

Review of Diversity memberships, benchmarks and awards

Action	To approve
Purpose	An update on the review we have undertaken of diversity memberships, benchmarks and awards.
Decision Trail	There has been no previous formal governance or reporting on the decisions we make annually to invest in memberships, benchmarks, and awards. Following a significant level of interest externally and from Council in our memberships, we have strengthened governance and oversight through reporting proposals to both the ED&I Steering Group and Executive Board.
Recommendation(s)	a To approve the decision-making principles for memberships, benchmarks, and awards at Annex A. b To approve the proposed membership organisations for 2022 – 2023 (see paragraph 11). c To note that within the above recommendation, we are proposing to pause our membership with Stonewall for 2022 – 2023 but remain open to consider membership in future years. d To delegate the annual review of diversity memberships, benchmarks and awards back to the ED&I Steering Group.
Annexes	Annex A: Decision making principles for diversity memberships, benchmarks and awards.
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Background

- 1 Previously we haven't had a fixed approach or criteria to inform which organisations we are members of (or the diversity benchmarks that we complete). We review our memberships annually and make our assessment based on how often we have drawn on their advice, tools or support in the preceding year and a forward look of our priorities and demands. They are only advisory and we critically assess the advice they give to form our own view (drawing on legal advice where this would be required). Being a member of an organisation does not infer any affiliation to that organisation – memberships are merely advisory and their views are balanced with those of internal and external stakeholders where needed.
- 2 We have also seen a level of external scrutiny over the past year following several high-profile organisations withdrawing from Stonewall's Diversity Champions (employment / workplace) programme and a series of subsequent freedom of information (FOI) requests seeking information about our membership of Stonewall.
- 3 These activities have provided a prompt to embark on a more formal review of our diversity memberships, the scope of which included diversity memberships and their associated benchmarks, and the diversity awards that we might want to consider in the future.
- 4 One important output from this review is the development of principles setting out our rationale for our decision making which should help build confidence both internally and externally in the fairness and transparency of the decisions that we make.
- 5 We engaged with a range of stakeholders from across the organisation e.g., diversity staff network chairs, HR, L&OD, SC&E to inform this review and supporting principles. We will take a balanced view in applying the principles, looking at the specific circumstances, to ensure we take all relevant factors into account in our decision making.
- 6 However, memberships are just one way of us obtaining expertise and insight on ED&I. We also rely on networking and sharing best practice with external diversity groups and organisations.

Diversity Memberships and Benchmarks

- 7 **Memberships** mainly help us as an employer and with our internal inclusion agenda. They provide a range of resources e.g. toolkits, newsletters, training and events which help us to keep up to date with employment related practices and new legal precedents. They can also be valuable for benchmarking. **Annex A** (which sets out proposed decision-making principles for memberships, benchmarks and awards) also includes a summary of how we have used our membership organisations in the past.
- 8 **Benchmarks** can be completed without taking membership, but membership brings benefits in relation to support that can be provided to interpret and implement the findings of the

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benchmarking exercise. The key driver for participating in benchmarking is to deliver organisational improvements although some organisations use them as a competitive differentiator or reputational lever.

- 9 We have undertaken horizon scanning to inform this review – from this we are aware of four other membership organisations (e.g., Inclusive Employers and Working Families) that we could sign up to in addition to the ones we are already part of. Our approach will be to either start, pause or continue membership with an organisation - pausing gives us space to re-evaluate and take stock if needed. This is no different to what we do currently, and we have previously paused memberships where we have identified we would not have a specific use for them in any given year or where we need to make cost savings.

Recommendation: Approve the decision-making principles provided at Annex A for diversity memberships, benchmarks, and awards.

- 10 We have used the principles to identify the organisations that we think will provide the insight, knowledge, resources, and value for money to assist us in delivering our strategic priorities next year. These are:

- **Business Disability Forum (BDF)** to inform the development of Disability Confident and the targets that we will begin to explore on disability. They will also inform the ED&I data improvement project in relation to the categories for collecting disability data and the subsequent work that we want to do to improve the use of the Communications Needs tab on Siebel (where disability and reasonable adjustments are captured).
- **Business in the Community (BITC)**. Although agreed separately and out of scope of this specific review, the Responsible Business membership will continue to support our Corporate Social Responsibility (CSR) activities. The membership does include race and gender so we will seek advice on our race employment targets and gender and ethnicity pay gaps where needed.
- **Employers Network for Equality and Inclusion (ENEI)**. We committed to SMT when they agreed our 5-year inclusion programme in 2019 that we would repeat the ENEI's TIDE (Talent Inclusion and Diversity Evaluation) benchmark in 2023 to track the progress we have made to becoming a more inclusive organisation.
- The **Discrimination Law Association** provides specialist information on legal cases in one place which is essential for the ED&I team's role and for HR – we have already signed up for 2022-2023.

Recommendation: To approve our membership organisations for 2022 – 2023.

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Stonewall

- 11 In relation to Stonewall, we are recommending pausing membership. We are not expecting any specific employment priorities next year for which we would need expertise from Stonewall. Our current projects which have LGBTQ+ considerations (diversity data improvement and sex, gender and gender identity projects) will be supported by engagement with a range of partners, of which Stonewall is one. Our decision is not based on the media coverage around Stonewall and their policy positions, rather the value for money we would gain from membership in 2023.
- 12 We are committed to tackling the inequalities faced by LGBTQ+ communities both as an employer and a regulator. Stonewall have always provided us with helpful advice, and we will consider re-joining Stonewall's Diversity Champions Programme in the future, to enable them to support our corporate strategic priorities.
- 13 We acknowledge that pausing membership will be of concern to some colleagues internally, and this has been discussed with key people from the relevant networks. The rationale for our decision making must be clear for colleagues and provide reassurance that we remain committed to addressing inequalities faced by LGBTQ+ staff, doctors and patients and that we will continue to engage with a range of external stakeholders (including Stonewall) to inform our work.
- 14 We, (along with other regulators), received FOI requests at the height of the media activity and when organisations such as the Equality and Human Rights Commission and the Cabinet Office began withdrawing from the Stonewall workplace scheme. The NMC published a statement on 31 January following a letter and petition they received from Woman's Place UK calling on their withdrawal from the programme. We align with the position put forward in the statement that membership does not affect our ability to regulate fairly, we are not 'affiliated' to Stonewall and that we take a balanced approach to their views engaging with other organisations. We will liaise with internal/external comms to identify the most effective communication channel(s) if the recommendation is approved by EB, and ensure an update is included in the CEO report at the November Council meeting.

Recommendation: To pause our membership with Stonewall for 2022-2023.

Awards

- 15 At the same time as reviewing our memberships, we also took the opportunity to undertake some horizon scanning in relation to diversity awards, as other regulators, including the NMC and GOC, have begun participating in diversity award schemes. The scanning identified 11 potential award schemes covering the diversity agenda – we will explore these in more detail in 2023 with other internal stakeholders e.g., diversity staff networks, SC&E, HR etc, to identify if any would achieve impact and add value.

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Next Steps

- 16** We have identified that we need to better use, promote, and evaluate diversity resources from membership organisation across the GMC. The ED&I team are taking this forward and this will include adding relevant resources to the ED&I curriculum on Aspire (as part of our learning needs analysis activities).
- 17** During the horizon scanning exercise we identified 2 organisations (Inclusive Companies and Vercida) who provide recruitment platforms – these will be reviewed by the resourcing team in line with our broader people resourcing strategy.
- 18** We will work with internal stakeholders to build and enhance our connections with diverse groups, networks and organisations. This will ensure that we complement our memberships and broaden our range of sources to obtain the ED&I expertise that we need.
- 19** We will revisit diversity awards early next year and seek views from a range of internal stakeholders including HR, the ED&I Steering Group, diversity staff networks and SC&E to inform any decisions we make.
- 20** Although the review process is annual, we always keep a watching brief on external developments, and we can review our position at any time during a year if this becomes necessary.
- 21** We have committed to seeking approval from EB annually on our memberships, but if the board are content with the robustness of the new decision-making principles, there is an option to delegate the annual review and approval process back to the ED&I SG.

Recommendation: Delegate the annual review of diversity memberships, benchmarks, and awards back to the ED&I SG.