

FIRSTAID4LIFE Limited

Equality, Diversity – Equal Opportunities

Policy Document

**FIRSTAID4LIFE LIMITED advise all candidates where to find the current version of this policy via its website www.firstaid4life.com
Candidates may receive a paper version upon request.**

1. Introduction

FIRSTAID4LIFE LIMITED is committed to providing services that embrace diversity, promote equality of opportunity and assessments that are based on requirements only and do not discriminate against anyone.

The purpose of this policy is to explicitly state how this commitment and current legislations are to be applied by FIRSTAID4LIFE LIMITED to first aid training courses, qualifications and assessment practices.

1.1 This policy covers 3 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. Legislation seeks to prevent discrimination in all these areas. FIRSTAID4LIFE LIMITED believes we all have a duty to promote equality and remove discrimination in race, gender and disability. We do this by analysing statistical data and candidate/stakeholder feedback.

Diversity is about recognising, valuing and managing individual differences to enable everyone to 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.

1.2 Scope

This policy will be applied to all training courses and qualifications offered by FIRSTAID4LIFE LIMITED.

2. Equal Opportunities Statement

FIRSTAID4LIFE LIMITED is committed to providing equal opportunity for everyone who is employed by FIRSTAID4LIFE LIMITED or takes advantage of FIRSTAID4LIFE LIMITED services, 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 e.g. recognising restrictions on those working with young children and vulnerable adults.

It is 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 current legislation including the following Acts:

- Equality Act (2010)
- Special Educational Needs and Disability Act (2001/2005)
- Race Relations (Amendment) Act (2000)
- Human Rights Act (1998)
- Data Protection Act (1998)
- Protection from Harassment Act (1997)
- Rehabilitation of Offenders Act (1974)

2.1 Application of Equal Opportunities Statement

FIRSTAID4LIFE LIMITED will ensure equality for all learners by ensuring that:

- a) Responsibility for the full implementation, evidence collection, maintenance of registers and annual review of this policy is taken by the Director of FIRSTAID4LIFE LIMITED. All such evidence is to be made available to the Awarding Organisation upon request.
- b) All qualifications used by FIRSTAID4LIFE LIMITED are developed by Awarding Organisations (AO) with robust equality systems.
- c) All assessment instruments and processes will be free from any bias, and inclusive for all candidates.
- d) All FIRSTAID4LIFE LIMITED Trainers, Assessors and Candidates are made aware of FIRSTAID4LIFE LIMITED commitment to equality of opportunity.
- e) FIRSTAID4LIFE LIMITED implements this equal opportunities policy and all staff and students are aware of it
- f) As many candidates, and as diverse a range of candidates as possible have access to FIRSTAID4LIFE LIMITED qualifications.
- g) FIRSTAID4LIFE LIMITED Candidates have the opportunity to feedback to FIRSTAID4LIFE LIMITED after every course. FIRSTAID4LIFE LIMITED will archive this evidence on the AO website.
- h) Candidates can contact the AO Malpractice and Misconduct Committee or Appeals/Complaints Committee if matters relating to alleged discrimination are not resolved by FIRSTAID4LIFE LIMITED directly.
- i) FIRSTAID4LIFE LIMITED in conjunction with the AO will 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 candidate registration and achievement documents and course evaluations.
- j) This policy and statement is reviewed by FIRSTAID4LIFE LIMITED annually or more frequently if required.
- k) All information and data for review and evaluation is archived, including:
 - o Evidence of higher or lower participation by different groups by collecting candidate registration data from each course.
 - o Evidence that different groups have different needs in relation to AO qualifications by collecting candidate evaluation data from FIRSTAID4LIFE LIMITED.
 - o Authentic sample of evaluation data gathered by the AO by informing candidates that the AO may request additional confirmation from all candidates.
- l) Where a barrier to learning has been identified (through review process, EQA reports or complaints and appeals procedures being invoked, FIRSTAID4LIFE LIMITED (in conjunction with the AO) will investigate and take appropriate action (withdraw assessment material - amend/update – provide training, as necessary) and then continue to monitor the evidence.

2.2 Action Plan

An Equal Opportunities review will be conducted annually by FIRSTAID4LIFE LIMITED and an Action Plan developed when issues are identified.

3 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.

FIRSTAID4LIFE LIMITED believes 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.

FIRSTAID4LIFE LIMITED will consider the following list whilst preparing and undertaking its training activities:

- a) Environment and equipment e.g. adjustable height workstations, accessibility, CPR manikins reflecting age and/or ethnic origin of potential learners.
- b) Programme resources e.g. Handouts and presentations to be capable of adaptation to a number of formats, consider other languages, language level and jargon, illustrations to reflect diversity of potential learners.
- c) Staff development e.g. Ensuring all are well informed of current policies and procedures in good time for the knowledge to be meaningful.
- d) Information e.g. this should be accessible to all via email, notice-board or leaflet.
- e) Liaising with others e.g. language interpreters may be required or staff who can use sign language.
- f) Information may need to be shared between businesses and learners have to agree to their disclosure to be shared with legitimate agencies since the Equality Act (2010) describes the duty to comply with learners requests for confidentiality.
- g) Feedback and evaluations should be obtained from all learners to ensure that current practices are responsive to their needs and any barriers to learning identified and mitigated.

4. Assessment Practice Statement

FIRSTAID4LIFE LIMITED ensures that assessment practice will be based on award requirements only and will not discriminate against anyone.

4.1 Candidates with Individual Assessment Requirements

- a) FIRSTAID4LIFE LIMITED is committed to providing equal opportunity and freedom from discrimination. Requests for reasonable assessment adjustments, by individuals with special needs, can be applied for. FIRSTAID4LIFE LIMITED may refer to the AO who will assist in the decision making process.
- b) FIRSTAID4LIFE LIMITED will ensure that reasonable adjustments arrangements will be valid and reliable, designed to reflect the candidates' competence to meet the assessment outcomes of the qualification and for the employment for which the qualification is designed. FIRSTAID4LIFE LIMITED ensures this by issuing this policy guidance, scrutinising all adjustment requests and liaising with the AO when necessary.
- c) FIRSTAID4LIFE LIMITED will review all adjustment requests and forward them to the AO along with candidate registration and evaluation documents.
- d) There will be two timescales for adjustments requests. Where the candidate requests reasonable adjustment more than 5 working days before the training and assessment and where reasonable adjustment decisions have to be made shortly before (or even during) the initial stages of the training.

4.2 Guidance

a) FIRSTAD4LIFE LIMITED can request the AO to adjust the assessment process to give individual equality of opportunity to show that they can reach the standard. However it will also be ensured that the reasonable adjustment does not give the candidate an unfair advantage.

b) Individual adjustments may be required for a number of reasons, including:

- I. Temporary or permanent illness or injury
- II. Sensory impairment
- III. Reading &/or writing difficulties
- IV. English as a second language
- V. Recent bereavement
- VI. Other extenuating circumstances

c) FIRSTAD4LIFE LIMITED should inform the AO where reasonable adjustment requests are made. Suitable forms can be downloaded from the AO website and completed and forwarded to the AO at least 5 working days prior to the assessment. Decisions will be made by the AO and communicated to FIRSTAD4LIFE LIMITED. FIRSTAD4LIFE LIMITED may appeal against any decision made by the AO.

d) If candidates are unable to attend scheduled assessments for justifiable extenuating circumstances, then an alternative date for assessment may be made for the candidate, normally within 6 weeks of the original date. The assessment process can thus be deferred to a time when the candidate has recovered from their indisposition, temporary illness or injury. All such events need to be recorded on the adjustment and forwarded to the AO with all assessment evidence and copies made available to the AO External Verifier.

e) For some AO first aid qualifications where the candidates are assessed in real time scenarios, as the course progresses this assessment opportunity normally requires candidates to attend part of another training course for the qualification.

f) Due to the 'real-life' practical nature of first aid qualifications, regardless of the extenuating circumstances, the candidate must demonstrate competency up to the minimum standard to be awarded the qualification.

h) FIRSTAD4LIFE LIMITED will monitor equality of access to assessment by requesting that all candidates complete an assessment evaluation section on their end of course evaluation form. FIRSTAD4LIFE LIMITED will archive this information on the AO website. This gives the candidate direct feedback to the Awarding Organisation.

Note: Adjustment form relates to adjustment requests known to FIRSTAD4LIFE LIMITED **before** the training course commences.

4.3 Minor and routine occurrences

a) Routine (listed in this guidance) reasonable adjustment to assessment decisions will be made by FIRSTAD4LIFE LIMITED, and all such decisions will be recorded on the adjustment form and a copy forwarded to AO with all assessment evidence.

b) For routine minor illness, injury situations or similar close to the time of assessment. FIRSTAD4LIFE LIMITED can, at its discretion, choose to adjust the time of the assessment (for instance by asking the candidate to attend a session from another course delivered by FIRSTAD4LIFE LIMITED) and record such decisions in the 'Specific Reasonable Adjustment to be made' box.

c) This form must then be sent to the AO with all assessment evidence and a copy kept by FIRSTAD4LIFE LIMITED and made available for the External Quality Assurance visit.

4.4 Temporary Indisposition

a) Candidates regularly present themselves with a temporary problem that might intrude on their performance during an active First Aid course e.g. recovering from surgery, lower back pain, damaged joint, muscle pain, digestive system upsets, migraine, occasional seizure, diabetic episode or faint.

b) FIRSTAD4LIFE LIMITED will make a minor reasonable adjustment to normal activity in order to provide every opportunity for the candidate to demonstrate their capability. Some recent examples from AO qualifications are illustrated below:

- I. A candidate presents with lower back pain, they are unable to bend down to a simulated casualty comfortably. The Trainer will negotiate with the candidate and arrange a solid table to be present so that the candidate can perform, and be assessed performing, a casualty assessment protocol with a simulated casualty lying at hip height. Similarly a CPR manikin can be placed upon the table. As the course develops and the candidate performs in a variety of situations, appropriate terrain and simulated first aid scenarios can be arranged. e.g. the casualty could be placed upon a safe rocky ledge or the candidate could stand in a safely raised position.
- II. A candidate presents with a recently broken arm still in a plaster cast. It may be inappropriate to perform simulated CPR upon a manikin, the candidate can be assessed by performing the appropriate actions in the air space close to the manikin without making potentially damaging contact with the manikin.

c) These minor reasonable adjustments to normal procedure are typically left to the judgement of the Trainer (Internal Assessor) at the time, as there are a large number of potential occurrences and guidance cannot be given for every potential occurrence. Form adjustment must be used as described above.

d) If a copy of form adjustment is **not** available, a record is made of the decision and a comment made on the reverse side of the Course Details Form. FIRSTAD4LIFE LIMITED will keep a copy and forward a copy to the AO.

e) If the situation is beyond the experience of the Trainer or FIRSTAD4LIFE LIMITED and the situation necessitates immediate advice then the FIRSTAD4LIFE LIMITED Trainer has the option of phoning the AO.

4.5 Evidence of indisposition

f) All supporting evidence e.g. original Doctors note will be archived by FIRSTAD4LIFE LIMITED unless specifically asked for by the AO.

4.6 Appeals against reasonable adjustments to be made

a) If there is disagreement with the AO (Access to Training & Assessment request) decision then FIRSTAD4LIFE LIMITED will contact the AO Office for informal dialogue.

b) For appeals against AO reasonable adjustment decisions FIRSTAD4LIFE LIMITED will refer to the AO Appeals Policy.

5. Potential impact of an AO qualification training & assessment upon disabled people

Guidance documents investigated include those on the Equality & Human Rights Commission website: <http://www.equalityhumanrights.com/>

The scope of disability is examined and advice on how discrimination can be avoided taken from:

- I. The Equality Act (2010)
- II. Code of practice Post-16 and Code of Practice (revised) for Providers of Post-16 education and related services produced by the Disability Rights Commission, published 2007.

5.1 Impact conclusions

Key points:

- I. The onus is on FIRSTAD4LIFE LIMITED tutors and the AO to demonstrate that the reason for not awarding a qualification was a non-discriminatory one.
- II. 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.
- III. FIRSTAD4LIFE LIMITED has a duty to make reasonable adjustments.
- IV. The Equality Act (2010) does not override Health & Safety legislation.

6. Special Considerations

If the course or candidate assessment is disrupted for unforeseen reasons beyond Trainer or candidate control then special considerations can be considered, to ensure that candidates are treated fairly in accordance with current guidelines from the AO and the regulatory authorities. For candidates on FIRSTAD4LIFE LIMITED courses and courses where additional special consideration is required, then they will be subject to this guidance.

6.1 Guidance

a) Special considerations are any short term unforeseen events that happen during the assessment of the course e.g. fire alarm, the key holder being late, unforeseen noisy intrusive building work close by, sudden sickness/illness and the like.

b) 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.

c) If candidates are unable to attend scheduled assessments for these or similar reasons, then an alternative date for assessment may be made for the candidates, 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 conducive to training and assessment for the whole group.

d) All such events need to be recorded and made available to the AO External Quality Assurer. This document is normally completed **during** or **immediately** as is practicable **after** a training & assessment course.

e) With sudden unforeseen events away from the main FIRSTAD4LIFE LIMITED Centre address the onus is on the individual Trainer to make a discretionary judgement decision that may have to be made quickly. A Trainer working for FIRSTAD4LIFE LIMITED should contact FIRSTAD4LIFE LIMITED Director immediately for advice and consultation. If not available for any reason then the AO Office is in operation during normal office hours where AO staff are available for advice and consultation by FIRSTAD4LIFE LIMITED Trainers.

6.2 Decision Parameters

a) The following guidelines outline the parameters within which to make various decisions. It is recognised that by the nature of events that adjustment from completion will in all probability be a retrospective occurrence.

I. Danger to the candidates

E.g. Fire alarm, noxious fumes then the trainer will immediately remove the group from danger and 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 FIRST AID 4 LIFE LIMITED Director informed immediately by telephone. All course candidates will be given the opportunity for training and assessment as soon as reasonably practicable afterwards.

II. Intrusive events or noise

The course venue may be moved. Additional time may be allocated. Training and assessment opportunities may be presented to the group on alternative dates.

III. Temporary indisposition of individuals

Guidance is produced for access to training and assessment earlier in this policy. Form adjustment is required. Minor adjustment to normal procedure is decided upon and recorded on the reverse side of the Course Details Form. If there is a need for additional time resources for that individual e.g. the opportunity for assessment at a later time or place then form adjustment needs to be completed.

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

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

d) If in doubt as to any decision FIRST AID 4 LIFE LIMITED will contact the AO Office immediately.

7. Summary of Procedures

7.1 Candidate Procedures

a) For any matter arising from or relating to this policy, candidates should:

- I. Inform the Trainer delivering the course. Most matters can be resolved at this level. Minor concerns can be addressed by making a comment upon the course evaluation form.
- II. Inform FIRST AID 4 LIFE LIMITED in writing at their earliest opportunity if the candidate cannot easily resolve the situation.
- III. Inform the AO directly if FIRST AID 4 LIFE LIMITED cannot resolve the matter to the candidate's satisfactory.

8. Data collection

a) As a provider of recognised and approved regulatory training activities FIRST AID 4 LIFE LIMITED 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.

b) Candidate Registration and Evaluation documents are continually developed to enhance both learner consultation and data collection.

c) It is FIRST AID 4 LIFE LIMITED and AO policy that all information and data be shared with the regulatory authorities upon request.

8.1 Candidate Registration Form (02)

- a) Each candidate is asked to complete a Registration Form giving details of:
- I. Gender - male or female (tick box)
 - II. Special needs or reasonable adjustments requested (text box)
 - III. Ethnicity - ethnic group definitions based upon 2001 census question (tick box)

8.2 Candidate Evaluation Form (03)

a) Each candidate is asked to complete an end of course evaluation form. Answers are entered on to the AO website which allows FIRSTAD4LIFE LIMITED training courses to be analysed in relation to the information asked for.

- c) Candidates have an opportunity to add an 'amplified comment' to possible areas of concern, each comment received is scrutinised by the FIRSTAD4LIFE LIMITED Director. Any area for concern is investigated. Specific questions ask for a candidate response relating to:
- I. The assessment component of the qualification
 - II. The teaching component of the qualification
 - III. The qualification courses materials
 - IV. Special adjustment requirement

8.3 Access to Training & Assessment Form

Each completed form will be forwarded to the AO.

8.4 Special Considerations Form

Each completed form will be forwarded to the AO.

8.5 Awarding Organisation Assessment by Providers and Centres Feedback Form

Each completed form, if required, will be forwarded by FIRSTAD4LIFE LIMITED to the AO.

9. Disability Discrimination Act

The Equality Act (2010) protects disabled people. The Act sets out the circumstances in which a person is 'disabled'. It says you are disabled if you have:

- A mental or physical impairment
- This has an adverse effect on your ability to carry out normal day to day activities
- The adverse effect is substantial
- The adverse effect is long term (meaning it has lasted for 12 months, or is likely to last for more than 12 months or for the rest of your life)

There are some provisions, for example:

- If your impairment has substantially affected your ability to carry out normal day-to-day activities but does not anymore, it will still be counted as having that effect if it is likely to do so again.
- If you have a progressive condition, and it will substantially affect your ability to carry out normal day-to-day activities in the future, you will be regarded as having an impairment that has a substantial adverse effect from the moment the condition has some effect on your ability to carry out normal day-to-day activities.
- If you have been diagnosed as having cancer, HIV infection or multiple sclerosis you will automatically be considered as 'disabled'.
- If you are registered blind or partially sighted or certified as blind or partially sighted by a consultant ophthalmologist, you will automatically be considered as 'disabled'.
- People who have had a disability in the past but are no longer disabled are covered by certain parts of the Equality Act (2010).

What are ‘normal day-to-day activities’?

At least one of the following areas must be substantially affected:

- Mobility
- Manual dexterity
- Physical co-ordination
- Continence
- Ability to lift, carry or move everyday objects
- Speech, hearing or eyesight
- Memory or ability to concentrate, learn or understand
- Understanding of the risk of physical danger

It is important to think about the effect of impairment without treatment.

The Act states that any treatment or correction should not be taken into account, including medical treatment or the use of a prosthesis or other aid (for example, a hearing aid). The only things that are taken into account are glasses or contact lenses.

It is important for the candidate to work out how their impairment affects them. They should focus on what they cannot do, or find difficult, rather than what they can do.

For example, if, as a result of hearing impairment, you experience difficulty hearing someone talking at a sound level that is normal for everyday conversations in a moderately noisy place, it would be reasonable to regard this as having a substantial adverse effect. Being unable to hold a conversation in a very noisy place such as a factory floor would not.

If your impairment affects your mobility, being unable to travel a short journey as a passenger in a vehicle would reasonably be regarded as having a substantial adverse effect as would only being able to walk slowly or with unsteady jerky movements. But experiencing some minor discomfort as a result of walking without help for about a mile would not.

Taken from Disability Rights Commission website (<http://www.drc-gb.org/>) frequently asked questions.