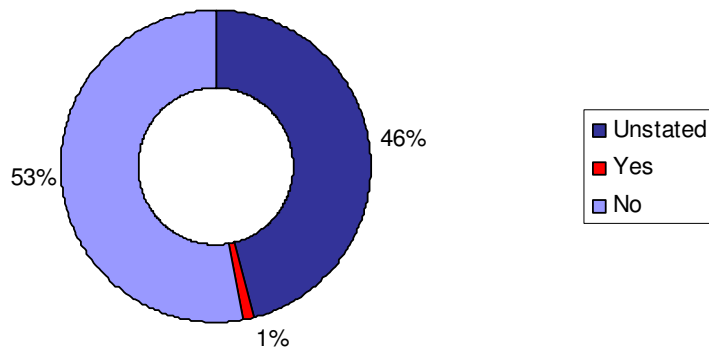
Gender Ratio of Job Applicants between 01 Apr 07 - 31 Mar 08

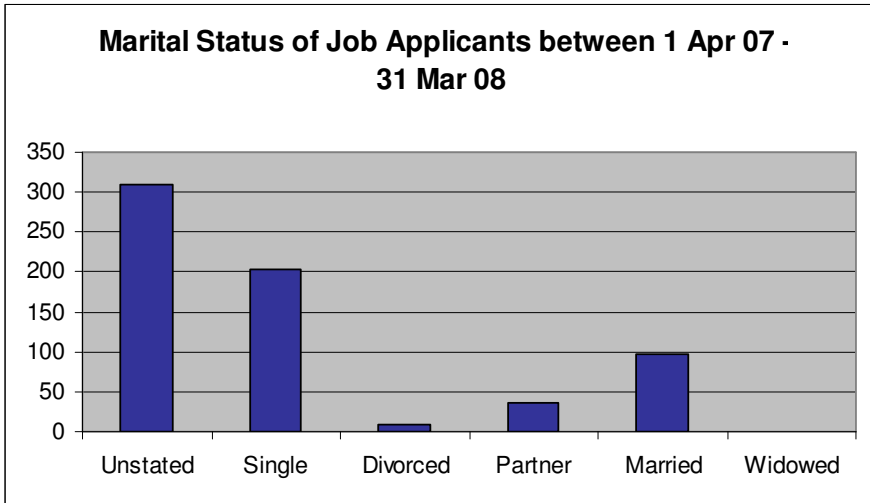


Ethnic Background of Job Applicants between 1 Apr 07 - 31 Mar 08



Percentage of Job Applicants between 1 Apr 07 - 31 Mar 08 with a Disability

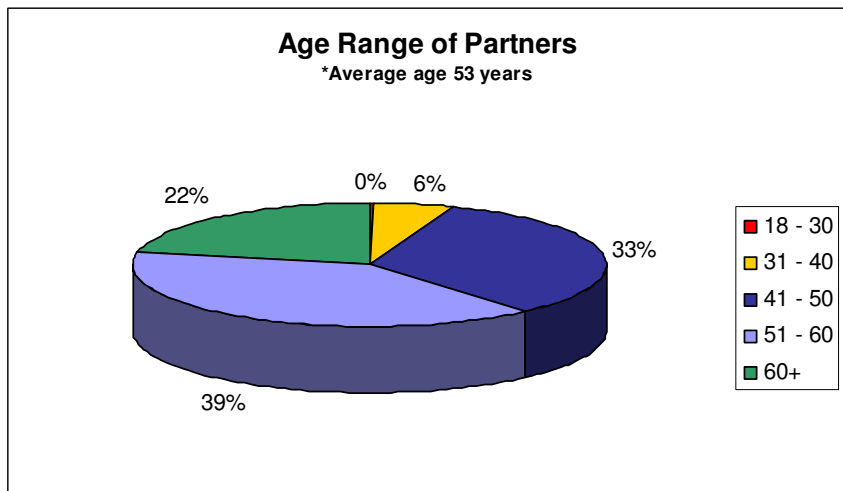




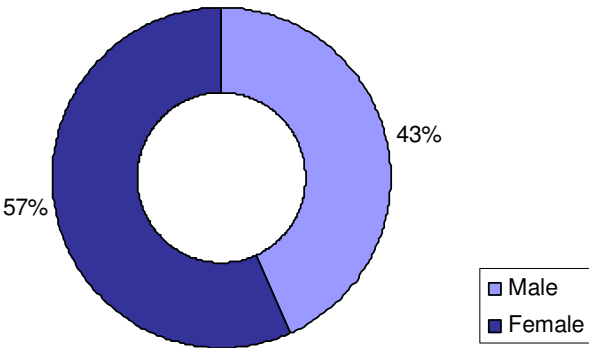
2.0 Partners

In 2006 a mail-out was sent to all existing partners asking them to complete a voluntary equal opportunities monitoring form. All new partners are also given the opportunity to complete the forms. It is only this financial year that the recording mechanism in Professional Personnel has been developed in the partner section and employees trained to record the data from applicants for partner roles. Therefore these statistics will be presented for 2008/2009 to the Committee next financial year.

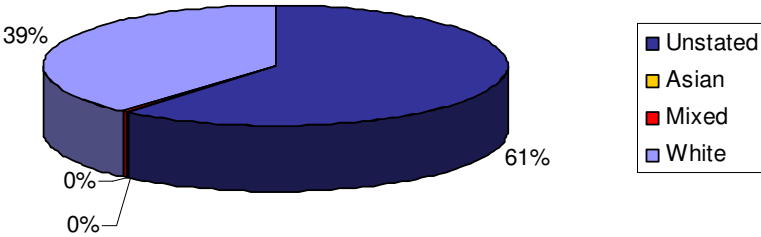
Graphs reflecting the current partner statistics are below:



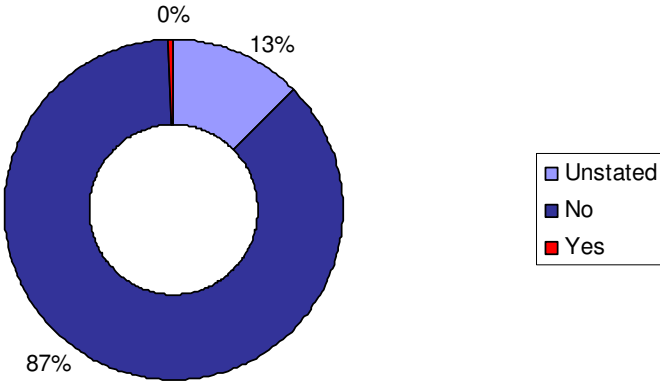
Percentage Ratio of Male and Female Partners

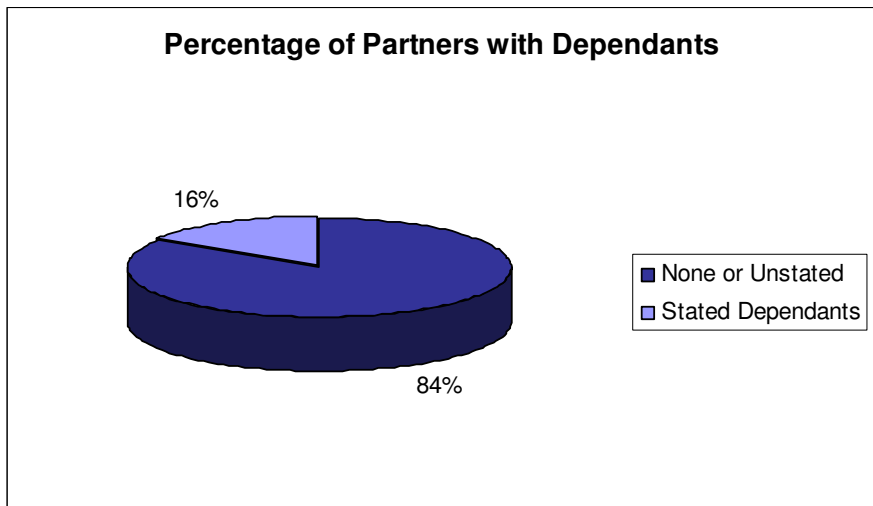
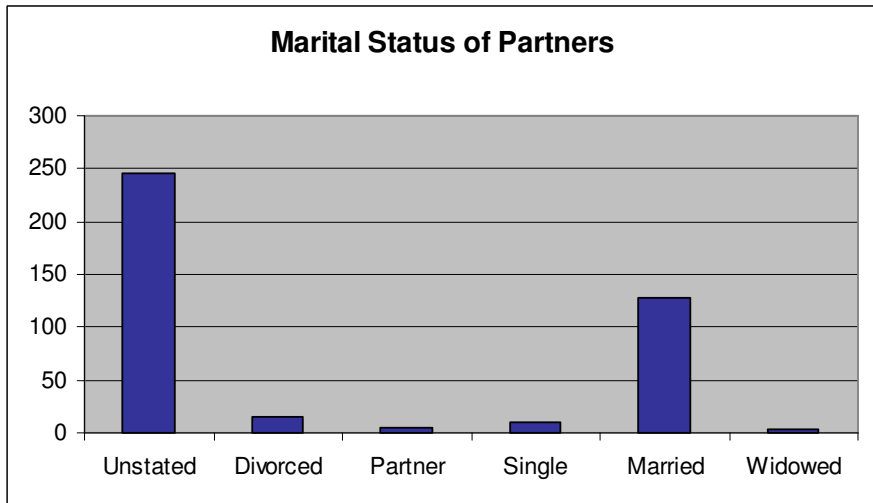


Ethnic Backgrounds of Partners



Partners with a Disability





3.0 Comparative Data

The report this year does not include comparative data of HPC employee and partner statistics to general UK population statistics, as it was felt that the HR Department is already following good practice in terms of its recruitment and selection methods, and that comparative data would not result in a change to the ongoing actions of the HR Department in this area. However the Committee may wish to consider a recommendation to the Executive that next year in the annual equality and diversity report from HR, the statistics of the employees are compared against those of the general population, should there be perceived benefits from such an analysis.

Appendix 2 – Voluntary Equal Opportunities Monitoring Form

Equal Opportunity & Diversity Monitoring Form

HPC is working towards equality of opportunity in employment. We would like to be able to report on the profile of HPC prospective/actual employees in terms of gender, age, disability, job type, marital status, ethnicity and caring responsibilities.

To help us achieve our aim, please complete the following sections. The information you give will be used for statistical monitoring purposes only.

You are not obligated to complete this form, though we hope you will do so. Please tick the appropriate.

Gender	Male <input type="checkbox"/>	Female <input type="checkbox"/>
Age	Up to 18 years <input type="checkbox"/>	46-55 years <input type="checkbox"/>
	19-25 years <input type="checkbox"/>	56-60 years <input type="checkbox"/>
	26-35 years <input type="checkbox"/>	over 60 <input type="checkbox"/>
	36-45 years <input type="checkbox"/>	
Date of Birth		
Marital Status	Single <input type="checkbox"/>	Widowed <input type="checkbox"/>
	Married <input type="checkbox"/>	Partner <input type="checkbox"/>
	Divorced <input type="checkbox"/>	
Do you have dependant children?	No <input type="checkbox"/>	Yes <input type="checkbox"/>
	If yes, please indicate number: _____	
Do you have a disability?	No <input type="checkbox"/>	Yes <input type="checkbox"/>

NATIONALITY & ETHNIC ORIGIN

What race or ethnicity do you consider yourself?

Choose ONE section from A to E, and then tick the appropriate box to indicate your cultural background.

A White

- British
- English
- Welsh
- Irish
- Scottish
- Northern Irish
- Any other White background: _____

B Mixed

- White and Black Caribbean
- White and Black African
- White and Asian
- Any other Mixed background: _____

C Asian, Asian British

- Indian
- Pakistani
- Bangladeshi
- Any other Asian background: _____

D Black, Black British

- Caribbean
- African
- Any other Black background: _____

E Chinese, Chinese British

- Chinese
- Any other background: _____

Applicant Name:	Date Completed:
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This information will be treated in the strictest confidence and will be used to monitor the diversity HPC job applicants. The data you provide here will be transferred to our Human Resources database. Thank you for completing this form.

Appendix 3 – Voluntary Equal Opportunities [and Diversity](#) Monitoring Form

Please note that all proposed changes to the Voluntary Equal Opportunity Monitoring Form for partners and employees have been highlighted in red for the ease of the Committee. The changes have been based on the advice from Diane Hodgson (Director, Management Development, JSB Training and Development) and the forms used for this purpose by the National Audit Office and the Equality and Human Rights Commission.

It should be noted that to monitor the additional categories and types of disability suggested, this will involve additional cost as the human resources system (Professional Personnel) will need to be modified in order to record this data.

Voluntary Equal Opportunities and Diversity Monitoring Form (Employees and Partners)

Thank you for applying to a vacancy at the HPC. This is a voluntary monitoring form which we ask you to fill in and submit with the rest of your application.

The HPC is committed to equal opportunities, and reflecting the diversity of the public. To monitor our recruitment process we collect diversity data on all applications, which is stored separately from the rest of your application and is not seen by any shortlisting or interview panels. It is used to produce statistics so that we can analyse the diversity profile of those applying to the HPC and meet the obligations of our Equality and Diversity Scheme.

Gender Male Female Prefer not to say

Transgender Male Female Prefer not to say

Age Up to 18 years 46-55 years
 19-25 years 56-60 years
 26-35 years over 60
 36-45 years

Date of Birth _____

Marital Status Single Widowed
 Married Partner
 Divorced

Do you have dependant children? No Yes If yes, please indicate number: _____

Do you consider yourself to have a disability?

No Yes

If yes, please indicate the type(s) of impairment that apply to you:

Physical impairment Sensory impairment

Mental health condition Learning disability

Long standing illness or health condition

Other
(Please specify if you wish: _____)

Ethnic Group

What race or ethnicity do you consider yourself?

Choose ONE section from A to E, and then tick the appropriate box to indicate your cultural background.

A White

- British
- English Scottish
- Welsh Northern Irish
- Irish Any other White background: _____

B Mixed

- White and Black Caribbean White and Chinese
- White and Black African Any other Mixed background: _____

C Asian, Asian British, Asian English, Asian Scottish, or Asian Welsh

- Indian Bangladeshi
- Pakistani Any other Asian background: _____

D | **Black, Black British, Black English, Black Scottish, or Black Welsh**

- Caribbean
- African
- Any other Black background: _____

E | **Chinese, Chinese British, Chinese English, Chinese Scottish, or Chinese Welsh, or other ethnic group**

- Chinese
- Any other ethnic background: _____

Religion or Belief

Which group do you most identify with?

- | | |
|---|--|
| <input type="checkbox"/> <u>No religion</u> | <input type="checkbox"/> <u>Hindu</u> |
| <input type="checkbox"/> <u>Baha'i</u> | <input type="checkbox"/> <u>Jain</u> |
| <input type="checkbox"/> <u>Buddhist</u> | <input type="checkbox"/> <u>Jewish</u> |
| <input type="checkbox"/> <u>Muslim</u> | <input type="checkbox"/> <u>Sikh</u> |
| <input type="checkbox"/> <u>Christian</u> | <input type="checkbox"/> <u>Any other religion or belief</u> |
- (specify if you wish) _____

Your Sexual Orientation

- | | |
|--|---|
| <u>Bisexual</u> <input type="checkbox"/> | <u>Gay Woman/Lesbian</u> <input type="checkbox"/> |
| <u>Gay Man</u> <input type="checkbox"/> | <u>Heterosexual/Straight</u> <input type="checkbox"/> |
| <u>Other</u> <input type="checkbox"/> | <u>Specify if you wish:</u> _____ |

Applicant Name: _____ **Date Completed:** _____

Appendix 4 - Equality and Diversity Scheme

Introduction

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. 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; and
- our employees and the “partners” who carry out tasks on our behalf.

Legislation

3. In recent years, UK 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.

4. We are required to meet the general duties under relevant equality legislation, including:

- Race Relations Act 1976;
- Disability Discrimination Act 1995

5. The legislation also requires some public bodies to meet certain ‘specific duties’ such as publishing a scheme. We are not one of those bodies but decided that, as part of good practice, we would go beyond what the law requires and publish an equality and diversity scheme. This scheme describes the steps we have taken and will

take in order to ensure that we do not discriminate against people on the basis of:

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

6. The scheme builds on our statements of our policy for each of these groups (which are set out overleaf), but is a single scheme, rather than a series of schemes for each of those groups, as many of the steps we might take to avoid or mitigate any adverse impact are relevant to all of them.

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, where appropriate, 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.

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 as the “qualifying body” for those it regulates. The Act makes it unlawful, without justification, to treat 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;
- 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.

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. The Equality Act 2006 makes it unlawful, in the exercise of public functions, to discriminate on the grounds of gender or sexual orientation.

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.

Religion and Belief Equality Policy

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

The Equality Act 2006 makes it unlawful to discriminate, without justification, on grounds of religion or belief by treating a person less favourably or by 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.

Age Equality Policy

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

The Employment Equality (Age) Regulations 2006 make it unlawful to discriminate without justification on grounds of age in employment and vocational training. 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 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 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.

Developing a scheme

7. Our work in producing a scheme was led by a project team with participation drawn from our Executive Management Team and managers across the organisation. The work was led by a project lead and managed by a project manager.

8. Our first step in producing a scheme was a screening process carried out by the project team.

9. We asked the head of each directorate or department to detail their processes.

10. This was screened by the project team in partnership with the directorate / department head. The project team:

- identified which functions were more relevant than others to meeting the general duties and to eliminating discrimination generally;
- prioritised those functions;
- identified those areas of work already undertaken and in the workplans of directorates and departments in the coming financial year which support the aims of the equality and diversity scheme;
- identified initial action points; and
- identified where further consultation – both internal and external – might be desirable.

Arrangements for training of employees, council members and partners

11. Early on in the development of the scheme, the members of the project team, and our Executive Management Team received training in equality and diversity issues.

12. We have also held training in equality and diversity issues for council members and for some of the 'partners' who carry out work on our behalf.

13. We have started a rolling programme of training in equality and diversity issues for existing and new employees.

Collection of demographic data

14. An important ongoing action point identified in the scheme is the collection of demographic data.

15. In April 2007, we began collecting demographic data from witnesses and registrants involved in our fitness to practise process. This involved sending an equality monitoring form to complainants

and registrants at an early stage in the course of dealing with a complaint.

16. We already collect demographic information from applicants for employment and new employees and will continue to do so. We currently collect the following information:

- Gender
- Age
- Disability
- Race/ Ethnicity

We currently collect the following demographic information about registrants:

- Gender
- Age
- Nationality

17. In order to be sure that it is necessary to collect additional information, we plan to take a pragmatic approach, before deciding whether it is necessary to collect further data.

18. As detailed in the action points, we will first ask our Finance and Resources Committee to consider an analysis of the demographic data we hold for applicants and employees.

19. We will then ask our fitness to practise committees to consider an analysis of the data collected in the first year from registrants and complainants involved in our fitness to practise process.

20. Analysing this data will help us understand how our processes are working and potentially reveal further steps we could take to mitigate or eliminate any adverse impact.

21. Following this we will decide whether we need to consider extending our data collection to the general registrant population. This could include adding a monitoring form to all new application forms and, potentially, considering whether we should begin to collect data from existing registrants.

Consultation and involvement

22. We have used the following methods to contact and involve organisations and individuals in the development of the scheme.

Employee involvement

23. Heads of directorates and departments were involved in putting together the scheme, in addition to the members of the project team.

24. We also established an internal working group of ten employees. This comprised of nine volunteers drawn from across the organisation, and a member of the project team. The composition of the internal working group broadly represents the diversity of employees.

25. The internal working group will perform an important role in helping to fulfil the action points in the scheme.

26. For example, the internal working group have begun work by starting to impact assess human resources / partners policies.

27. Early drafts of the scheme were also considered by the middle management group (comprising of representatives drawn from each department) and the executive management team.

28. We will also consult with the wider employee population where appropriate. We routinely consult with employees when we make amendments to human resources policies.

External consultation and involvement

29. We intend to take a pragmatic and targeted approach to external consultation and involvement. We will identify where further consultation or involvement is necessary. In doing so we will consider whether consultation would be proportionate to the importance of the process and the extent of the possible or perceived adverse impact identified.

30. In the scheme, there are a number of action points which involve seeking external input on specific tasks. For example, we say that we will continue to involve outside individuals and organisations in reviewing our publications and in reviewing the accessibility of our offices.

31. At the end of the lifetime of the scheme, we will review the effectiveness of this approach. This might include considering whether a different approach to achieving external involvement is necessary.

Ongoing monitoring of action points and equality duties

32. Each individual department will be responsible for meeting the action points detailed in the scheme. Monitoring of the action plan will be undertaken by the project lead and project manager, with the project team.

33. As detailed in the action points, departmental work plans will now include an equality impact assessment to ensure that the equality implications of ongoing work are considered. These assessments will be considered by the project team on a periodic basis to ensure that all implications are considered and accounted for.

34. Our ongoing monitoring will consider not only whether any new or existing policies and processes have a negative impact on any group, but also whether there are opportunities for achieving a more positive impact.

35. Other ways of monitoring our progress are detailed in the action points, including regular scrutiny of information by our Council and Committees. For example, we say that our Finance and Resources Committee should consider demographic information collected from employees and applicants each year and further actions may arise from this consideration.

36. This scheme will run for three years. We will publish progress reports each year. These will be scrutinised by our Council prior to publication.

Further information

37. We would welcome any questions or feedback about our scheme.

38. If you have any questions or comments please contact us:

Equality and Diversity
Health Professions Council
Park House
184 Kennington Park Road
London
SE11 4BU

Email: policy@hpc-uk.org
Tel: 0207 840 97815

Department/ Directorate	Completion date
<p>Human Resources (HR) / Partners</p> <p>Functions:</p> <p>Our Human Resources department is responsible for:</p> <ul style="list-style-type: none"> • Recruitment • Training • Implementing or updating HR policies • Absence Management • Employee relations • Advising the Remuneration Committee <p>Recent, existing and ongoing practice</p> <ul style="list-style-type: none"> • We have taken steps to ensure that our selection process is fair and free from discrimination by ensuring that interview panels do not have access to personal information when short listing. • We have completed a review of our employee handbook to ensure that equality and diversity legislation is accounted for prior to publication of the scheme. <p>Action points</p> <ul style="list-style-type: none"> • We will implement a rolling programme of reviewing HR policies on a regular basis, in consultation with the equality and diversity internal working group, middle management team and employees. • We will review our practices around employment of disabled employees, particularly around adjustments following a recruitment decision, in consultation with employees. • As part of the information and consulting regulations, we will recruit HR representatives drawn from the diversity of the employee population. They will act as a link between HR and employees. 	<p>Ongoing.</p> <p>Part of the above</p> <p>July 2008</p>

Department/ Directorate	Completion date
<p>Action points (continued):</p> <ul style="list-style-type: none"> • We will conduct an employee attitude survey to find out what our employees like and dislike about HR practices in the organisation. • We will explore the feasibility of working towards obtaining the 'two ticks' symbol which denotes organisations that are positive about disability. • We will review the complaints and appeals processes for partners, including updating the guidance for appeals panel members to include guidance on equality and diversity issues relevant to their role. • We will analyse and monitor the data we collect for human resources purposes and produce a report each year for our finance and resources committee. 	<p>April 2008</p> <p>To end of 2010</p> <p>April 2008</p> <p>November 2007 and ongoing</p>

Department/ Directorate	Completion Date
<p>Facilities</p> <p>Functions:</p> <p>The Facilities department is responsible for:</p> <ul style="list-style-type: none"> • Buildings and facilities • Mail • Reception • Catering • Security <p>Existing, Recent and ongoing practice:</p> <ul style="list-style-type: none"> • We commissioned an accessibility audit in 2006. We have made the following changes in line with the audit: <ul style="list-style-type: none"> ○ we have improved the signage at our offices ○ we have changed the handrails to the entrance of our offices ○ we have added high visibility nosings and contoured floor coverings at the top and bottom of the steps leading to the entrance of our offices <p>Action points:</p> <ul style="list-style-type: none"> • We will explore making the following improvements to our facilities: <ul style="list-style-type: none"> ○ induction loops in the council chamber and reception area ○ audio description in the lifts • We will review our progress against the accessibility audit conducted in 2006 and present the findings, and our recommendations for future plans, to our Finance and Resources Committee. 	<p>Installation is planned by end of 2008</p> <p>Viability of proposal explored by end of 2009, with present aim for completion by end of 2011.</p> <p>By end of 2008</p>

Department/ Directorate	Completion Date
Action points (continued): <ul style="list-style-type: none"><li data-bbox="289 310 959 451">• We will ensure that employees working on reception receive training on our arrangements for assisting people with disabled people who are visiting our offices.	Ongoing

Department/ Directorate	Completion date
<p>Communications</p> <p>Functions:</p> <p>The functions of the Communications department are:</p> <ul style="list-style-type: none"> • Media and campaigns • Events • Public Affairs • Publications • Internal communications • The internet <p>Recent, existing and ongoing practice:</p> <ul style="list-style-type: none"> • We worked with the Fitness to Practise department to review two brochures – ‘How to make a complaint about a health professional’ and ‘What happens if a complaint is made about me?’ The publications benefited from the input of people with communication disabilities and we used this feedback to improve the accessibility of the style and content. • We recently produced a ‘house style’ guide which will guide employees in producing publications. This will ensure that the language and layout of publications is accessible and consistent. • We revised our visual identity and this was essentially aimed at making our publications more accessible. In carrying out this work, we benefited from the input of disability organisations. <p>Action points:</p> <ul style="list-style-type: none"> • We will continue to seek the input of groups representing disabled people and other groups when reviewing the style, text and accessibility of our publications. • We will seek the input of our stakeholders on equality and diversity issues in our opinion polling to be commissioned in Autumn 2007. 	<p>Ongoing</p> <p>November 2007</p>

Department/ Directorate	Completion date
<ul style="list-style-type: none"> We will add to all our publications so that it is clear that all our publications are available in alternative formats (e.g. Braille). 	Ongoing
<ul style="list-style-type: none"> We will review the layout and content of our website to ensure that it is as accessible as possible. This will include publishing key publications on our website in a range of different languages. 	March 2008
<ul style="list-style-type: none"> We will continue to participate in the Joint Regulators Public Patient Involvement (PPI) group which aims to develop consistent ways in which regulators can ensure the wider involvement of patients and the public in their work. 	Ongoing
<ul style="list-style-type: none"> We will publish our brochure 'How to make a complaint about a health professional' on our website in a number of different languages. 	End of 2008

Directorate/ Department	Action points
<p>Policy and Standards</p> <p>Functions:</p> <p>The Policy and Standards department is responsible for:</p> <ul style="list-style-type: none"> • assisting the Council in developing strategy and policy; • assisting the Council in setting and reviewing standards; • assisting the Council in drafting guidance; • supporting Professional Liaison Groups (PLGs); • managing consultations; • managing the new professions, or ‘aspirant groups’ process; • liaising with the Council for Healthcare Regulatory Excellence (CHRE) on their annual performance review; and • ensuring consistency of approach across all HPC departments. <p>Existing, recent and ongoing practice</p> <ul style="list-style-type: none"> • We sought the input of patient groups in our recent review of our standards of conduct, performance and ethics. • When we reviewed our standards of proficiency we considered the code of practice produced by the Disability Rights Commission for qualifications bodies. • We have recently published guidance for education providers and for applicants and potential applicants to approved courses about health, disability and registration. <p>Action points</p> <ul style="list-style-type: none"> • We will review our consultation process to ensure that the ways in which we consult are appropriate, accessible and reach a broad audience. The outcomes of our review will be considered by our Council. 	<p>April 2008</p>

Directorate/ Department	Action points
<p>Action points (continued):</p> <ul style="list-style-type: none"> • We will undertake a piece of work, seeking the input of disabled people and of education providers, to assess the impact and effectiveness of our guidance for disabled people, education providers and doctors – ‘A disabled person’s guide to becoming a health professional’ and ‘Information about the health reference’. • As part of our work in implementing the ‘Healthcare Professionals Crossing Borders Agreement’ we will examine using translation services to improve our accessibility for members of the public who do not speak English. • We will work with our Education department to produce a position statement / guidance in light of recent age discrimination legislation. This will describe how this affects education providers and our role in approving courses. • We will consider equality and diversity implications when we review our returners to practice requirements. • We will work with our communications department to produce a Welsh language Scheme. • On an ongoing basis, and, formally by the end of the currency of this scheme, we will review our approach on consultation and involvement of external organisations and individuals on issues with relevance to equality and diversity. 	<p>2009/10 financial year</p> <p>January 2008</p> <p>January 2008</p> <p>Review begun 2010/11 financial year</p> <p>2008/09 financial year</p> <p>Ongoing and by end of 2010</p>

Department/ Directorate	Completion date
<p>Fitness to Practise</p> <p>Functions:</p> <p>The main functions of the Fitness to Practise department are:</p> <ul style="list-style-type: none"> • Investigation of complaints about registrants • Adjudication of cases • Case management • Registration appeals • Setting hearings • Protection of title and health and character cases <p>Existing, recent and ongoing practice:</p> <ul style="list-style-type: none"> • We have changed the standard of acceptance for allegations so that we can, in some circumstances, take complaints by telephone. This will assist complainants who are less able to make a complaint in writing. • We have reviewed our complaints leaflets, in conjunction with the communications department. <p>Action points:</p> <ul style="list-style-type: none"> • We will review our practice notes (which provide guidance to panel members) in light of the changes to equality legislation. In particular, we will revise the practice note on equal treatment. • We will produce a new practice note on disability to ensure that panels are informed about the law and requirements about reasonable adjustments. • We will continue to train our fitness to practise partners in issues pertinent to ensuring a fair hearing, including equality and diversity issues and we will evaluate the effectiveness of this. • We will collect demographic data from registrants involved in fitness to practise proceedings and from complainants. We will analyse this data and present the findings to our three fitness to practise committees. 	<p>Ongoing</p> <p>March 2008</p> <p>Legal Assessors will be trained in equality and diversity issues in January 2008</p> <p>April 2008</p>

Department/ Directorate	Completion date
<p>Action points (continued):</p> <ul style="list-style-type: none"> • We will review the way in which we schedule hearings to ensure that we identify and accommodate any additional needs at an early stage. • We will establish a policy around the handling and purchasing of religious books . 	<p>February 2008 and ongoing</p> <p>January 2008</p>

Department/Directorate	Completion date
<p>Education: Approvals and Monitoring</p> <p>Functions:</p> <p>The main functions of the Education: Approvals and Monitoring department are:</p> <ul style="list-style-type: none"> • Visiting education providers to assess their programmes against the standards of education and training and training. • Managing the annual monitoring and major/minor changes processes. <p>Existing, recent and ongoing practice:</p> <ul style="list-style-type: none"> • Awareness of equality and diversity issues is imbedded throughout our standards of education and training. In particular, we have specific requirements for education providers and placement providers to have equal opportunities and anti-discrimination policies and to offer sufficient pastoral support to students. • We routinely take into account the needs of visitors, education providers and employees when we arrange approvals visits. <p>Action points</p> <ul style="list-style-type: none"> • We will work with the Communications department to formally review our publications against the house style as part of our rolling programme of reviewing our processes and publications. • We will work with the partner manager to train visitors on equality and diversity issues. • We will work with the policy and standards department to produce a position statement / guidance in light of recent age discrimination legislation. This will describe how this affects education providers and our role in approving courses. 	<p>Ongoing - Annual monitoring and approvals publications reviewed in 2008/09 financial year</p> <p>From December 2008</p> <p>January 2008</p>

Department/Directorate	Completion date
<p>Secretariat</p> <p>Functions</p> <ul style="list-style-type: none"> • Support the Council and committees, ensuring that these have the governance structures, the administrative support, and the resources needed to deliver the HPC strategy. • Organisational lead on matters relating to implementation of the Freedom of Information and the Data Protection Acts. <p>Existing, recent and ongoing practice</p> <ul style="list-style-type: none"> • Recruitment campaigns for new Council members aim to target a diverse range of candidates. • Council and committee papers provided in different formats if requested. • Consideration given to accessibility of external venues. • Feedback forms provided for Council members to assist the Secretariat in providing for their needs. <p>Action points</p> <ul style="list-style-type: none"> • Continuing consideration will be given to methods of ensuring that Council members are recruited from a diverse range of backgrounds. • The Secretariat will work with the Communications Department to further develop the format of Council papers to ensure that these are accessible to all groups. • All new Council members will receive equality and diversity training. 	<p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>

Department/Directorate	Completion date
<p>Information Technology</p> <p>Functions</p> <ul style="list-style-type: none"> • Back Office systems • Network and security systems • IT projects • Information services <p>Existing, recent and ongoing practice</p> <ul style="list-style-type: none"> • Adjustments researched and offered to employees with particular needs on an individual basis. <p>Action points</p> <p>There are no specific action points for the Information Technology department. However, the department is likely to play an important role in the delivery of action points in other areas (e.g. in collection, storage and analysis of demographic data).</p>	

Department/Directorate	Completion date
<p>Registrations</p> <p>Functions:</p> <p>The registrations department is responsible for:</p> <ul style="list-style-type: none"> • Processing applications for registration from UK, international and grandparenting applicants. • Answering queries from applicants. • Processing applications for readmission to the register and for renewal. • Changes of address and other registration administration. • Answering queries from registrants. <p>Existing, recent and ongoing practice:</p> <ul style="list-style-type: none"> • We revised our application forms and guidance notes to make sure that they were accurate, easy to follow and written in easy to understand English. <p>Action points:</p> <p>There are no specific action points for the registrations department. However, a number of the action points elsewhere, particularly in relation to alternative formats, are likely to benefit this area as well.</p>	

Department/Directorate	Completion date
<p>Finance</p> <p>The main functions of the finance department are:</p> <ul style="list-style-type: none"> • Management and financial accounting • Accounts payable • Banking • Suppliers <p>Action points</p> <ul style="list-style-type: none"> • We review our fees every two years. When we review our fees, we will consider the equality and diversity implications of our existing fees, and any proposed new fees, drawing on the existing data we hold. For example, we might consider whether our readmission fee has a disproportionate impact on certain groups rather than others. • We will explore the possibility of making equality and diversity requirements of suppliers during our tender process. This will include considering practices in other organisations. 	<p>Ongoing</p> <p>2008/09 financial year</p>

Department/Directorate	Completion date
<p>All</p> <ul style="list-style-type: none"> • We will analyse the demographic data we hold and consider whether we need to collect further data. In particular we will: <ul style="list-style-type: none"> - present an analysis of the demographic data collected as part of human resources practice to our finances and resources committee. - present an analysis of the demographic data collected as part of our fitness to practise process. - make further decisions about whether to collect further data, and, if so, what that data should be. • Each directorate/ department will include an equality impact assessment in their yearly workplans. The workplans set out the planned work for that department in the coming financial year. These will be periodically reviewed by the project team. • We will begin a rolling programme of training for all employees, partners and council members on equality and diversity issues. 	<p>November 2007</p> <p>April 2008</p> <p>Ongoing – from April 2008</p> <p>Ongoing</p> <p>Ongoing</p>