Equality & Diversity Policy

1. **Introduction**

Jill Webb Training (JWT) is committed to providing services that embrace diversity and promote equality of opportunity. Where courses are assessed, we strive to assess in a way that is based on requirements only and does not discriminate against anyone.

The purpose of this Policy is to explicitly state how this commitment and current legislations are to be applied to courses, qualifications, and assessment practices.

This policy covers three broad areas:

- **Equality** is where people are treated fairly and given an equal opportunity. It is not about treating everyone in the same way but recognises that needs can be met in different ways. Equality focuses on those areas covered by the law, namely the key areas of race, gender, disability, religion or belief, sexual orientation and age.
  The Equalities Act 2010 seeks to prevent discrimination in all these areas. We believe we all have a duty to promote equality and remove discrimination. We do this in different ways and always seek feedback. Where appropriate, we support Accredited Training Centres and Awarding Organisations (AO) to analyse candidate data
- **Diversity** is about recognising, valuing and managing individual differences to enable everyone contribute in their own way feeling comfortable with and understanding various different needs
- **Equal Opportunity** is about providing good practice guidance relating to candidates who are eligible for reasonable adjustments in activities and assessments or who require special considerations.

This Policy applies to all training courses provided by JWT.

2. **Equal Opportunities Statement**

JWT is committed to providing equal opportunity for everyone who works for or attends training or events, regardless of age, gender, race, religion, disability, ethnic origin, national origin, marital status, sexual orientation, political persuasion or trades union activity. This commitment will be informed by current UK legislation and EU directives.

It is legally and morally wrong to discriminate directly or indirectly and hinder equality of opportunity. Thus it is our intention to ensure that no person is subject to unfair treatment in any way and we recognise our responsibilities and legal obligations under all the current legislation.

3. Application of Equal Opportunities Statement

JWT will ensure equality for all learners by ensuring that:

- Responsibility for the full implementation, evidence collection, maintenance of registers and annual review of this Policy is taken by the manager of JWT. All such evidence is to be made available to any relevant AO upon request
- All qualifications used by JWT are developed by ITC and other Awarding/Certification organisations with robust equality systems
- All assessment instruments and processes will be free from any bias, and inclusive for all learners
- All Trainers/Assessors and learners are made aware of JWT's commitment to equality of opportunity. They have access to this Policy before and during the course they attend
- As many learners, and as diverse a range of learners as possible have access to JWT qualifications
- JWT learners have the opportunity to feedback to JWT after every course
- Learners can contact the AO if matters relating to alleged discrimination are not resolved by JWT directly. The contract details can be found below:

ITC	ITC First Malpractice and Misconduct Committee, Appeals Committee or Complaints Committee (Contact Details at www.itcfirst.org.uk)
CPDUK	https://cpduk.co.uk/

- JWT will work with AOs to collect sufficient data to allow the monitoring and evaluation to ensure that there is no discrimination on the grounds of race, disability and gender via learner registration and achievement documents and course evaluations
- All assessment instruments and processes used will be free from any bias

4. Diversity Statement

Diversity is about valuing and respecting the differences between learners, regardless of ability and/or circumstances or any other individual characteristic they may have.

We believe differences should be acknowledged, celebrated, and embraced to help ensure that all learners feel included in the learning process and the learning environment is suitable for all.

JWT will consider the following list whilst preparing and undertaking its training activities:

- Environment and equipment for example accessibility of venues
- When running virtual sessions, adapting the use of technology to meet the individual needs of participants
- Developing programme resources (for example providing handouts and presentations) capable of adaptation to a number of formats. While preparing resources, consideration is given to other languages, language level and jargon. Illustrations should reflect the potential diversity of learners
- Information should be accessible to all
- Liaising with others for example language interpreters may be required or staff who can use sign language
- Feedback and evaluations is obtained from all learners to ensure that current practices are responsive to their needs and any barriers to learning identified and mitigated

5. Summary of Procedures During Sessions Which Involved Assessment

JWT will ensure that assessment practice will be based on award requirements only and will not discriminate against anyone.

Learners with Individual Assessment Requirements

JWT is committed to providing equal opportunity and freedom from discrimination. Requests for reasonable assessment adjustments, by individuals with special needs, can be applied for using the relevant paperwork for the AO. The Centre Manager at JWT will determine if the request is acceptable or may refer a request to the AO to ask them to assist in the decision making process.

JWT will ensure that the reasonable adjustments arrangements will be valid and reliable, designed to reflect the learners' competence to meet the assessment outcomes of the qualification and for the employment for which the qualification is designed.

The Centre Manager at JWT will review all requests for reasonable adjustments and forward them to the relevant AO along with learner registration and evaluation documents.

6. When a Qualification is Not Awarded - Impact Conclusions

- The onus is on Tutors/Assessors, JWT and the AO to demonstrate that the reason for not awarding a qualification was a non-discriminatory one
- There is no duty to make any adjustment to a provision, criterion or practice of any kind that is a competence standard. However, the duty does not apply to the process of demonstrating that a person meets the competence standard. The competence standard and method of assessment are separate and reasonable, fair adjustment has to be made where reasonable
- JWT has a duty to make reasonable adjustments as outlined above

7. Special Considerations

If the course or candidate assessment is disrupted for unforeseen reasons beyond Tutor/Assessor or learner control then special considerations can be considered, to ensure that learners are treated fairly in accordance with current guidelines from ITC and the regulatory authorities. For learners on JWT courses and courses where additional special consideration is required then they will be subject to this guidance.

Special considerations are any short term unforeseen events that happen during the assessment of the course. Some examples of this could be:

- fire alarm
- the key holder being late
- unforeseen noisy intrusive building work close
- sudden sickness/illness and the like

Typically, a one off short-term solution is found such as changing rooms or buildings, extending the working session by a short time or adding additional time to the training programme by negotiation. Attending a later date course for completion is also a possibility as long as timescales are appropriate depending upon specific qualifications.

If learners are unable to attend scheduled assessments for these or similar reasons, then an alternative date for assessment may be made for the learners, normally within 6 weeks of the original date. The assessment process can thus be deferred to a time when the individual candidate has recovered from their indisposition, temporary illness or injury or the environment has again become conductive to training and assessment for the whole group.

All such events need to be recorded on the relevant form and made available to relevant personnel in the AO. This document is normally completed during or immediately as is practicable after a training and assessment course. Additional guidance on making a decision on special considerations is found at Appendix A.

8. Data Collection

The protocols JWT use in relation to data collection are set out in the Information Management and Privacy Policy. In addition to these, in relation to Equality and Diversity please note:

- As a provider of recognised and approved regulatory training activities, JWT has to have procedures in place to collect sufficient data to allow the monitoring and evaluation of compliance with the requirements of equalities legislation and to ensure that there is no discrimination on the grounds of race, disability and gender
- All course documents are continually developed to enhance both learner consultation and data collection
- It is JWT and AO policy that all information and data be shared with the regulatory authorities upon request

9. The Equality Act – Definitions About Disability

Under the Equality Act 2010 someone is considered disabled if they have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities.

- 'substantial' is more than minor or trivial – for example it takes much longer than it usually would to complete a daily task like getting dressed
- 'long-term' means twelve months or more, for example a breathing condition that develops as a result of a lung infection

10. Candidate Procedures

For any matter arising from or relating to this Policy during a training course, candidates should:

- Inform the Trainer delivering the course. Most matters can be resolved at this level. Minor concerns can be addressed by having a chat with the Trainer or making a comment in the Course Evaluation Form
- If the concern is about a reasonable adjustment the AO should be contacted for support as shown above
- At any time, if a learner is not satisfied they can make a complaint following the process set out in the JWT Complaints Policy

11. Guidance

- JWT can request that an AO adjust the assessment process to allow the learner an opportunity to reach the standard. However, we will also ensure that the reasonable adjustment does not give the learner an unfair advantage
- Individual adjustments may be required for a number of reasons, including:
    - Temporary or permanent illness or injury
    - Sensory impairment
    - Reading and/or writing difficulties
    - English as a second language
    - Recent bereavement
    - Other extenuating circumstances

  JWT will inform the relevant AO where reasonable adjustment requests are made. The relevant AO paperwork will be completed and forwarded to the AO at least 5 working days prior to the assessment. Decisions will usually be made by the AO and communicated to JWT. JWT may appeal against any decision made by the AO. Appendix B lists Specific ITC course forms.
- If learners are unable to attend scheduled assessments for justifiable extenuating circumstances, then an alternative date for assessment may be made for the learner. The assessment process can thus be deferred to a time when the learner has recovered from their indisposition, temporary illness or injury. All such events will be recorded on the relevant form and forwarded to the AO with all assessment evidence and copies of the event will be made available to the external quality assurer (EQA)
- For some qualifications for example, first aid, where the learners are assessed in real time scenarios, as the course progresses this assessment opportunity normally requires learners to attend part of another training course for the qualification. Due to the 'real-life' practical nature of first aid qualifications, regardless of the extenuating circumstances, the learner must demonstrate competency up to the minimum standard to be awarded the qualification.
- JWT will monitor equality of access to assessment by requesting that all learners complete an assessment evaluation section on the end of Course Evaluation Form
    - If the request for adjustment is made on the day or the course, or less than 4 days before the course JWT will work with the relevant AO to agree a way ahead, and record this in line with the AO policies

12. Minor and Routine Occurrences

- Routine reasonable adjustment to assessment decisions will be made by JWT and all such decisions will be recorded the relevant AO documentation and forwarded in line with their procedures
- For routine minor illness, injury situations or similar close to the time of assessment JWT can, at its discretion, choose to adjust the time of the assessment (for instance by asking the learner to attend a session from another course and record such decisions in the 'Specific Reasonable Adjustment to be made' box on the relevant paperwork which will then be sent to the AO and a copy kept by JWT which can be shared with the AO on request

13. Temporary Indisposition

- Learners occasionally present with a temporary problem that might impede their performance during a course for example, recovering from surgery, lower back pain, damaged joint, muscle pain, digestive system upsets, migraine, occasional seizure, diabetic episode or faint
- JWT will make a minor reasonable adjustment to normal activity in order to provide every opportunity for the candidate to demonstrate their capability. Some examples are:
    - A learner presents with lower back pain, they are unable to bend down to a simulated casualty comfortably. The Assessor/trainer will negotiate with the learner and if possible arrange a suitable support to be present so that the learner can perform and practice. However, the learner must be assessed performing on an unresponsive simulated casualty lying on the floor. Similarly, a CPR manikin can be placed upon the table to practise but assessment must take place with the manikin on the floor. As the course develops and the learner performs in a variety of situations appropriate terrain and simulated first aid scenarios can be arranged. For example, the casualty could be placed upon a safe rocky ledge or the learner could stand in a safe ditch.

A learner might be distracted eg, due to bereavement and miss something that a Tutor says. The Tutor might agree to spend some extra time at lunchtime helping the learner to deepen their understanding.

- These minor reasonable adjustments to normal procedure are typically left to the judgement of the Tutor/Assessor at the time, as guidance cannot be given for every potential occurrence. The relevant AO forms should be completed as described earlier
- If the situation is beyond the experience of the Trainer or JWT and the situation necessitates immediate advice then JWT has the option of phoning the AO for advice

14. Evidence of Indisposition

All supporting evidence for example, an original Doctor's Note will be archived by JWT unless specifically asked for by the AO.

15. Appeals Against Refusal to Allow Reasonable Adjustments

- If a learner disagrees with the decision by JWT they should contact JWT about this
- If there is disagreement with the AO decision, JWT will contact the AO for informal dialogue
- For appeals against the AO reasonable adjustment decisions JWT will refer to the referral AO appeals procedure

16. Potential Impact of a Qualification, Training and/or Assessment Upon Disabled People

This Policy has been developed in line with guidance documents which include those on the Equality & Human Rights Commission website: http://www.equalityhumanrights.com/

This Policy will be reviewed every three years or earlier if a change in legislation, working practices or feedback from clients or partners necessitates.

This Policy was reviewed and updated in August 2024.

Appendix A
Parameters For Making A Decision Around Reasonable Special Considerations

Decision Parameters

The following guidelines outline the parameters within which to make various decisions around special considerations. It is recognised that by the nature of events the relevant AO or JWT paperwork will in all probability be a retrospective occurrence.

Things which might fall under this category:

- Danger to the learners
  For example – break out of fire, a fire alarm, flood or spread of noxious fumes then the trainer will immediately remove the group from danger. If the event is not temporary and easily dealt with by returning to the building upon the 'all clear', or changing rooms then the session may well be cancelled and the JWT Manager informed immediately by telephone. All course learners will be given opportunity for training and assessment as soon as reasonably practicable afterwards.
- Intrusive events or noise
  The course venue may be able to moved. Additional time may be allocated. Training and assessment opportunities may be presented to the group on alternative dates.
- Temporary indisposition of individuals
  Guidance is produced for access to training and assessment earlier in this policy. The relevant AO forms must be completed to confirm the decisions made.

These special considerations treat learners fairly and give them every reasonable opportunity to fulfil the training and assessment requirements of the qualification.

Whatever decision is made regarding moving or deferring training and assessment, the minimum training and assessment requirements must be met.

If in doubt as to any decision JWT will contact the AO immediately.

Appendix B
Specific ITC Course Forms

Learner Registration Form (02)	a) Each learner is asked to complete a Registration Form giving details of: • Gender - (tick box) • Special needs or reasonable adjustments requested (text box) • Ethnicity - ethnic group definitions based upon 2011 census question (tick box)
Learner Evaluation Form	JWT hands out hard copy evaluation forms at the end of each session. The results are compiled and shared with the trainer for their own personal development. These are shared with ITC on request. After the course is complete, each learner is emailed an end of course evaluation form by ITC. Answers are entered to the ITC website which allows JWT training courses to be analysed in relation to the information asked for. Learners have an opportunity to add an 'amplified comment' to possible areas of concern, each comment received is scrutinised by the JWT Manager. Any area for concern is investigated. Specific questions ask for a learner response relating to: ○ The assessment component of the qualification ○ The teaching component of the qualification ○ The qualification courses materials ○ Special adjustment requirement
Access to Training & Assessment Form (C4)	Each completed form will be forwarded to ITC.
Special Considerations Form (C7)	Each completed form will be forwarded to ITC.
Awarding Body Annual Assessment by Providers and Centres Feedback Form (F2)	Each completed form will be forwarded annually