

Equality Impact Assessment (Level 2)

For background information on how to complete this form, read **Appendix 2**. Delete **guidance text** as you complete the form. Guidance text is suggested (not required) content.

Section 1: Project overview

Project title: Guidance on social media review	
Name of assessor: Rosemary Flowers-Wanjie	Version: 1

What are the intended outcomes of this work?

The review is intended to:

- make any necessary updates to the current guidance that reflect changes within health and care practice and how health and care professionals use social media.
- ensure that the current guidance is fit for practice, particularly taking accessibility and relevance into account.
- gain insight into how we can better communicate the guidance and promote good use of social media by health and care professionals.

Who will be affected?

Once any changes to the standards are implemented:

- the guidance will be available for registrants to better their understanding of our standards and appropriate ways to use social media.
- prospective students for approved programmes may use the guidance to inform their studies and prepare them for practice.
- employers will need to be aware of the revisions to understand what is expected of HCPC registrants using social media.
- HCPC employees and partners will be able to use the guidance to help inform their work for example, when following fitness to practice procedures.

Section 2: Evidence and Engagement

Lack of data should not prevent a thorough Equality Impact Assessment (EIA). Be proactive in seeking the information you need.

What evidence have you considered towards this impact assessment?

1. The HCPC registrant database has provided us with information regarding the protected characteristics of our registrant population.¹

¹ [Diversity Data Report 2021 | \(hcpc-uk.org\)](https://www.hcpc-uk.org/diversity-data-report-2021)

2. We held workshops (1 – 9 September 2022) and an online survey (12 August – 9 September 2022) to external stakeholders – registrants, students, professional bodies, trade unions, employers, education providers, services users and the public – has provided us with information regarding how the Standards are used and understood in practice.
3. We sought guidance from the HCPC Equality, Diversity and Inclusion (EDI) Forum. Members of the Forum are external stakeholders with expertise in EDI and lived experience. Membership includes registrants and EDI professionals in relevant stakeholder organisations. We will also seek feedback from patients and service users
4. We sought feedback from the HCPC Professional Bodies Quarterly Forum and through our regular engagement with other health and care regulators.
5. Internal discussions with the HCPC Council and other committees have informed these proposals.
6. We sought legal review of the previous guidance and have applied their recommendations to the proposed guidance.

How have you engaged stakeholders in gathering or analysing this evidence?

- There are three stages of our stakeholder engagement: pre-consultation; consultation and post consultation and implementation.
 - The external stakeholder groups targeted by our engagement include:
 - Professional bodies
 - Education Providers
 - Trade Unions
 - Employers
 - EDI Forum
 - Service users and Patient Interest Groups
 - HCPC Partners
 - Students
 - External stakeholder activities include:
 - Presentation to professional bodies quarterly meeting in June 2022
 - Pre-consultation workshops with each identified stakeholder group 1 – 7 September 2022.
 - An online pre consultation survey for external stakeholders ran from 21 August 2022 – September 2022 and gather information

regarding the understanding of the Standards and any concerns that stakeholders wish to raise.

- We will carry out a 12-week consultation that will include a draft of the proposed guidance based on analysis following our engagement with stakeholders and internal discussions. The consultation will ask respondents to reflect on how the proposed guidance will support their use of social media.

The consultation will specifically ask for additional information about the potential positive or negative equality impacts of these proposals and for information about potential mitigations to any identified negative impacts on protected characteristics.

- We will hold external stakeholder workshops throughout the consultation period. These will be thematic with the intention of enhancing understanding of the proposals and increasing engagement.
- We will continue to seek feedback on our proposals from the HCPC's EDI Forum. We will also seek feedback from patients and service users.
- Proposals have been discussed with HCPC committees and Council.

Section 3: Analysis by equality group

The Equality and Human Rights Commission offers information on the [protected characteristics](#).

Describe any impact to groups or individuals with the protected characteristics listed below that might result from the proposed project. Draw upon evidence where relevant.

For all characteristics, consider **discrimination, victimisation, harassment and equality of opportunity** as well as issues highlighted in the guidance text.

Age (includes children, young people and older people)

The spread of misinformation online, especially relating to health and care, was a common theme and concern throughout our stakeholder workshops. We have therefore proposed updates to the guidance on Standard 2.8 to tackle misinformation.

Children and young people and older people who are vulnerable are at risk to the spread of misinformation. The proposed changes we have made explain that registrants are responsible for ensuring that the information they post is likely to be accurate and true. We anticipate that these changes will have a positive impact on service users who are children and young people and older people who are vulnerable.

We have updated our guidance on Standard 5.1 to clearly state that registrants must think about confidentiality when using either a personal or professional account. This

is especially important for vulnerable service users who may be more at risk if their personal information is shared online.

Our proposed changes to guidance relating to Standard 1.9 are anticipated to have a positive impact on service users who are more vulnerable to inappropriate online relationships. The proposed changes we have made explain that registrants should take an active role in maintaining professional boundaries when online and make registrant responsibilities clearer.

We have proposed changes to the guidance relating to Standard 1.6 to make it clear that registrants should think about the impact of their posts before they share them. This is anticipated to have a positive impact on people who are at risk of discrimination based on their age. The changes proposed ensure that registrants understand that their personal views shared on social media should not lead to the restriction of services for others.

Disability (includes physical and mental health conditions. Remember ‘invisible disabilities’)

Our proposed changes to the guidance are anticipated to positively impact registrants with disabilities by improving the accessibility of the Standards. Furthermore, we intend to engage registrants with disabilities to assess the guidance and provide feedback to ensure it is accessible to a diverse group of people with various reading abilities.

We have made specific changes to make the guidance easier to follow and understand. For example, we have changed the structure of the guidance to make the primary purpose of the document clearer. We have also simplified the “About the Standards” section to only refer to the standards and their purpose. We have also added links throughout the document to help readers find further information more easily.

The spread of misinformation online, especially relating to health and care, was a common theme and concern throughout our stakeholder workshops. We have therefore proposed updates to the guidance on Standard 2.8 to tackle misinformation.

People with disabilities are at risk of being harmed through misinformation concerning their or other’s disabilities. The proposed changes we have made explain that registrants are responsible for ensuring that the information they post is likely to be accurate and true. We anticipate that these changes will have a positive impact on people with disabilities.

We have proposed changes to the guidance relating to Standard 1.6 to make it clear that registrants should think about the impact of their posts before they share them. This is anticipated to have a positive impact on people who are at risk of discrimination based on their disability. The changes proposed ensure that registrants understand their personal views shared on social media should not lead to the restriction of services for others.

Gender reassignment (consider that individuals at different stages of transition may have different needs)

The spread of misinformation online, especially relating to health and care, was a common theme and concern throughout our stakeholder workshops. We have therefore proposed updates to the guidance on Standard 2.8 to tackle misinformation.

Service users who are undergoing gender reassignment are at risk of being harmed through misinformation concerning gender reassignment. The proposed changes that we have made explain that registrants are responsible for ensuring that the information they post is likely to be accurate and true. We therefore anticipate that these changes will have a positive impact on service users who are undergoing gender reassignment.

People undergoing gender reassignment may be at risk of harm if their personal information is shared online. We have updated our guidance on Standard 5.1 to clearly state that registrants must think about confidentiality when using either a personal or professional account. We anticipate that these changes will have a positive impact on service users who are undergoing gender reassignment.

We have proposed changes to the guidance relating to Standard 1.6 to make it clear that registrants should think about the impact of their posts before they share them. This is anticipated to have a positive impact on people who are at risk of discrimination based on their gender reassignment. The changes proposed ensure that registrants understand their personal views shared on social media should not lead to the restriction of services for others.

Marriage and civil partnerships (includes same-sex unions)

People whose personal information has changed because of marriage or civil partnership, may be at risk of harm if this is shared online. We have updated our guidance on Standard 5.1 to clearly state that registrants must think about confidentiality when using either a personal or professional account.

We have proposed changes to the guidance relating to Standard 1.6 to make it clear that registrants should think about the impact of their posts before they share them. This is anticipated to have a positive impact on people who are at risk of discrimination based on their sexual orientation or marital status. The changes proposed ensure that registrants understand their personal views shared on social media should not lead to the restriction of services for others.

Pregnancy and maternity (includes people who are pregnant, expecting a baby, up to 26 weeks post-natal or are breastfeeding)

The spread of misinformation online, especially relating to health and care, was a common theme and concern throughout our stakeholder workshops. We have therefore proposed updates to the guidance on Standard 2.8 to tackle misinformation.

Service users who are pregnant, expecting a baby or breastfeeding are at risk of being harmed through misinformation concerning pregnancy and breastfeeding. The proposed changes that we have made explain that registrants are responsible for

ensuring that the information they post is likely to be accurate and true. We therefore anticipate that these changes will have a positive impact on service users who are who are pregnant, expecting a baby or breastfeeding.

People whose personal information has changed because of pregnancy or maternity, may be at risk of harm if this is shared online. We have updated our guidance on Standard 5.1 to clearly state that registrants must think about confidentiality when using either a personal or professional account. We anticipate that these changes will have a positive impact on service users who are pregnant, expecting a baby or breastfeeding.

We have proposed changes to the guidance relating to Standard 1.6 to make it clear that registrants should think about the impact of their posts before they share them. This is anticipated to have a positive impact on people who are at risk of discrimination based on pregnancy or maternity. The changes proposed ensure that registrants understand their personal views shared on social media should not lead to the restriction of services for others.

Race (includes nationality, citizenship, ethnic or national origins)

The spread of misinformation online, especially relating to health and care, was a common theme and concern throughout our stakeholder workshops. We have therefore proposed updates to the guidance on Standard 2.8 to tackle misinformation.

People are at risk of misinformation spreading in relation to nationality, citizenship, ethnic or national origins being popularised. This may put people of those nationalities, citizenships, ethnicities or national origins at risk of harm from others. The proposed changes that we have made explain that registrants are responsible for ensuring that the information they post is likely to be accurate and true.

We have proposed changes to the guidance relating to Standard 1.6 to make it clear that registrants should think about the impact of their posts before they share them. This is anticipated to have a positive impact on people who are at risk of discrimination based on their religion or belief. The changes proposed ensure that registrants understand their personal views shared on social media should not lead to the restriction of services for others.

Religion or belief (includes religious and philosophical beliefs, including lack of belief)

The spread of misinformation online, especially relating to health and care, was a common theme and concern throughout our stakeholder workshops. We have therefore proposed updates to the guidance on Standard 2.8 to tackle misinformation.

People are at risk of misinformation spreading in relation to religious practices and beliefs. The proposed changes that we have made explain that registrants are responsible for ensuring that the information they post is likely to be accurate and true.

People may be at risk of harm if their religion or belief is shared online. We have updated our guidance on Standard 5.1 to clearly state that registrants must think

about confidentiality when using either a personal or professional account. We anticipate these changes to have a positive impact on people who would be at risk of harm if their religion or belief were shared online.

We have proposed changes to the guidance relating to Standard 1.6 to make it clear that registrants should think about the impact of their posts before they share them. This is anticipated to have a positive impact on people who are at risk of discrimination based on their nationality, citizenship, ethnic or national origin. The changes proposed ensure that registrants understand their personal views shared on social media should not lead to the restriction of services for others.

Furthermore, the changes that we have made to the guidance relating to Standard 1.6 better reflect the limits of HCPC's interest in registrant social media posts. This will ensure that registrants who share their personal beliefs online are able to do so freely within the limits of the law.

Sex (includes men and women)

We have proposed changes to the guidance relating to Standard 1.6 to make it clear that registrants should think about the impact of their posts before they share them. This is anticipated to have a positive impact on people who are at risk of discrimination based on their sex. The changes proposed ensure that registrants understand their personal views shared on social media should not lead to the restriction of services for others.

The spread of misinformation online, especially relating to health and care, was a common theme and concern throughout our stakeholder workshops. We have therefore proposed updates to the guidance on Standard 2.8 to tackle misinformation.

People are at risk of being harmed through misinformation concerning sex becoming popularised. The proposed changes that we have made explain that registrants are responsible for ensuring that the information they post is likely to be accurate and true.

Sexual orientation (includes heterosexual, lesbian, gay, bi-sexual, queer and other orientations)

The spread of misinformation online, especially relating to health and care, was a common theme and concern throughout our stakeholder workshops. We have therefore proposed updates to the guidance on Standard 2.8 to tackle misinformation.

People are at risk of being harmed through misinformation concerning sexual orientation becoming popularised. The proposed changes that we have made explain that registrants are responsible for ensuring that the information they post is likely to be accurate and true. We anticipate that these changes will have a positive impact on people's understanding of sexual orientation.

People may be at risk of harm if their sexual orientation is shared online. We have updated our guidance on Standard 5.1 to clearly state that registrants must think about confidentiality when using either a personal or professional account. We

anticipate these changes to have a positive impact on people who would be at risk of harm if their sexual orientation were shared online.

We have proposed changes to the guidance relating to Standard 1.6 to make it clear that registrants should think about the impact of their posts before they share them. This is anticipated to have a positive impact on people who are at risk of discrimination based on their sexual orientation. The changes proposed ensure that registrants understand their personal views shared on social media should not lead to the restriction of services for others.

Other identified groups

There is a lack of HCPC data relating to registrants' socio-economic group and income. This creates challenges in the assessment of registrants experiencing disadvantage or barriers to access based on socio-economic group or income. Furthermore, socio-economic group and income were not areas of concern raised during our pre-consultation stakeholder engagement. We therefore have not included this in our review of the guidance on social media.

People may be at risk of harm if their resident status is shared online. We have updated our guidance on Standard 5.1 to clearly state that registrants must think about confidentiality when using either a personal or professional account. We anticipate that these changes to have a positive impact on people who would not want their resident status shared online.

We have proposed changes to the guidance relating to Standard 1.6 to make it clear that registrants should think about the impact of their posts before they share them. This is anticipated to have a positive impact on people who are at risk of discrimination based on their resident status. The changes proposed ensure that registrants understand their personal views shared on social media should not lead to the restriction of services for others.

Four countries diversity

It is not expected that the changes proposed will impact any one of the four countries differently.

Section 4: Welsh Language Scheme

How might this project engage our commitments under the Welsh Language Scheme?

Our revised guidance on social media, along with the commentary and consultation documents, will be available in Welsh upon request.

Section 5: Summary of Analysis

What is the overall impact of this work?

Our proposed changes aim to strengthen our approach to social media ensuring that registrants better understand the circumstances in which the guidance and our Standards apply to their use of professional and personal use of social media. The changes balance HCPC respects a registrant's right to freedom of expression and our duty to protect the public.

By making these changes we are ensuring that registrants are better equipped to use social media in a way that protects people from misinformation, restrictions on their access to health services and discriminatory views and language. This is particularly important for people who are vulnerable, who would be at risk from personal information being disclosed and people who are at risk of discrimination based on their protected characteristics.

There is also the potential that registrants with disabilities, such as people who are neurodivergent or who have comprehension challenges, and students may find it challenging to digest the changes proposed. Activities that will help to lessen this impact include workshops on social media during the consultation and implementation phases of the Standards review.

Section 6: Action plan

Summarise the key actions required to improve the project plan based on any gaps, challenges and opportunities you have identified through this assessment.

Include information about how you will monitor any impact on equality, diversity and inclusion.

Summary of action plan

Throughout the pre-consultation, consultation and post-consultation period of the review, we will engage with a diverse range of stakeholders. We have engaged with the HCPC EDI Forum to ensure that EDI issues relating to social media are raised and mitigated promptly. We will continue to engage with this group throughout the consultation period and post-consultation. Their input will be particularly helpful to plan the implementation of the proposed changes and to ensure this is done fairly across protected characteristics and nationally.

Our implementation plan will be especially important and will consider how the new changes are communicated to our external stakeholder groups.

During our pre-consultation work, external stakeholders were keen to see more explanatory material for the Standards developed. This guidance sits within HCPC's suite of explanatory materials of the Standards. They carry out an important function to explain how registrants can apply the Standards to their practise.

Below, explain how the action plan you have formed meets our public sector equality duty.

How will the project eliminate discrimination, harassment and victimisation?

The action plan ensures that we engage with a range of stakeholders and target our communications towards those who are at risk of being negatively impacted by the changes made. This engagement will help us to develop accessible and fair guidance.

It also ensures that we plan our implementation of the new revised guidance appropriately and in a way that does not disadvantage any group based on a protected characteristic. This will help us to maintain a register of fully informed registrants who follow and apply our Standards.

The guidance is intended to help to tackle discrimination, harassment and victimisation in health and care through active engagement with these issues. By implementing an action plan that ensures all external stakeholder groups understand the changes made, we are ensuring that all service users have access to health and care services in a safe and inclusive environment.

How will the project advance equality of opportunity?

The action plan includes the hosting of workshops on social media. These ensure that there is an opportunity for diverse groups of stakeholders to engage and discuss the new guidance. This will help to lessen the impact of change on those who may find change challenging.

How will the project promote good relations between groups?

The plan includes a wide range of internal and external stakeholder activities. Throughout all these activities, stakeholder groups will be brought together to discuss

and collaborate on specific issues. For example, workshops during the consultation and implementation phases will specifically discuss the use of social media in the context of the revised guidance.

Furthermore, we will publish a review of our engagement to ensure that stakeholders know where the changes that we have made originated and understand other stakeholder groups' perspectives better.