

## General Medical Council Equality and Diversity Scheme 2011 – 2014

### Appendix 5 – Equality and Diversity Action Plan

#### Equality Objective 1: Providing Accessible Information and Services

**Outcomes:** Enhanced confidence amongst our interest groups that GMC policies, processes and procedures are fair, transparent and non-discriminatory; increased understanding of the impact of our policies, processes and procedures on diverse interest groups; enhanced access for all interest groups to our information and services; awareness by doctors of the GMC's policies, processes and procedures, and of the diversity of UK patients and service users.

#### Outcome 1: A fitness to practise complaints process that is fair, objective, accessible and easy to understand and informs improvements in service delivery

Actions	Accountability	Timescale	Measures
a) Obtain feedback from doctors and complainants about their experience of the GMC fitness to practise procedures, including the complaints process	Fitness to Practise	2011	Feedback from complainants and doctors Data analysis and trends identified Action taken
b) Review the effectiveness of the information that we provide about vexatious complaints	Fitness to Practise	2012 / 2013	Feedback from key interest groups Action taken
c) Improve the information we collect about complainants and witnesses	Fitness to Practise	2011	Review external best practice Collation of information about complainants No evidence of disproportionate adverse impact on any protected group Ongoing monitoring of data Action taken

## Outcome 2: Publications and communications are accessible and reflect good practice

Actions	Accountability	Timescale	Measures
a) Ensure a higher standard of accessibility for the GMC website through continued testing and development	Strategy and Communications	2011	User testing by people with disabilities Website functionality meets a wide range of access needs Website is Double A compliant Adheres to BS 8878 Public complaints and feedback on accessibility
b) Review our current approach to producing publications in different languages and formats	Strategy and Communications	2011	Analyse number and type of requests made and fulfilled Action plan to address findings
c) Develop and promote a set of accessibility standards for GMC publications and resource materials (internal and external)	Strategy and Communications	2012 / 2013	Improved accessibility of publications Staff awareness of standards Staff and public feedback
d) Extend the GMC's use of social media (for example, podcasts, blogs, webcasts, webinars)	Strategy and Communications	2011 / 2014	Opportunities identified Action taken
e) Use of task based focus groups to inform GMC information and guidance	Strategy and Communications	2011 / 2014	Number of groups used Involvement of a diverse range of key interest groups Action taken with feedback used to inform GMC information
f) Identify opportunities to enable more effective targeting of key GMC messages and to build new media relationships	Strategy and Communications	Ongoing	Opportunities identified Interviewees and case studies Editorial coverage More effective targeting of diverse media
g) Continue to develop a library of images of diverse people for use internally and externally in our communication materials	Strategy and Communications	Ongoing	Images available for relevant protected characteristics Range of images used reflect the diversity of UK society User feedback and complaints

h) Develop an interactive portal on the GMC website to explain health procedures to doctors and complainants and to provide reassurance about the way the GMC deals with concerns about a doctor's health	Fitness to Practise	2011	Portal in place Number of 'hits' during first 6 months Feedback from key interest groups
i) Review the application of the Welsh Language Scheme	Strategy and Communications	2011	Scheme meets compliance requirements set out by the Welsh Language Board

### Outcome 3: Registration and certificate processes are accessible for doctors

Actions	Accountability	Timescale	Measures
a) Work in partnership with others to enhance our registration processes	Registration	2011	Stakeholder feedback Identification of new key interest groups
b) Review the processes for obtaining documents from overseas organisations and identify the associated issues or barriers for international medical graduates registering with the GMC	Registration	2011	Review findings Feedback from key interest groups Action taken
c) Conduct a review of the arrangements for doctors changing gender	Registration	2011	Feedback from key interest groups Action taken
d) Develop a portal for UK medical graduate applicants	Registration	2011 / 2013	Feedback from key interest groups Number of hits
e) 'Recent applicant satisfaction survey' interrogates issues faced by different groups of doctors in registering with the GMC	Registration	2011	Feedback from key interest groups Action taken Enhanced registration process

## Equality Objective 2: Helping doctors to provide high quality care

**Outcomes:** Enhanced awareness by doctors of the diversity of UK patients and service users; being able to show how we have positively influenced other influential bodies to achieve positive change and tackle inequalities; enhanced confidence amongst our interest groups that GMC policies, processes and procedures are fair, transparent and non-discriminatory; increased understanding of the impact of our policies, processes and procedures on diverse interest groups

### Outcome 1: Improve the quality of care that diverse groups of patients receive

Action	Accountability	Timescale	Measures
a) Develop learning materials to help doctors provide better care for patients with learning disabilities	Standards and Ethics	2011	Develop effective partnerships taking on board best practice Service user involvement Learning materials address cultural attitudes towards learning disabilities and consent issues Opportunities to see website among target audiences Doctor feedback
b) Explore how the GMC can use opportunities within its guidance to include the health needs of diverse groups and the importance of making reasonable adjustments for people with disabilities	Standards and Ethics	2012 / 2013	Opportunities identified Feedback from key interest groups Action taken
c) Explore how the GMC could reference within its guidance forms of discrimination experienced by patients, for example homophobia and transphobia	Strategy and Communications	2011	Advice and feedback from key interest groups Action plan in place

## Outcome 2: Ensure doctors understand the standards and ethics of UK practice

Action	Accountability	Timescale	Measures
<p>a) Take positive steps to support International Medical Graduates (IMGs) to adjust to ethical decision making in the UK:</p> <ul style="list-style-type: none"> <li>• Effective signposting to resources / GMC guidance at registration to improve access for IMG to ethical decision making guidance</li> <li>• Take opportunities to raise awareness of relevant issues (such as the lack of induction for IMGs) with employers, professional bodies and others</li> </ul>	<p>Fitness to Practise Registration Standards and Ethics Strategy and Communications</p>	<p>2011 / 2013</p>	<p>Registration resources effectively signposts to GMC guidance Opportunities created to engage with key interest groups Website hits and click through rates Engagement with IMGs, employers, professional bodies, patients and the public IMGs report easy access to guidance and feeling supported.</p>
<p>b) Take steps to enhance awareness of doctors new to the UK of their ethical obligations as set in GMC guidance and to understand how to apply it in practice</p>	<p>Standards and Ethics</p>	<p>2011</p>	<p>Clearer signposting to GMC guidance Use of website by doctors, students, patients and the public Feedback from key interest groups</p>
<p>c) Consider the scope for inclusion of some form of ethical assessment as part of the Professional Linguistic and Assessments (PLAB) exam</p>	<p>Registration</p>	<p>2011 / 2012</p>	<p>Review and findings Implementation of any recommendations PLAB exam reflects principles of Good Medical Practice (GMP) Awareness of GMP guidance with PLAB candidates.</p>

**Outcome 3: Medical students and doctors develop equality, diversity and human rights awareness, knowledge and good medical practice**

Action	Accountability	Timescale	Measures
a) To continue to consider equality and diversity in all stages and aspects of the development of GMC guidance and the review process including consultation and accessibility of guidance	Standards and Ethics	Ongoing	Consultation and engagement results Outcome of EqIAs Target audiences identified and appropriate accessible arrangements are in place Development plans include equality and diversity Distribution of standards and ethics guidance
b) Ensure that our quality improvements framework (QIF) is fair, based on robust evidence and transparent and that providers are meeting the specified standards on equality and diversity	Education	2011	Meaningful measures to evaluate performance against the equality and diversity domain of Tomorrow's Doctors. Pilots taken account of equality and diversity issues. Equality and diversity training module for staff and visit teams Sustained change on a year to year basis Actions taken to address findings
c) Review each domain of Tomorrows Doctors (in addition to domain 3) and the Trainee Doctor to identify where further guidance on equality and diversity may be required	Education	2011	Review completed with diverse key interest groups Stakeholder feedback Produce further guidance where required
d) Establish where and how equality and diversity can be used as a theme in Quality Assurance outside of visits	Education and Strategy and Communications	2011	Equality and diversity is explored in quality assurance outside of visits Evidence of monitoring equality and diversity through quality assurance mechanisms

### Equality Objective 3: Being a fair regulator

**Outcomes:** Enhanced confidence amongst interest groups that GMC policies, processes and procedures are fair, transparent and non-discriminatory; increased understanding of the impact of our policies, processes and procedures on diverse interest groups; enhanced awareness by doctors of the GMC's policies, processes and procedures and of the diversity of UK patients and service users; enhanced reputation as a regulator; being able to show how we have positively influenced other bodies to achieve positive change and tackle inequalities

#### Outcome 1: Our policies, processes, procedures are fair transparent and non-discriminatory

Action	Accountability	Timescale	Measures
a) To undertake a further programme of work to improve the experience for complainants and witnesses in our fitness to practise procedures	Fitness to Practise	2011	Feedback from staff on guidance for dealing with vulnerable witnesses Enhanced guidance for young witnesses Feedback from complainants and witnesses Mapping of witness journey through procedures Actions taken to improve experiences for witnesses Evaluation scheme for witness support programme
b) Monitor the diverse representation of Fitness to Practise panel members and take steps to achieve a diverse pool of applicants when recruiting for FtP panels	Fitness to Practise	2011	Diverse monitoring of panel members Diverse targeting in recruitment Diverse pool of applicants
c) Consider whether Fitness to Practise deliberations correctly identify and take action in relation to doctors who put patients with disabilities at risk, through failure to appropriately take account of their needs	Fitness to Practise	2011 / 2013	Review undertaken Actions taken
d) To build relationships with different communities of doctors and complainants to improve mutual understanding of the equality and diversity issues that arise within our fitness to practise work	Fitness to Practise	2011 / 2014	Consultation and engagement with key interest groups Build evidence base Feedback informs policy development

**Outcome 2: We understand the impact of policies and processes on diverse groups of doctors, patients and service users**

Action	Accountability	Timescale	Measures
a) Analyse profiles and demographics of doctors in Fitness to Practise procedures to identify key trends and communicate key messages	Fitness to Practise	2011 / 2013	Profile analysis and trends in key areas identified Understanding improved in identified key areas Action taken on findings
b) Repeat the King's College independent research into Fitness to Practise decisions at the GMC to provide assurance that decisions are consistent and in line with our published guidance	Fitness to Practise	2012	Research conducted Analysis of trends Action taken on findings
c) Proactively identify opportunities to explore the issues affecting all groups across the protected characteristics, for example, disabled, lesbian, gay and bisexual and trans patients and doctors	Fitness to Practise	2011 / 2013	Meetings and roundtable discussions with relevant groups Issues identified Action taken
d) Ensure that case examiners and panellists are aware of and have received appropriate training in relation to the relevant issues and etiquette that may apply to diverse groups of witnesses and doctors	Fitness to Practise	2012	Review of training Inclusion of the challenges faced by diverse groups such as people with disabilities or those from different ethnic groups Identify issues Action plan to address findings Feedback from panellists on their understanding of equality and diversity issues
e) Proactively identify opportunities to explore issues affecting women doctors for example by setting up a user group for women doctors and convening roundtable discussions	Fitness to Practise	2011 / 2013	Roundtable meetings Notes of meetings Analysis of feedback Action taken to inform work

**Outcome 3: Our revalidation policies, processes and standards are fair, transparent, robust and proportionate**

Action	Accountability	Timescale	Measures
a) Engage with diverse groups of doctors to understand the potential impact of revalidation, analyse feedback, identify trends and use these to inform work and policy development	Continued Practice and Revalidation	2011 / 2012	Range of doctors Analysis of feedback Action taken to inform policy development
b) Analyse the responses from the collecting data about licensed doctors project, to identify if there are any trends for specific groups of doctors	Continued Practice and Revalidation	2013	Data analysis by equality characteristic Trends and actions identified Progress on action plan
c) Develop and implement proposals to ensure that the supporting information required for revalidation is fair, robust and attainable by all doctors (workstream 1)	Continued Practice and Revalidation	2012	Appraisal guidance reflects equality and diversity considerations Review findings of Department of Health testing of pilots Action taken
d) Work to ensure that the policies and processes relating to revalidation are fair, robust and proportionate (workstream 2)	Continued Practice and Revalidation	2011 / 2012	Delivery Boards implementation plans include equality and diversity considerations Engagement with key partner organisations Department of Health Impact Assessment addresses equality and diversity issues
e) Ensure that equality and diversity are given due consideration in the consultation on regulations and guidance (workstream 3)	Continued Practice and Revalidation	2011	Range of consultees by equality characteristic Consultation and involvement reflects equality and diversity considerations Feedback and views inform planning and policy development
f) Develop and implement a fair and robust quality assurance framework (workstream 4)	Continued Practice and Revalidation	2011 / 2014	Quality assurance framework in place Range of equality and diversity indicators Toolkit reflects equality and diversity principles

			<p>Take-up rates for toolkit</p> <p>User views on its usefulness</p> <p>Review of progress against indicators</p>
<p>g) Processes for managing Responsible Officer recommendations are fair, transparent and proportionate (workstream 5)</p>	<p>Continued Practice and Revalidation</p>	<p>2011 / 2012</p>	<p>Equality and diversity issues identified</p> <p>Guidance for Responsible Officers reflects equality and diversity considerations</p> <p>Feedback from key interest groups informs guidance</p> <p>Views of users on usefulness of guidance</p>

## Equality Objective 4: Using our influence to create positive change

**Outcomes:** Enhanced confidence amongst our diverse interest groups that our policies, processes and procedures are fair and robust; enhanced awareness by doctors of the GMC's policies, processes and procedures and the diversity of UK patients and service users; enhanced reputation as a fair regulator; being able to show how we have positively influenced other influential bodies to achieve positive change and tackle inequalities

### Outcome 1: Our work on equality and diversity makes a difference and improves outcomes for diverse and marginalised groups of people

Action	Accountability	Timescale	Measures
<p>a) Engagement with key partners to support the development of fair, inclusive, transparent and robust policies and processes in the areas that they have responsibility for:</p> <ul style="list-style-type: none"> <li>• Employers</li> <li>• The NHS and other providers of healthcare</li> <li>• Medical schools and royal colleges, educational and training providers, deaneries</li> <li>• The government and devolved administrations (e.g. Department of Health)</li> </ul>	All directorates	2011 / 2014	<p>Number of engagement activities</p> <p>Feedback informs policy development and planning</p> <p>Evidence of GMC's influence on key partner's policies and processes</p>
<p>b) Participate in Diversity Partners meetings between the General Medical Council, British Medical Association, Care Quality Commission, NHS Employers and Department of Health (England) to identify and share best practice</p>	Strategy and Communications	Quarterly (June, September and December 2011)	<p>Evidence of positive influence on other influential bodies for diverse and marginalised communities</p> <p>Minutes of meetings</p> <p>Best practice is used to inform policy development</p>
<p>c) Participate in joint healthcare equality and diversity regulators forum</p>	Strategy and Communications	January, May and September 2011	<p>Minutes of meetings</p> <p>Action plans to address issues arising</p> <p>Best practice is used to inform policy development</p>

d) Identify the potential equality and diversity considerations and impacts of diverse groups of key interest groups in our horizon scanning for developments	Strategy and Communications	Ongoing	Intelligence used to inform policy development and planning
e) GMC standards, guidance and plans are informed by the perspectives of diverse interest groups	All Directorates	2011 / 2012 (and ongoing)	A diverse range of key interest groups across the four countries are targeted and involved in Child Protection and the review of Good Medical Practice Involvement of task based independent equality and diversity advisors where appropriate Notes of meetings Feedback informs GMC guidance and plans Action plans to address issues Engagement and involvement summary reports

**Outcome 2: We work with our partners and other influential organisations to help change things for the better**

Action	Accountability	Timescale	Measures
a) Together with partners and key interest groups, raise awareness of barriers to healthcare and systems failings which impact upon high quality patient care for all	All Directorates	Ongoing	Evidence of where the GMC identifies and engages with other influential bodies Learning incorporated in GMC's guidance, standards, policies and processes
b) Use opportunities to raise awareness with employers, professional bodies and others of the importance of including equality and diversity dimensions within communication training	Strategy and Communications (in conjunction with all Directorates)	2011 / 2012	Opportunities identified to raise awareness Doctors have an improved understanding of the etiquette to use when communicating with diverse groups of patients and staff
c) Undertake work to understand the barriers for particular groups of doctors in	Education and Strategy and	2011	Barriers to selection, transition and progression for protected characteristics identified

<p>progressing through each stage of their career</p>	<p>Communications</p>		<p>Feedback from key interest groups          Analysis of data          Build evidence base          Actions identified to address proportionality</p>
<p>d) Work in partnership with others to ensure that all students and doctors have an equal chance to pursue and progress within their chosen career</p>	<p>Education</p>	<p>Ongoing</p>	<p>Key interest groups and opportunities for engagement identified          Targeted consultation around guidance on Continuing Professional Development          Barriers identified and action taken          Develop and promote case studies and best practice examples</p>

## Equality Objective 5: Being an employer of choice

**Outcomes:** Enhanced confidence amongst our interest groups and staff that GMC employment policies, processes and procedures are fair, transparent and non-discriminatory; increased understanding of the impact of our policies, processes and procedures on diverse interest groups; employment policies that are fair and equitable to all staff; the GMC attracts and retains a diverse workforce

### Outcome 1: To have an inclusive and diverse workforce at all levels

Action	Accountability	Timescale	Measures
a) A workforce profile that reflects the employment markets and society we operate in	Human Resources	Review annually	Baseline employee profile Monitoring of recruitment and advertising channels Clear action plans to target under-representation
b) Monitor and report on workforce trends	Human Resources	Annually	Report and analysis of diversity trends Report published Action taken based on trends
c) Review the options for using work experience or outreach work targeted at groups under-represented in the workforce	Human Resources	2011	Identification of options Steps taken to implement options Use of channels such as social media Under-representation targeted Success rates for work experience and outreach

## Outcome 2: Our training and development programme enhances skills and offers opportunities to all

Action	Accountability	Timescale	Measures
a) Complete and deploy a detailed review of training opportunities, access and links to promotion and pay	Human Resources	2011	Review completed and actions taken
b) Continue to deliver equality and diversity training and raise awareness of key issues for all staff and associates	Human Resources	Ongoing	All staff complete disability awareness training and diversity awareness training All associates complete bespoke diversity awareness training Based on role A diverse range of trainers Regularly review and act on delegate feedback Build confidence, tackle prejudice and ensure fairness, transparency and non-discrimination
c) Review equality and diversity training delivered to staff and associates	Strategy and Communications / Human Resources	2011 / 2012	An approach to evaluate impact of equality and diversity training Action taken based on findings to enhance training

## Outcome 3: Employment policies and practices are fair, transparent and non-discriminatory

Action	Accountability	Timescale	Measures
a) Promote awareness of the GMC's policy on flexible working	Human Resources	2011	Identify ways of tracking informal requests Monitor take-up rates across the organisation and by equality characteristic Steps taken to improve take-up
b) Develop and implement clear policies on transgender issues and improve the understanding of the Gender Recognition Act	Human Resources	2011	Policy in place with input from trans community and staff Levels of understanding assessed Levels of understanding improved

c) Benchmark the GMC's approach to equality and diversity across the protected characteristics with other leading UK organisations	Strategy and Communications	2011 / 2012	Membership of benchmark organisation Organisation's rating measured against benchmark Improvements year on year
d) Remove the default retirement age	Human Resources	2011	Action plan in place Consultation and engagement with staff undertaken to develop policy Retirement age removed
e) Proactively provide reasonable adjustments for disabled applicants and employees/associates and develop consolidated guidance for managers on accessibility options and services	Human Resources / Facilities / Information Systems / Strategy and Communications	2011	Numbers of reasonable adjustments requested, approved and refused Policy communicated to staff System for monitoring requests and evaluating actions Proactive actions taken Review emerging best practice and take action where appropriate to enhance the reasonable adjustments process Accessibility Working Group to develop guidance Reasonable adjustments policy is aligned to the Equality Act 2010
f) Monitor trends on pay, promotions and training	Human Resources	2011 and ongoing	Pay review statistics to identify gender pay issues and any trends for other diversity groups where appropriate Promotion data analysed Action plan in place Targets set and implemented

g) Ensure that any over-representation in employment disputes or issues are thoroughly investigated and researched	Human Resources	Annually	Numbers and nature of employment disputes by equality characteristic Any over-representation identified Action plan implemented to address findings
h) Review the diversity, harassment and disciplinary policies to ensure that they are in line with the 2010 Equality Act	Human Resources and Strategy and Communications	2011	GMC staff, suppliers and the public understand that the GMC has a zero tolerance policy on harassment

**Outcome 4: We value and draw on the experiences and perspectives of our diverse workforce to ensure that equality and diversity is embedded in everything we do**

Action	Accountability	Timescale	Measures
a) Ensure we review feedback from employees on diversity issues	Human Resources	Focus groups in 2011	Range of mechanisms in place Additional mechanisms where appropriate Feedback from staff through focus groups Staff views on effectiveness Diverse groups of employees
b) Investigate the possibility of setting up networks for diverse groups of staff	Human Resources / Strategy and Communications	2011 / 2012	Staff feedback Action taken

## Equality Objective 6: Improving our evidence base

**Outcomes:** Enhanced confidence amongst our interest groups that GMC policies, processes and procedures are fair, transparent and non-discriminatory and that evidence is used to inform policy development; increased understanding of the impact of our policies, processes and procedures on diverse interest groups

### Outcome 1: We ensure that our activities are informed by data that reflects the diverse society in which we operate

Actions	Accountability	Timescale	Measures
a) Develop a process to collect and monitor diversity data from key interest groups across the protected characteristics	All Directorates	2011 / 2013	<p>System for collecting, storing and analysing data</p> <p>Identification of data set required</p> <p>Data set assists tracking and evaluating progress and in informing understanding of a policy's impact on particular groups</p> <p>Data gaps are identified and action taken to fill them</p> <p>Staff and the public understand why and how the GMC undertakes diversity monitoring</p> <p>Published monitoring data on workforce and functions demonstrating transparency and public accountability</p>
b) Review our approach to identifying impact of our policies on diverse groups	Strategy and Communications	2011 / 2012	<p>Review of EqIA process and toolkit / guidance</p> <p>Process in place for equality analysis of policies.</p> <p>Evidence of how equality analysis has informed decision making and policy development</p> <p>Develop an evidence base for equality and diversity</p> <p>1:1 support</p>

## Equality Objective 7: Our internal governance supports our work to advance equality, diversity and human rights

**Outcomes:** Enhanced confidence amongst our interest groups that GMC policies, processes and procedures are fair, transparent and non-discriminatory; increased understanding of the impact of our policies, processes and procedures on diverse interest groups; processes in place to ensure that equality and diversity is embedded in our work

### Outcome 1: Visible and demonstrable leadership ensures that equality and diversity is embedded into our culture and work

Actions	Accountability	Timescale	Measures
a) Maintain a network of leaders who drive the GMC's work	Strategy and Communications	Ongoing	Champions are in place and there are mechanisms to support them Staff awareness of champions role Learning outcomes
b) The principles of equality and diversity are embedded in the delivery of the Corporate Strategy and business plan	Strategy and Communications	Annually	Robust set of KPI's and measures to track progress Equality and diversity features on management agendas Equality and diversity features in corporate strategy, business plan and operational plan Equality and diversity incorporated within the mid-year and end year review of the Corporate Strategy Equality and diversity dimension of issues included within the Chief Executive's report
c) Develop and publish equality objectives	All Directorates	2011 and reviewed annually	Published Equality Objectives Targets set Monitoring to track progress
d) Ensure that the GMC takes account of the duty to provide reasonable adjustments as an employer and service provider	All Directorates	Ongoing	Policy adheres to the legal framework Policy is communicated Requests are monitored and handled appropriately Staff feedback received and acted on Number of complaints

e) Embed equality and diversity in the GMC's competency framework	Human Resources	2012	Equality and diversity competences identified Training provided to appraisers and appraises Competences assessed annually Staff awareness raised
f) Continue to manage the business of the Equality and Diversity Committee (EDC)	Strategy and Communications	Ongoing	EDRG minutes Reports to Council Evidence of progress in embedding equality and diversity in core GMC plans and processes