

# Swim Wales Training and Development Diversity & Equality Policy

## DOCUMENT STATUS

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## DOCUMENT CONTROL INFORMATION

Change History		
Version	Date	Details of changes
V2	12/02/2019	Amendments to existing policy
V3	16/05/2019	Amendments to existing policy
V4	02/04/2020	Amendments to existing policy
V5	18/09/2020	Amendments to existing policy

**Swim Wales** is committed to the principles and practices of equal opportunities as a service provider. All Swim Wales members of staff, Internal Verifiers, Centre Reviewers, Educators, Volunteers, Members, Suppliers and Contractors, whether permanent or temporary (referred to as "Stakeholders") are responsible for the promotion and advancement of this policy.

We recognise the need to acknowledge the diversity of provision and are committed to the elimination of discrimination on the grounds of religion, belief, race, ethnicity, gender, age, marital or civil partnership status, pregnancy and maternity, sexual orientation, gender reassignment, disability, ability, occupation, political opinion, those with / without dependents or on any other grounds or status (referred to as "protected characteristics").

### **Policy aim and purpose**

We will not tolerate any unlawful discrimination or other unfair treatment (Appendix 1), whether intentional or unintentional, direct or indirect towards any Learner. Therefore this policy has been produced with the aim to prevent and address discrimination through the establishment of handling procedures for evaluating and / or investigating allegations of harassment, bullying or grievances, incurring corrective action via sanctions and / or penalties where required.

### **Objectives**

To ensure equality, diversity and inclusive practices are implemented across the breadth of Swim Wales operations, the following objectives have been developed to ensure the continued monitoring of qualifications for any feature which may present a disadvantage for a Learner with protected characteristics.

### **Swim Wales will:**

- Ensure this policy is effectively communicated across the governance and management structure of the organisation via inductions, orientations, continuous development and appraisal system
- Ensure continual review of the effectiveness of this policy in line with Equalities Law, taking prompt actions to rectify any deficiencies
- Ensure the policy is current, published and available to all.

### **Swim Wales will:**

- Ensure all educators publish and implement equal opportunities policies that operate in parallel to that of this policy
- Promote fair access to units and / or qualifications, ensuring all satellite centres are aware of and comply with the Swim England Qualifications (SEQ) Reasonable Adjustments and Special Considerations Policy
- Encourage reporting of allegations of direct / indirect discrimination, harassment, bullying or victimisation through the appropriate channels and handle this effectively in accordance with the Swim Wales Complaints Policy
- Recruit, train and deploy suitable Internal Verifiers to facilitate and monitor compliance with the eligibility criteria contained within the Swim England Qualifications (SEQ) Approved Training Centre and Qualification Application Form
- Effectively manage risk and performance across all activity, ensuring corrective action where required to maintain the commitment to equality and diversity across the awarding function
- Maintain quality records, analysing and reporting on data (inclusive of age, gender, ethnicity and disability) to monitor and evaluate diversity in order to ensure equality and eliminate unlawful discrimination or other unfair treatment.

### **Ensure that there are no barriers to entry of units and Swim England Qualifications. A process is in place to consult with relevant Learners, Third Party Representatives and/or appropriate advisors to ensure:**

- Units and qualifications are developed to promote inclusivity and diversity
- Entry requirements to registration are appropriate to the intended purpose of the unit or qualification
- The aims and learning outcomes of the unit or qualification are relevant and appropriate for their intended purpose and are expressed in clear, unbiased language
- The assessment criteria are relevant and appropriate to the intended purpose of the unit or qualification and, as like the aims and learning outcomes, are expressed in clear, unbiased language
- The requirements of practical demonstration of the unit or qualification are clearly and appropriately outlined. The rationale for such requirements is to be made clear and explicitly justified in terms of maintaining the integrity of the unit or qualification.
- Signposts to the Swim England Qualifications (SEQ) Reasonable Adjustments and Special Considerations Policy are clearly communicated where such barriers are identified
- Those barriers identified are alleviated and mitigated whilst maintaining the integrity and purpose of the unit or qualification
- Should any instances arise outside of Swim England Qualifications (SEQ) protocol, a process of consultation with the concerned Learner, Third Party Representative and/or the AC will be conducted
- All details of how effects of identified barriers will be alleviated and mitigated will be recorded in line with the stipulated policy.

### **Monitoring and review of the policy**

This policy will be reviewed annually to ensure it remains fit for purpose and complies with the requirements of Equalities Law in relation to all Swim England available qualifications.

The next policy annual review will take place in March 2022

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### **Appendix 1: Terms of Reference**

Unlawful discrimination can take any of the following forms.

<b>Bullying</b>	The misuse of power or position to persistently criticise, humiliate or undermine an individual's confidence.
<b>Direct Discrimination</b>	Treating someone less favourably than you would treat others because of a protected characteristic.
<b>Indirect Discrimination</b>	Applying a provision, criterion or practice which, on the face of it, applies equally to all but in practice can disadvantage individuals with a particular protected characteristic. Such requirements or conditions are lawful only if they can be objectively justified.
<b>Harassment</b>	Engaging in unwanted conduct relating to a relevant protected characteristic or unwanted conduct of a sexual nature where the conduct has the purpose or effect of violating the recipient's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for the recipient, or any other individual affected by such conduct. The Swim England Qualifications (SEQ) is committed to ensuring that its Stakeholders are able to conduct their activities free from harassment.
<b>Victimisation</b>	Subjecting someone to a detriment because he or she has in good faith taken action under the Equality Act 2010 (or equivalent legislation) by bringing proceedings, giving evidence or information in relation to proceedings, making an allegation that a person has contravened the Equality Act 2010 (or equivalent legislation) or doing any other thing for the purpose of or in connection with the Equality Act 2010 (or any equivalent legislation).

*Swim Wales regards bullying, discrimination, harassment and victimisation, as described above, as serious misconduct. Any concerns highlighted concerning equalities will be taken seriously and appropriate measures, including disciplinary action, may be brought against any Stakeholder who unlawfully bullies, discriminates against, harasses or victimises any other person.*

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