

Diversity and Equality Policy (OTHM P009)

1. Introduction

- This document sets out the Diversity and Equality Policy for the Organisation for Tourism and Hospitality Management (OTHM).
- OTHM is committed to the continuous development and review of policies and practices designed to ensure equality of opportunity and treatment of those who are or who seek to be its students or its employees.
- In meeting this commitment OTHM will take due account of any duties or obligations imposed by the law, and will not discriminate on grounds of age, colour, disability, marital status, race, religion, sex, sexual orientation or other unjustifiable cause. This includes ensuring that no unnecessary barriers are present which deny access to students who could otherwise enter for examinations and achieve credit and/or qualifications.

2. Scope:

- This policy will be applied to all areas within OTHM's regulated and unregulated functions to include:
 - ❖ Units and Rules of Combination (RoC);
 - ❖ Qualifications and Assessments approved under the QCF regulatory requirements;
 - ❖ Responsibilities of the OTHM Board of Directors and the associated Committees of the Board of Directors.

3. Audience

- The policy applies to:
 - ❖ All OTHM staff, students and designated OTHM delivery centres project workers, consultants and / or all visitors or contractors who visit OTHM;
 - ❖ Committees of the OTHM Board of Directors responsible for QCF regulatory functions (Unit developers, writers, reviewers, individuals involved in OTHM examinations);
 - ❖ Qualification Regulators.

4. Definitions

- **Equal opportunities** refers to the elimination of unlawful and unfair direct and indirect discrimination of particular groups and promoting equal access, treatment and outcomes that take into account specific needs of individuals.
- **Diversity** - Diversity encompasses visible and non-visible individual differences that includes, but is not limited to, differences protected by anti-discrimination legislation. Appreciating diversity is about valuing differences and recognising that everyone through their unique mixture of skills and experience has their own valuable contribution to make

5. Statement of Policy and Commitment

- OTHM is committed to the principles of fairness and equality of opportunity and to providing an environment where students, staff and other clients can achieve their full potential regardless of any potentially discriminating factor.
- OTHM is committed to both the elimination of unlawful discrimination and the positive promotion and celebration of equality and diversity.
- OTHM will ensure that:
 - ❖ Students have the opportunity to a broad, relevant and balanced range of high quality assessments and awards of qualifications thus maximising the opportunities for students to access, participate and achieve successful outcomes;
 - ❖ The widest possible diversity of learners can access the content and assessment of our qualifications and services;
 - ❖ The language we use in our materials is clear, free from bias and appropriate to the target group;
 - ❖ Examinations and Assessments are conducted in line with the equality and diversity policy and the Regulatory Arrangements for the Qualifications & Credit Framework (QCF) 2008);
 - ❖ There is a mechanism in place which will enable anyone who believes they have been discriminated against to raise the matter through the appropriate channels and to have access an appeal;
 - ❖ The entry requirements, content and assessment demands of our qualifications and services are appropriate to the knowledge, understanding and skills specified and do not act as unnecessary barriers to achievement;

- ❖ No unnecessary barriers are present which deny access to students who could otherwise enter for examinations and achieve credit and or qualification;
- ❖ Where there are unavoidable barriers to access, OTHM will make these clear to students and delivery centres and manage their expectations appropriately;
- The following potential barriers to examination entry are identified:
 - ❖ Financial barriers: Entry to the OTHM examination may be denied to students whose economic status prevents them from being able to pay the required OTHM stated fee;
 - ❖ Disability barriers: specifically, students who feel unable to enter for an examination due to the presence of a barrier, such as a permanent or temporary disability or condition all of which may prevent candidates from achieving learning outcomes in units or qualifications based on the requirements of the units and qualifications;
 - ❖ Religious barriers: Candidates may, for religious reasons, be unable to take part in an examination on a certain day;
 - ❖ Age barriers: students may be younger than the OTHM stated minimum age for entry to examination;

OTHM will mitigate against the above potential barriers in the following ways:

- ❖ Financial barriers: OTHM Examination fees are set at a level which is considered to be the minimum possible, given the need to provide a professional service and to ensure the long-term financial security of the organisation;
- ❖ Disability barriers: Students with a disability are encouraged to disclose this to OTHM, to enable any necessary reasonable adjustments to be planned. Consideration of applications from students who declare a disability is based on the same criteria and principles as for other candidates;
- ❖ Religious barriers: The OTHM examinations dates are planned to avoid religious holidays. These dates are well publicised on the OTHM websites in advance of the examination cycle in June and December;
- ❖ Age barriers: Minimum age requirements are included in entry specifications to the OTHM qualification which is appropriate for use for the stated age group and to meet the legal requirements around activities undertaken by students of specific ages.

6. Legal responsibilities

- The Organisation for Tourism and Hospitality Management (OTHM) recognises and accepts its responsibilities under the law and commit to complying with the requirements of equalities in force from time to time, which at the time of review and writing of this document includes, but is not limited to, the Equality Act 2010.
- OTHM is committed to ensuring equality for all irrespective of:
 - ❖ age (except for the current contractual retirement age for employees, and restrictions on services set by funding bodies);
 - ❖ disability;
 - ❖ gender reassignment;
 - ❖ marriage and civil partnership;
 - ❖ pregnancy and maternity;
 - ❖ race (including colour, nationality and ethnic or national origins);
 - ❖ religion or belief;
 - ❖ sex, or sexual orientation;

Under the Equality Act (2010) these are known as “protected characteristics”.

7. Staff Roles and responsibilities

- All OTHM Staff, Examiners, Moderators, Invigilators, Unit writers and Reviewers, and associates and delivery centre staff, and students have a responsibility to comply with the intentions of this policy.
- OTHM has a responsibility to:
 - ❖ Ensure that equality and diversity is embedded in the qualification development process, including the development of units and rules of combination;
 - ❖ Consult with relevant students and/or their representatives to ensure that there are no barriers to entry to the units and qualifications developed and/or offered for disabled people, for women or men, or people from different racial groups, other than those directly related to the integrity of units or qualifications;
 - ❖ Record details on how any potential barriers will be mitigated by using access arrangements and reasonable adjustments. Should any barriers be identified they are recorded in the associated unit /qualification development and review materials together with any justifications of the

requirements and details of how the barriers will be mitigated. For example, using access arrangements, including reasonable adjustments. These will be reviewed for appropriateness before the final content is signed off and the unit/ qualification accredited;

- ❖ Oversee the fair and consistent application of this policy and procedure
- ❖ Monitor and evaluate the effectiveness of this policy and determine the nature of any corrective action ;
- Collect sufficient data to allow for monitoring and compliance with regulatory criteria;
- Share information relating to monitoring and evaluation activities with the qualifications regulators on request.
- Staff with Responsibility for Diversity and Equality:
 - ❖ The Quality Assurance Committee through the Quality Assurance Manager has ultimate responsibility for ensuring that OTHM Diversity and Equality Policy is fully implemented. The Director of Education, who is a member of the Board of Directors and Chair of the Quality Assurance Committee, has a specific and delegated responsibility for the effective development and implementation of diversity and equalities at OTHM;
 - ❖ The Quality Assurance Manager, who reports to the Director of Education (Chair of the Quality Assurance Committee), is responsible for the co-ordination of the diversity and equality work;
 - ❖ The Curriculum and Qualifications Manager has responsibility for the implementation of this policy in relation to QCF exam writers, unit writers, RoC writers, to support OTHM's overall QCF regulatory requirements;
 - ❖ The Chief examiner has responsibility for the implementation of the Diversity and Equality policies and procedures in relation to examiners to support the OTHM's overall strategy in assessments.

8. Implementation of Diversity and Equality Policy:

- OTHM will ensure that all staff, students and others associated with OTHM are informed of the policies and their responsibilities with respect to implementation. The means of doing so include:
 - ❖ Nomination of individuals who will be responsible for promotion of diversity and equality and for arranging an annual briefing for all staff;
 - ❖ The production and distribution of information for all OTHM staff to raise awareness of specific equality legislation issues;

- ❖ Diversity and Equity awareness raising and training will be mandatory for all staff. In addition, staff involved in the development of QCF provision will receive training on how to identify diversity and equality issues as part of the development process and how to record and address these using the relevant templates and checklists;
- ❖ Information will be provided to all students in order to raise awareness of equality and diversity and the contents of this policy;
- ❖ The training programme will be monitored to evaluate its effectiveness.

9. Qualification and Assessment Development

OTHM will ensure that:

- ❖ all relevant and related development of assessment materials based on the QCF units includes a requirement that a check is carried out to ensure that, in their design, the assessment materials take account of all relevant diversity legislation and do not create any unnecessary barriers to assessment for any candidate;
- ❖ In the development of our qualifications and products, there are no barriers to achievement in the assessment requirements in terms of gender, race, age, sexual orientation and religion/belief;
- ❖ The development of qualifications and all associated tasks of assessment, awarding and appeal will take into consideration the needs of all potential learners to ensure that there are no barriers in terms of disability, gender, race, age, sexual orientation and religion/belief;
- ❖ Any barriers particularly for students with disabilities are removed from the assessment process and made where required;
- ❖ Staff and associates are trained in ensuring equality in the design, development and subject matter of qualifications, assessment and awarding procedures, language used in assessment and systems used to ensure consistency of standards across options, centres and time;
- ❖ The Diversity and Equity is embedded in the qualification development process, including the development of units and Rules of Combination (Roc).
- ❖ Students and/or their representatives are consulted to ensure that there are no barriers to entry to the units and qualifications developed and/or offered for disabled people, for women or men, or people from different racial groups, other than those directly related to the integrity of units or qualifications;
- ❖ details are recorded on how any potential barriers will be mitigated, by using access arrangements and reasonable adjustments;

- ❖ Monitor and evaluate the effectiveness of this policy and determine the nature of any corrective action;
- ❖ Collect sufficient data to allow for monitoring and compliance with regulatory criteria;
- ❖ Share information relating to monitoring and evaluation activities with the qualifications regulators on request.

10. Monitoring and Review

- The Organisation for Tourism and Hospitality Management (OTHM) will review policy annually and revised in response to staff, students and stakeholder feedback, actions from regulatory authorities or change in legislation.

The OTHM monitoring and review arrangements include:

- ❖ The collection of information on age, gender, ethnic origin and disability from students so that data can be used for monitoring purposes. This information is confidential and is used anonymously to compile statistical reports;
 - ❖ The collection and analysis of data in relation to requests for special consideration, access arrangements, the diversity of student groups;
 - ❖ Review all of qualifications and assessment design tools and ensuring that individuals involved in, and consulted during the development of units and qualification, rules of combination are aware of their responsibility to evaluate all drafts for diversity and equality issues and report these;
 - ❖ The OTHM Examinations Board undertakes the statistical monitoring of students examinations, reasonable adjustments made, customer service, complaints and appeals.
- All relevant issues identified that suggests that OTHM provision or services may have unnecessarily impacted on students will be reported back to the OTHM Development and Review Sub – Committee, the Quality Assurance Committee and the Examinations Board who will be responsible for ensuring that relevant staff introduce, as appropriate, amendments to provision and/or services where necessary and in accordance with our documented procedures for developing and reviewing units and qualifications. (OTHM Policy docs OTHM P015, OTHM Po16, OTHM P017 and OTHM M029)
 - Details of the outcomes of each review will be made available to the OTHM Board of Directors and the qualification regulators upon request

11. Compliance

- The following steps will be taken to ensure compliance with the relevant diversity and equity legislation requirements:
 - ❖ The document procedures for the development and ongoing review of units; Qualification development and review - rules of combination (RoC) and Assessment development and review (Unit and qualifications development review process, Please refer to OTHM Policy docs “OTHM OTHM P015 - Unit Development & Review Procedure”; “OTHM P016 - Qualification Development & Review Procedure” and “OTHM P017 - Assessment Development & Review Procedure”);
 - ❖ OTHM ensures that the design of assessment materials includes checks carried out when developing assessment materials based on QCF units is carried out to ensure that, in their design, the assessment methods take account of all relevant diversity and equity legislation and do not create any unnecessary barriers to assessment for any student;
 - ❖ The annual compliance review will be made available to the regulatory authorities at their request.

12. Quality assurance

- OTHM procedures will collect sufficient data to allow the OTHM Quality Assurance and Audit Committee to monitor and evaluate that there is no discrimination on the grounds of race, disability and gender (student registration and achievement evaluation, policy review, yearly report of statistical analysis) to the OTHM Board of Directors.
- OTHM procedures will collect sufficient data to allow the quality assurance manager to monitor and evaluate that there is no discrimination on the grounds of race, disability and gender (student registration and achievement evaluation, policy review, yearly report of statistical analysis and sent to the Quality Assurance and Audit Committee.

13. Confidentiality

Any information disclosed to OTHM in relation to diversity and equality issues will be kept strictly confidential in accordance with legislative requirements.

14. OTHM Contact details for this policy

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