



Equal Opportunities and Diversity Policy

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Quality Leisure Management Ltd is a wholly owned subsidiary of PHSC Plc

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Purpose and scope

Quality Leisure Management Ltd (QLM) is committed to providing fair, inclusive and accessible training. QLM will promote equality of opportunity, value diversity and take reasonable steps to prevent discrimination, harassment and victimisation in the design, administration, delivery and assessment of its courses.

This policy applies to prospective learners, enrolled learners, course-booking clients, tutors, assessors, invigilators, employees, associate consultants, subcontractors and other persons involved in courses delivered by or on behalf of QLM. It applies to classroom, practical, workplace, blended and online learning, together with related administration, assessment, learner support and certification activities.

Legal and policy framework

QLM will comply with applicable equality law, including the Equality Act 2010. The protected characteristics under the Act are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

This policy should be read alongside QLM's Reasonable Adjustment and Special Considerations Policy, Equal Opportunities and Diversity Policy, Examination and Appeals Policy, Malpractice and Maladministration Policy and Safeguarding Policy. Requirements imposed by an awarding, licensing or endorsing organisation will also be followed where they apply to a course or assessment.

Definitions

Direct discrimination occurs where a person is treated less favourably because of a protected characteristic.

Indirect discrimination may occur where a provision, criterion or practice applies to everyone but places people who share a protected characteristic at a particular disadvantage and cannot be objectively justified.

Discrimination arising from disability may occur where a person is treated unfavourably because of something arising in consequence of disability and the treatment cannot be objectively justified.

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Victimisation is subjecting a person to a detriment because the person has raised, supported or participated in a genuine equality complaint or has done another protected act under equality law.

A reasonable adjustment is a reasonable change made to remove or reduce a substantial disadvantage experienced by a disabled person when accessing training or assessment.

Diversity means recognising and valuing differences between people. Inclusion means creating conditions in which people can participate, contribute and be treated with dignity and respect.

QLM's commitments

QLM will:

- provide access to training and related services fairly and without unlawful discrimination;

- use entry, participation and assessment requirements that are relevant to the course and applied consistently;
- provide clear information about course requirements, learning activities and assessment arrangements;
- consider accessibility during course design, venue selection, online delivery and the preparation of learning materials;
- consider requests for reasonable adjustments individually and without unnecessary delay;
- maintain professional learning environments in which bullying, harassment, discriminatory conduct and exclusion are not accepted;
- ensure that concerns are handled fairly and that no person is victimised for raising a genuine concern;
- work with awarding, licensing and endorsing organisations where their approval or involvement is required; and
- use feedback, complaints and monitoring information to improve training delivery.

Inclusive course design and delivery

QLM will seek to make course information, booking arrangements, joining instructions, venues, online platforms, learning materials, teaching methods, practical activities and assessment administration accessible and inclusive. Course content and examples will be selected and presented in a professional manner that respects learners and avoids unnecessary stereotyping or exclusion.

Tutors and assessors will use inclusive language, establish appropriate standards of conduct, encourage proportionate participation and respond promptly to inappropriate behaviour. Teaching and assessment decisions will be based on relevant course requirements, learner achievement and applicable awarding or endorsing rules.

Where an essential competence, safety requirement or assessment standard limits the adjustments that can be made, QLM will explain the position and consider any lawful and appropriate alternative available within the relevant course requirements.

Access and reasonable adjustments

QLM will provide learners with an opportunity to identify disability-related or other accessibility requirements. Learners are encouraged to make requests as early as possible so that arrangements can be considered before the course or assessment.

Each request will be considered individually, taking account of the identified disadvantage, the effectiveness and practicality of the proposed adjustment, health and safety, essential competence requirements and any applicable awarding, licensing or endorsing organisation rules. QLM will not use an adjustment to reduce or invalidate the knowledge, skills or competence that an assessment is intended to measure.

Approved arrangements will be communicated to those who need the information to implement them. Further details, including evidence and assessment arrangements, are set out in QLM's Reasonable Adjustment and Special Considerations Policy.

Learner conduct and dignity

Learners are expected to treat other learners, tutors, assessors, QLM personnel and venue staff with dignity and respect. Discriminatory, harassing, threatening or abusive conduct may result in action

under the relevant learner, course, complaints, safeguarding or malpractice procedure. Any response will be proportionate and will take account of the circumstances and available evidence.

Reporting concerns

A learner or other person may raise an immediate concern with the tutor, course administrator or a Director. A person is not required to approach the individual concerned where this would be inappropriate or where the concern is serious.

Formal concerns about discrimination, harassment, victimisation, accessibility or exclusion will normally be handled under QLM's Equal Opportunities and Diversity Policy. Appeals against assessment decisions will be handled under the Examination and Appeals Policy. Safeguarding concerns will be handled under the Safeguarding Policy, and suspected assessment irregularity will be handled under the Malpractice and Maladministration Policy.

Employees may also use QLM's grievance or whistleblowing arrangements where appropriate. QLM will direct a concern to the most suitable procedure and will not delay urgent safeguarding or safety action while deciding which procedure applies.

Investigation and corrective action

Equality-related concerns will be considered promptly, fairly and by a person who is not the subject of the concern and does not have a material conflict of interest. Relevant persons will be given an appropriate opportunity to provide information or respond.

Where a concern is upheld or a review identifies a gap, QLM may take proportionate corrective or preventive action. This may include changes to course administration, learning materials, venue or platform arrangements, tutor support or standardisation, reasonable adjustments, additional learner support, communication with affected learners, or referral to an awarding, licensing or endorsing organisation.

QLM will record the issue, evidence considered, identified cause, action, responsible person, completion date and verification of effectiveness where a formal corrective action is required.

Confidentiality and data protection

QLM will handle equality, disability and health information sensitively. Information will be shared only with those who need it to arrange support, investigate a concern, make a decision, meet a legal obligation or comply with an applicable awarding, licensing or endorsing requirement.

Records will be stored securely, access will be restricted to authorised persons and personal information will be handled in accordance with QLM's data protection arrangements and applicable retention requirements. Information used for monitoring will be limited to what is necessary and, where practical, anonymised or aggregated.

Protection from victimisation

No learner, employee or other person will be disadvantaged for raising a genuine equality concern, supporting another person's complaint, requesting a reasonable adjustment or participating in an investigation in good faith. Knowingly false, abusive or malicious conduct may be addressed separately, but a concern will not be treated as malicious merely because it is not upheld or cannot be substantiated.

Monitoring and organisational learning

QLM will review relevant learner feedback, accessibility requests, equality-related complaints, incidents, corrective actions, course evaluation information and tutor observations to identify recurring issues, emerging risks and opportunities to improve training delivery.

Themes and significant actions will be considered through QLM's management review arrangements. Monitoring will be proportionate and will not be used to make assumptions about an individual learner's ability, needs or likely achievement.

Responsibilities

The Managing Director has overall responsibility for this policy and for ensuring that appropriate resources and arrangements are available. Directors are responsible for implementation, oversight, review and ensuring that significant concerns are addressed.

Tutors, assessors and invigilators are responsible for inclusive delivery, professional conduct, implementing agreed adjustments, applying relevant standards consistently and reporting concerns promptly. Course administrators are responsible for accessible communications, accurate recording of approved arrangements and secure handling of relevant learner information.

Employees, associate consultants and subcontractors working for or on behalf of QLM must comply with this policy and cooperate with related investigations or corrective actions. Learners are expected to treat others with dignity, follow course conduct requirements and raise concerns promptly where possible.

Policy review

This policy will be reviewed biannually and sooner where required by changes to QLM's courses, awarding or endorsing organisation requirements, legislation, identified risks or learning from feedback, complaints and corrective actions.

Signed:



Date: September 2026

Leigh Simmonds

Quality Leisure Management Ltd