

Agenda item:	3
Report title:	3-5 year plan for becoming a more inclusive organisation
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Action:	For decision

Executive Summary

Following the Employers Network for Equality and Inclusion (ENEI) gap analysis on inclusion, and presentation to SMT in September 2019, we have developed a plan to improve our inclusivity over the next 5 years. The implementation of the inclusion plan will be overseen by the IIP Board and the deliverables within the plan have been mapped against the opportunities to embed ED&I outcomes into the IIP workstreams.

In addition to approving the key headlines for our plan, there are two key areas that we are seeking agreement from the Board on – strengthening the approach that we take to setting measures and KPIs to drive meaningful progress on this agenda, and mobilising leaders to support our work to achieve an inclusive workplace. The progress against the plan and the assessment of performance against measures will inform the continued evolution of the plan across the 5 years.

Recommendations

The Executive Board is asked to:

- a** Approve the headlines of our inclusion plan for the next 5 years and note that no additional resources are currently required for 2020.
- b** Agree to strengthen our approach to setting inclusion KPIs and measures.
- c** Agree that leaders should have a personal action plan to visibly champion the inclusion agenda.

Background

- 1** Being an inclusive organisation is one of the strategic aims in our ED&I Strategy. Whilst being compliant with equality legislation is a lever for our ED&I activities, being an inclusive organisation goes beyond complying with the law. It reflects our ambition to be a fair and proportionate regulator and creating a workplace where everyone can thrive and feel welcomed and accepted. Aside from the moral case for inclusion, there is also a wider case for inclusion that benefits organisations, such as enhanced corporate reputation, employee retention and better financial / organisational performance. Research has found that inclusive teams make better business decisions up to 87% of the time and teams that work in an inclusive way make decisions twice as fast with half of the meetings. Overall, decisions made and executed by diverse teams, delivered 60% better results*.
- 2** We commissioned the Employers Network for Equality and Inclusion (ENEI), a leading expert on inclusion, to undertake a gap analysis of how inclusive we are as an employer. They used an evaluation and benchmarking tool called Talent Inclusion and Diversity Evaluation (TIDE) as a structure for conducting their analysis across a number of areas such as leadership and accountability, recruitment and attraction, and training and development. We engaged at all levels across the organisation, through bespoke workshops and other supporting communication activities, and used staff feedback to inform the findings of this work.
- 3** The ENEI analysis concluded in August 2019 and we presented the findings to SMT setting out the business case for inclusion and agreed the level of ambition was to aim for maturity on the benchmark over a 3-5 year timeline. Between September and December, we conducted an engagement exercise with colleagues at all levels to involve them in reviewing and prioritising the recommendations. We have worked with HR leads (and other relevant leads across the organisation, for example, communications colleagues) to shape the outputs of this exercise into a 5 year plan.
- 4** Alongside the inclusion gap analysis, during 2019, we underwent assessment for IIP accreditation, primarily receiving an assessment rating of 'established' and having aspiration to progress to 'high performing'. To support us progressing to a maturity level of high performing, a programme of work has been designed that presents a series of significant opportunities to further embed ED&I into our DNA as an employer.

* White Paper: Hacking Diversity with Inclusive Decision Making, 2018 (Cloverpop)
https://cdn2.hubspot.net/hubfs/2095545/Whitepapers/Cloverpop_Hacking_Diversity_Inclusive_Decision_Making_White_Paper.pdf

- 5** There have been recurrent themes in staff survey results that highlight that some groups of staff are less engaged than others, for example, colleagues from BME backgrounds, disabled staff, and those with caring responsibilities. We have not yet made significant progress on addressing these gaps. In addition to this, we know that there are some key issues for us, for example, the under-representation of BME staff in senior roles and the profile of BME staff in London, and equal pay.
- 6** The three main reviews in the SaPUP programme contained a small number of recommendations that relate to ED&I. These recommendations in some cases explicitly refer to the GMC to deliver key ED&I outcomes, whilst other recommendations are for wider stakeholders. As part of this we must ensure we are operating to the same high standards we expect of our stakeholders. The key recommendations that are relevant in this context are:
 - a** *GNM - have published measures and aspirations for diverse workforce representation in key roles and at all levels involved in decision making.*
 - b** *GNM – have in place methods of assurance of fair decision making such as ED&I training and unconscious bias training.*
 - c** *Fair to Refer - undertake ongoing monitoring of data to evaluate and measure delivery.*
 - d** *Fair to Refer – senior leaders to engage regularly with staff, taking action on concerns regarding fairness. Implement a strategy of active inclusion.*
 - e** *Fair to Refer and GNM both include recommendations around induction and better supporting those new to the workplace.*

Inclusion action plan headlines

- 7** We define our vision for inclusion as developing a culture where everyone feels valued and included. At an individual level we want colleagues to feel they belong, have a voice and are valued for their unique and authentic individual skills and abilities. As an organisation, we aim to create a culture which embraces, values and includes difference - whether that be a difference of opinion, working style, or a difference resulting from a person's background or protected characteristic. If we succeed in creating an inclusive culture, which everyone feels they belong to, and in which all voices will be heard, the result will be a more fulfilling workplace, ensuring better performance and increased innovation.

8 Annex A sets out the broad headlines of our plan and some of the key activities to support delivery against these headlines. Stages 3 and 4 are light on detail at the moment as they will be informed by activities in the earlier stages. We will update the Executive Board annually on progress, and to set out in more detail the activities that will form the latter stages of this plan.

a Stage 1 (2020): Building our evidence base and the foundations to drive change. This will include a compliance and governance review, and a learning needs analysis. These reviews will help identify interventions and changes in the years ahead that will address findings in the ENEI report to improve how we govern and oversee our ED&I work, steps we need to take to comply with the Equality Act 2010 (particularly around conducting Equality Analyses), and how we equip and upskill staff at all levels with ED&I knowledge, behaviours and skills to be a fully inclusive organisation. We are also undertaking a number of recruitment related activities, as part of our recruitment strategy, which will deliver against some of the ENEI recommendations in this area.

We will also be embedding ED&I outcomes in the IIP programme across each of the workstreams being delivered across the four domains of leading, supporting, improving and wellbeing. For example, our developing internship programme will be orientated towards underrepresented groups and will focus initially on BME representation, and subject to evaluation findings, consideration will be given to extending this to other groups who share protected characteristics. Similarly, the 'Aspiring Leaders Programme' will incorporate positive action measures, to ensure that the groups we see underrepresented at a senior level in the organisation receive fair access to the programme.

We will also develop tools to mobilise leaders in the organisation to champion the agenda and develop a long-term approach for how we benchmark our activities. Further detail on these specific elements for 2020 are set out later in this paper.

b Stage 2 (2021 – 2022): Piloting & learning. During this stage, we will implement the findings of the compliance and governance review, and training needs analysis. In addition to this, we plan to pilot one or two recruitment activities to understand what interventions and approaches deliver the best outcomes for our organisation. We will also seek, (with support from DRIH), to develop a data model, that enables us to interrogate diversity demographics and perceptions insights. 2021 will also see the launch of our new ED&I strategic objectives, and these will include KPIs and measures, which we will need to deliver against in the years ahead.

c Stage 3 (2023 – 2024): Mobilise & mature. By this point we hope to have developed more sophisticated data analysis that enables us to begin identifying the issues for particular diverse groups in our processes and to highlight the

interventions, tools and learning that might be needed to support these groups. We also hope to be able to use the model to look at intersectionality and the experiences and issues for those across multiple diversity strands.

d Stage 4 (2025): Evaluation. This includes re-evaluating our maturity against the TIDE framework to give us a sense of the progress we have made.

- 9** At this stage, the planned deliverables for 2020 have been assessed and, aside from the NIF bid that we have submitted for our intern programme, no further resource investment is required immediately, but this will remain under review throughout 2020, and the full duration of the plan. Longer term resource needs beyond 2020 will be considered within the 3 year business planning process linked to the new corporate strategy.

Recommendation: Approve the headlines of our inclusion plan for the next 5 years and note that no additional resources are currently required for 2020.

2020 Focus – Foundational Activities

Strengthening how we set KPIs and measures

- 10** Hays* explains that “data capture and analysis at different stages of the employee lifecycle underpins and informs the establishment, measurement and improvement of diversity and inclusion policies and practices”. The ENEI have made a number of recommendations about how we can strengthen the analysis and scrutiny of our workforce data. They say that inclusion interventions must have a strong evidence base, and data scrutiny should identify intersectional issues. However, we should also ensure that we are spotting opportunities in our existing and new activities to explore and embed inclusion.
- 11** It is clear from the ENEI, Hays and other experts, that good data management underpins the success of inclusion and, therefore, this should form a key priority in the first stages of our inclusion plan. Hays recommends that diversity demographics are analysed together with inclusion insights, for example, perceptions of fairness from the Staff Survey. There is an opportunity to strengthen our approach to setting KPIs and measures, and we recommend seeking support from DRIH to develop an HR data model, that builds our capacity to analyse and interrogate our HR information. This will help support the implementation of our new ED&I strategic

* Hays Diversity and Inclusion Report 2018 – Your keys to unlock the full potential of your talent

objectives from 2021, which will include KPIs and measures for our employment activities.

Recommendation: Agree to strengthen our approach to setting inclusion KPIs and measures.

Mobilising our leadership

- 12** Another priority area suggested by Hays is leadership Inclusive leaders are those who understand the relationship between diverse talent and organisational performance. Organisations 'grow' inclusive leaders and take time to cultivate and nurture their skills and knowledge. Hays explain that senior leaders need to champion inclusion, because they set the tone at the top and provide a reference point for what behaviour is expected in an organisation, and how diverse teams are leveraged to improve organisational performance. Mobilising leaders and managers (SMT, ADs and HoS) to take accountability and ownership of the inclusion agenda was another key theme of the ENEI report. Leadership / management competency and behaviours is also a key theme of IIP. Leaders play an important role in 3 key areas:
- a** Culture setting – being a role model and active advocate to ensure inclusion is embedded in behaviours, culture and practices.
 - b** Visibility and recognition – raising the profile internally and externally and encouraging all levels of the organisation to contribute to inclusion.
 - c** Decision making – both in terms of ensuring ED&I is embedded as an integral part of decision making but also ensuring that they influence peers and others' decisions.
- 13** Leaders would start by choosing an area of diversity / inclusion to champion. There are a range of options that they could choose from, (all of which would be supported by the ED&I team). These options are set out below.

Starting Out

- Learn more about the topic to build knowledge and understanding of the issues e.g. by reading articles, reports or attending learning events.
- Meet with colleagues, for example, diversity staff network relevant to the area to learn more about lived experiences of colleagues. If there isn't one, a focus group for staff to share their experiences, is another option.

- Raise awareness of this area with peers, for example, championing the issues in management team meetings / directorate meetings. Share the learning achieved.
- Champion the embedding of the issue in directorate work and activities (both employment and regulatory activities, where appropriate).

Next Steps

- Discuss / promote this area internally, for example, through directorate / organisation wide communications.
- Visibly speak about this area at directorate meetings, at away days etc. Encourage action and leadership on this area from colleagues at all levels.
- Speak externally, for example, through social media, at conferences and other events etc, to demonstrate commitment to both staff and external customers.
- Become a senior visible champion for one of our diversity staff networks and/or visibly participate in network events (if appropriate).
- Run an action learning set with peers to discuss and work collaboratively on the area (so there is joint ownership and it does not just sit with one person).
- Build a network with other senior champions externally in our sector to learn what other leaders do, share best practice, and collaborate to achieve change where appropriate.

14 For the agenda to be successful, the approach taken by each leader needs to be authentic and not a tick-box exercise of mandatory activities that do not inform their own personal development and championing of inclusion with staff. The proposed approach would be to develop a suitable menu of options reflecting the above themes and guidance on how leaders can be supported to deliver one or more of the activities they identify to take forward as part of their own personal action plan.

15 Council play an important role in leading on our ED&I agenda and members will need to develop their own action plans to demonstrate commitment and leadership to support our work in this area. We will discuss options for how they can demonstrate visible leadership on our inclusion work as part of the seminar presentation in July.

Recommendation: Agree that leaders should have a personal action plan to visibly champion the inclusion agenda.

3 – 3-5 year plan for becoming a more inclusive organisation

3 – Annex A

Inclusion Plan Headlines

	Stage 1 (2020): Building our evidence base and foundations
	<ul style="list-style-type: none"> ■ Learning needs analysis by cohorts, general roles and responsibility to identify knowledge, skills and behaviours we need on ED&I (S&P Business Plan activity). ■ Compliance and governance review, to identify what governance framework we need to ensure accountability and ownership of ED&I, and compliance with key equality requirements in our activities (S&P Business Plan activity). ■ Leadership roles – develop checklist / options / invitation of how leaders in the organisation can mobilise on the agenda. ■ Agree our baseline reporting formats (regular through the year and annual). ■ Define targets and measures as part of the development of our new ED&I strategic objectives and agree an approach for benchmarking our ED&I activities. ■ Expanding our apprenticeship programme, delivering our mentoring programme, designing and delivering our Aspiring Leaders programme and coaching e.g. for maternity, paternity and adoption returners, and mentoring. ■ Delivering People Manager Essentials that includes diversity topics such as supporting staff with mental health problems or on long-term sick leave. ■ Range of recruitment activities, including reviewing recruitment contracts for new suppliers to ensure ED&I

	<p>requirements are fully embedded, reviewing our job language and brand (including with staff networks) and testing recruitment approaches (open evenings etc) with recruitment approach for interns and apprentices.</p> <ul style="list-style-type: none"> ■ Embed ED&I deliverables and outcomes in the workstreams under IIP and monitor effectiveness of these deliverables within the IIP Board. ■ Achieve Disability Confident level 1.
	<p>Stage 2: (2021-2022): Piloting and learning</p>
	<ul style="list-style-type: none"> ■ Launch new ED&I strategic objectives together with measures and KPIs. ■ Develop data analysis that provides diversity demographics and perceptions insight to help build our evidence base across all protected characteristics. ■ Implement findings of the learning needs analysis including initial work to scope out and deliver a curriculum on ED&I. ■ Implement changes to compliance including changes to the Equality Analysis process. ■ Implement changes to the governance of our ED&I work ensuring there is a robust governance model in place that delivers scrutiny, oversight and ownership of our work. ■ Review exit interview process to gather intelligence and insight on whether there are issues or trends for particular groups who share protected characteristics. ■ Range of recruitment strategy activities including targeted campaign pilots, graduate programme, and attraction activities like updating web pages based on 2020 review. ■ Engage leadership – rollout/implementation of how leaders can mobilise on the agenda. ■ Review of induction.
	<p>Stage 3: (2023-2024): Mobilise and mature</p>
	<ul style="list-style-type: none"> ■ Develop our maturity by using our evidence base to explore intersectionality. Identify targeted interventions based on

	<p>data modelling and the progress we make against meeting the measures and KPIs in our ED&I strategic objectives.</p> <ul style="list-style-type: none">■ Achieve Disability Confident level 2 (2023); Disability Confident level 3 (2024).■ Implement induction changes from 2022.
2025 - Evaluate	<p>Stage 4 (2025): Evaluation</p> <p>Re-evaluate our maturity against the TIDE framework to give us a sense of the progress we have made.</p>