

## Equality, diversity and inclusion policy

### Purpose of this policy

This policy sets out our approach to being an inclusive and fair regulator.

Our equality objectives are embedded in our 2021–25 [corporate strategy](#). We are committed to fostering a culture of equality, diversity and inclusion (ED&I) in everything we do as a regulator and as an employer\*.

ED&I are critical to being an effective regulator. Our functions are set out in legislation. We work to protect patient safety and support medical education and practice across the UK. We do this by working with doctors, employers, educators, patients and other key stakeholders in the UK's healthcare systems.

We make regulatory decisions, develop policy and standards that directly impact both individuals and the wider systems in which medical professionals are educated, trained and work - including registering and licensing, revalidating, and investigating concerns. We also make decisions that indirectly impact care through providing advice on standards of conduct, performance and ethics.

### Our commitments and obligations

We will make sure fairness underpins the delivery of all our regulatory functions:

- we aim to treat anyone who we interact with fairly, without bias or discrimination,
- we use our standards to support fairness in the education and training of doctors and in treatment and care for patients, and
- we also aim to make sure professionals experience fair, and inclusive treatment in their education and training.

\* As an employer we have a separate Equal Opportunities Policy.

We aim to demonstrate that we are a fair regulator and that decisions are made without unlawful discrimination. We will not unlawfully discriminate against any individuals including those who share protected characteristics in line with the Equality Act 2010. These protected characteristics are race, age, sex, disability, sexual orientation, gender reassignment, religion or belief, pregnancy and maternity and marriage or civil partnership. We also aim to demonstrate compliance with other equality legislation across the UK relevant to our regulatory functions.

In line with section 149 of the Equality Act 2010, we will demonstrate due regard to the general equality duties to eliminate unlawful discrimination, harassment and victimisation, and advance equality of opportunity and foster good relations as between people who share protected characteristics and those who do not.

Equality is a key human rights principle. We will maintain due regard for articles in the Human Rights Act 1998 applicable to our role, and we will embed human rights principles into our decision making.

## How we meet our commitments

[Our organisational values](#) of integrity, excellence, collaboration, transparency and fairness underpin how we work. All of our people and associates have responsibility for ensuring in their work, be it in decision-making, policy development, or interactions with others, they:

- actively consider equalities and challenges bias
- respect people and treat them fairly
- are open and accountable for their actions.

### Actively considering equalities and challenging bias

We will make sure our services, policies, guidance and processes are designed to be free from bias and discrimination and we will assess our decision making for evidence of fairness, bias and discrimination. We do this through:

- making sure our services, policies, procedures and practices are designed to be fair and are subject to robust evidence-based equality impact assessment
- making sure the information available to support policy development and regulatory decisions is relevant and sufficient to enable a full and fair policies are developed and fair decisions made
- use our powers to seek information and assurance on ED&I, including considering fairness and bias in the information and evidence we review in policy development and regulatory decision-making

- making sure the technical and behavioural competencies are defined within roles and at different levels and reflected in performance objectives and job descriptions for our people
- giving our people, [GMC associates](#) and [Medical Practitioners Tribunal Service associates](#) with the right training on an ongoing basis to promote fairness in their work
- defining and authorising named regulatory decision-makers
- considering each regulatory decision on its own merits, on an objective analysis of the facts, and in accordance with our policies, guidance, and criteria
- applying our conflict-of-interest policies to our staff and associates.

### **Respecting people and treating them fairly**

We will consider the health, wellbeing, and individual needs of people and tailor approach wherever reasonable to meet those needs.

We will work with stakeholders and the public to inform our work and anticipate the diverse needs of those who engage with our services.

We will make sure that we provide enough information so that all those who may be affected by a decision we make, or by our policies and procedures (that define how we perform our functions), can understand how the process will operate and how to prepare for and participate in them.

We will make sure people understand the nature of the decision, what the decision-maker is basing their decision on and the reasons for the decision. We will provide an opportunity for those affected to make representations before the decision is taken.

We will do this through our:

- support services for medical professionals and patients which provide information and advice to members to the public, patients and medical professionals when we're investigating a concern
- by tailoring our approach to vulnerable medical professionals and patients and by providing safeguarding support for our people when it's needed
- dedicated contact centre and our websites\* offering help and advice on how we work, including specialist advice on our ethical guidance

\* [GMC website](#) and [MPTS website](#)

- [our approach to making reasonable adjustments](#) for people with disabilities to make it easier for diverse groups to engage with us
- our communications, which aim to be clear and empathetic.

## Being open and accountable for our actions

We will be transparent about our policies and procedures and our decision-making. We have put several steps in place to make sure our policies, processes and decision making is fair. Our decisions are based on the application of our policies and guidance which are:

- developed with participation from relevant stakeholders
- available or published and transparent
- applied consistently and subject to monitoring and scrutiny.

We do this through:

- monitoring the diversity of those who engage with our services and the impact of our processes on different groups
- monitoring and auditing our decision-making processes; and reviewing our supporting criteria and guidance to assure their fairness and consistency, including undertaking and publishing regular independent fairness audits
- publishing equality and diversity data and analysis in our [research](#), [data reporting tools](#) and reports, eg in [The state of medical education and practice in the UK](#)
- making available or publishing our decision-making criteria and guidelines
- publishing our decisions where the decision to publish them is legal, fair, and reasonable
- documenting our formal appeals processes and [publishing related guidance](#)
- having an [established process for people who want to complain about our work](#), including providing accessible easy read guidance. We're also committed to making improvements based on the feedback we receive, consistent with ISO10002.\*

\* ISO 10002:2014 **provides guidance on the process of complaints handling related to products within an organisation, including planning, design, operation, maintenance, and improvement.** The complaints-handling process described is suitable for use as one of the processes of an overall quality management system.

## Roles and responsibilities

Our [governance handbook](#) sets out our governance framework including our responsibilities for ED&I. Our decisions are only taken by those who are authorised to do so under our 'Schedule of Authority' contained within the handbook.

Key roles and responsibilities are:

- a Council** – our governing body which approves our strategic ED&I and make sure fairness is promoted in all the organisation's work including decision making.
- b The executive team** – comprising of the Chief Executive and directors who are responsible, as the Executive Board, for defining our ambition and driving progress on ED&I as a regulator and as an employer.
- c The ED&I team** – who are accountable for making sure we meet legal and good practice standards for ED&I; and for developing a culture of fairness and inclusivity for both staff and those we come into contact with as a regulator.
- d Managers** – are responsible for making sure this policy is complied with, and that our regulatory activities are designed and delivered fairly and respond to diverse customer needs.
- e All employees and associates** – are accountable for making sure we meet legal and good practice standards for ED&I; and demonstrating fairness and inclusivity towards those we come into contact with as a regulator.

## Considering concerns of discrimination or unfairness

We will consider appeals and complaints with due regard to the fairness of an outcome and whether bias has been a factor. All parties involved in appeals will have an opportunity to state their case and to explain why they think the outcome is wrong or unfair, or where they felt the procedure or process was unfair, and also present new evidence if they have it.

We will act on learnings from complaints or appeals to improve our guidance, training, communications and processes, when we identify that we could do things better.