

Equality, Diversity and Inclusion

BSAC Equality, Diversity and Inclusion Policy and Procedures



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Foreword

The British Sub Aqua Club (BSAC) is committed to creating and maintaining a physically and psychologically safe and positive environment for all members involved in diving and snorkelling in accordance with UK legislation.

The BSAC Equality, Diversity and Inclusion Policy and Procedures apply to all individuals involved in BSAC. This policy and procedures document outlines what is expected of our members and what to do if you have a concern.

BSAC acknowledges that it is required to fulfil a duty of care, which includes that we ensure those in our community are treated equally, with respect, and are physically and psychologically safe. We want all who are involved to find it fun and enjoyable, and we aim to ensure that this always happens (see other BSAC policies covering safeguarding etc.). We all have the responsibility to protect each other from any harm.

This policy sets out how we as an organisation seek to protect the rights of all our members. It is the duty of every member to make themselves aware of this policy and that all diving and snorkelling branches must follow this policy and its guidance. If you have any doubts or queries in regards to the application of this policy, you should contact the BSAC Welfare Officer (WO) at BSAC HQ.

Introduction

This policy and procedures document, titled **Equality, Diversity and Inclusion**, outlines what is expected of our members and what to do if you have a concern.

This Equality, Diversity and Inclusion policy and procedures document has been written in line with the Equality Act 2010 and outlines some language recommendations and guidance.

In this document, 'Club' will be used to refer to BSAC as a whole, and 'Branch' will refer to any individual Branch of BSAC or a BSAC Centre.

Equality, Diversity and Inclusion highlights that no one person in our Club is solely responsible for the physical and psychological safety and respect of our members. That responsibility lies with all our members at all levels.

The Equality, Diversity and Inclusion Policy and Procedures document has been written to provide information for all our Branch Officers, instructors, volunteers, members, carers and others. The Welfare Officer (WO) within a Branch will be the initial contact to which a concern should be raised and discussed. The WO will have the support of the BSAC WO as well as relevant outside agencies. The WO will encourage and assist the Branch in implementing the policies and procedures within **Equality, Diversity and Inclusion**.

BSAC will encourage and support partner organisations, including other clubs, suppliers, and sponsors to adopt and demonstrate their commitment to the principles and practices as set out within the Equality, Diversity and Inclusion policy and procedures document.

Branches should adopt and implement the Equality, Diversity and Inclusion Policy and Procedures.

This policy will be reviewed annually by the BSAC WO or the Honorary Secretary.

The key commitments of this policy are:

- To create an environment in which individual differences and the contributions of all members are recognised and valued.
- To respect all members.
- To encourage anyone who feels they have been subject to discrimination to raise their concerns so corrective measures can be applied.

- To ensure all members feel physically and psychologically safe and are treated fairly and with respect when taking part in BSAC activities.
- To raise awareness amongst all members, staff and others so that they know what to do when raising a concern over behaviour.
- To protect Branch Officers, instructors, volunteers, members, carers and others by giving them practical, common sense guidelines to avoid placing themselves in situations where they are open to allegations which could seriously damage their lives and careers.
- To protect Branches by showing that you have taken all reasonable steps to provide a safe environment.

Branches are therefore strongly advised to take the following steps:

- **Adopt a policy statement** that defines the organisation's commitment to providing a safe environment.
- **Produce a simple code of practice and procedures** governing how the Branch runs. This should cover:
 - Good practice guidelines to ensure the equal treatment, safety and respect of all members at all times.
 - Handling concerns, reports or allegations.

Everyone in each Branch should be aware of the policy and have access to the supporting procedures.

This document will be reviewed and updated as required and any relevant changes in legislation, policy or procedure will be incorporated as and when required.

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Section 1

1.1 Policy statement and commitment by BSAC

1.2 Key definitions

1.3 Acknowledgements

1.1 Policy statement and commitment by BSAC and Branches

It is the belief of BSAC that all members of our Club have a right to be respected, treated fairly, have fun and to learn and develop the skills of our sport. To achieve this, BSAC is committed to the wellbeing of everyone who participates in sub-aqua and snorkelling activities.

BSAC is committed to supporting the wellbeing of members through the development of policies, procedures and guidance, making relevant training available to volunteers and paid employees whose role requires it, and by developing a positive culture in all our Branches.

A guidance framework is set up for Branches to follow to achieve the required standard of care, respect and equality that everyone has a right to expect.

BSAC is committed to working in partnership with the Police and other agencies to enable them to carry out their statutory duties to investigate concerns and protect all members from harm. In order to achieve this, BSAC will develop and adhere to such policies and procedures as are required to meet this commitment, as well as developing and maintaining professional links with other organisations.

1.2 Key definitions

To assist in working through and understanding this policy a number of key definitions need to be explained:

Abuse

Abuse is a violation of an individual's human and civil rights by another person or persons, including but not limited to violation of the Equality Act 2010.

Branch

Refers to a branch of BSAC or a BSAC Centre.

BSAC Welfare Officer (BSAC WO)

The BSAC WO is an officer appointed by BSAC who has overall authority for all equality, diversity and inclusion matters.

Equality

The state of being equal, especially in status, rights or opportunities, and often linked to the legislative framework in the UK, the Equality Act 2010.

Discrimination

The practice of unfairly treating a person or group differently from other people or groups of people.

Diversity

The practice or quality of including or involving people from a range of different social and ethnic backgrounds and of different genders, sexual orientations, etc.

Inclusion

The practice or policy of providing equal access to opportunities and resources for people who might otherwise be excluded or marginalised, such as those who have physical or mental disabilities and members of other minority groups. Inclusion will ensure that everyone feels valued, comfortable, and confident to be themselves and participate in a way that suits them.

Welfare Officer (WO)

The Welfare Officer (WO) will be the person who leads EDI within a Branch and will be the initial contact to which a concern should be raised and discussed.

1.3 Acknowledgements

BSAC has drawn on the work of other organisations in the development of this policy and procedures document and would like to both acknowledge and thank them for their kind permission to use and adapt their material:

- Sport England
- Swim England

Section 2

2.1 Introduction

2.2 BSAC values

2.3 BSAC's commitment to its members

2.4 Duty of care to all members

2.5 Equality, diversity and inclusion principles

2.6 Making equality, diversity and inclusion personal

2.7 Wellbeing principle

2.8 Legislation

2.9 Role description of the Welfare Officer in relation to EDI

2.10 Confidentiality and information sharing

2.1 Introduction

Section 2 is written to assist Branch Officers, instructors, volunteers, members, carers and others to meet their duty of care to everyone in their Branch. Branch Officers have the responsibility to develop and maintain good policies and procedures. The Welfare Officer (WO) is the lead designated person in the Branch who will help guide and assist the Branch in developing equality, diversity and inclusion policies but is not solely responsible for this within the Branch. That responsibility lies with all the members; be they Branch Officers, instructors, volunteers, members, carers or others.

BSAC requires all Branches to adopt the following section on the duty of care which supersedes all previous policies. All those who interact directly with members in the Branch should ensure they are acquainted with the policies, procedures and guidance so they can identify concerns and are aware of what actions to take.

The Branch should make the policy known to all involved in the Branch and make them aware they can access the EDI Policy and Procedures on the BSAC website.

2.2 BSAC values

- BSAC has a clear commitment to equality and diversity and this is embedded in everything it does.
- We are passionate about making the sports of scuba diving and snorkelling inclusive, open and accessible to everyone.
- We seek to create a culture and environment where everyone has the opportunity to participate, volunteer, teach and run diving and snorkelling branches.
- We seek to overcome potential barriers for those individuals and groups currently under-represented as participants.
- We celebrate that, as a sport, we are unique in that we are non-competitive and all genders can participate equally. We are open to a broad age group, from 8+ for snorkelling and 10+ for diving. We offer a sport accessible to people living with disabilities.

2.3 BSAC's commitment to its members

As an employer, a sports club and national governing body, BSAC is committed to eliminating discrimination and valuing diversity in all of our activities. We also recognise we have a responsibility in the wider sporting community to encourage good health and active lifestyles in all sections of the population.

We monitor and address outcomes and ensure that the overarching values of fairness and equality are integrated throughout our work.

BSAC will ensure that our employees and members are treated equally, with dignity and respect, regardless of the nine characteristics protected by the Equality Act 2010.

These are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including ethnic origin, colour, nationality, and national origin)
- religion and belief (including philosophical belief)

- sex/gender
- sexual orientation

We will oppose and challenge all forms of unlawful and unfair discrimination, harassment or victimisation.

2.4 Duty of care to all members

All members of BSAC have a duty of care to anyone they interact with. BSAC policies are aimed at ensuring specific aspects of interaction are conducted in an appropriate manner and are covered within:

- BSAC Governing Documents
- Branch Bye Laws / Constitutions
- BSAC Policy Documents
- Diving Guidance
- Diver Training
- The BSAC Website

All those who interact directly with members in the Club have a duty of care to ensure the equal treatment and respect of all members of BSAC. The WO does not have sole responsibility for this in a BSAC Branch. That responsibility lies with all members associated with the Branch.

The WO does have specific responsibilities in respect of ensuring that concerns raised are dealt with appropriately. Equality and respect of members is to be put at the heart of all Branch activities. The WO takes the lead in the Branch in ensuring these practices are put into place and is the person to whom others can go for advice and guidance on equality, diversity and inclusion issues. The WO can in turn seek advice and support from the BSAC WO and statutory agencies.

Branches should embed equality, diversity and inclusion into their standard practices to minimise and prevent discrimination from Branch members and associated issues arising. To demonstrate a Branch is meeting a duty of care, they must have in place policies and procedures to prevent, identify and action incidents of poor practice in the Branch. This document contains clear guidelines, policies and procedures to assist Branches in meeting that duty of care.

Action a Branch must take to meet its duty of care:

- The explicit adoption of the equality, diversity and inclusion policy in full:
 - Promoting a safe environment as paramount.
 - Identifying failures in their Branch and take action to address those failures.
 - Promoting equality, diversity and inclusion to all officers, instructors, members, carers and others in the Branch.
 - Adopting BSAC's whistleblowing policy.
 - Having a WO in post who understands EDI and has completed the BSAC EDI language awareness module.
 - Providing a non-discriminatory environment.

2.5 Equality, diversity and inclusion principles

The guidance given in this policy and procedures is based on the following principles:

- All members have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment. In accordance with the Equality Act 2010, there are nine protected characteristics.
- Under the same Act all members have the right to be protected from discrimination.
- The rights, dignity and worth of all members shall always be respected.
- BSAC recognises that ability and disability can change over time, such that some members may be additionally prone to abuse, for example those who have a dependency on others or have different communication needs.
- BSAC recognises that a person living with a disability may or may not identify themselves.
- We all have a shared responsibility to ensure the respect and wellbeing of all our members and will act appropriately and report concerns whether these concerns arise within BSAC; for example, inappropriate behaviour of an instructor, or in the wider community.
- All allegations will be taken seriously and responded to quickly in line with this policy and procedures.

2.6 Making equality, diversity and inclusion personal

'Making equality, diversity and inclusion personal' means creating an environment in which members feel safe and supported enough to raise concerns about the way they are being treated or spoken to should such a situation occur.

It allows for the engagement of the person in a conversation about how best to respond to their situation in a way that enhances involvement, choice and control. As well as improving quality of life, wellbeing and safety. Wherever possible, discuss concerns with the member to get their view of what they would like to happen and keep them involved in the process, seeking their consent to share information outside of the Branch where necessary.

2.7 Wellbeing principle

The concept of wellbeing is threaded throughout everything we do in sport and activity. Wellbeing is different for each of us. By keeping these themes in mind, we can all ensure that all members can take part in diving and snorkelling fully.

- Personal dignity (including treatment of the individual with respect).
- Physical and mental health and emotional wellbeing.
- Protection from abuse and neglect.
- Participation in work, education, training or recreation.
- Accommodation considerations during dive trips.
- The individual's contribution to society and community.

2.8 Legislation

The practices and procedures within this policy are based on the principles contained within UK legislation and Government Guidance and have been developed to complement the Equality Act 2010.

2.9 Role description of the Welfare Officer (WO) in relation to EDI

Everyone in BSAC has a responsibility to equality, diversity and inclusion. The role of a WO in relation to EDI is primarily to promote good practice within your Branch, to be a named point of contact for your members and to understand the



BSAC reporting procedures in case a concern is raised.

The information below outlines the role, and skills and knowledge to look for in a WO in relation to equality, diversity and inclusion.

Role

- Be the first point of contact for Branch Officers, instructors, volunteers, members, carers and others where concerns about equality, diversity and inclusion are identified.
- Implement the Branch or Club's reporting and recording procedures.
- Promote the Branch's best practice guidance/code of ethics and behaviour within the Branch.
- Assist the Branch to fulfil its responsibilities to equality, diversity and inclusion.
- Assist volunteers in keeping their safeguarding certificates and qualifications up to date.
- Advise and attend Branch's management committee as required.
- Ensure confidentiality is maintained.
- Promote anti-discriminatory practice.
- Be the first point of contact with the BSAC WO.

Experience and knowledge

- Hold an enhanced DBS check before commencement of the WO role.
- Be knowledgeable of and work to the BSAC policies and procedures.
- Have a working knowledge of the BSAC and Branch's role and responsibilities to members.
- Have basic knowledge of roles and responsibilities of local statutory agencies.
- Know and work to the boundaries of the WO role.
- Have an awareness of equality issues.
- Have an awareness of core legislation, government guidance and national framework with respect to the Equality Act 2010.

Skills

- Approachable

- Basic administration
- Basic advice and support provision
- Communication
- Maintaining records
- Ability to promote organisation's policy, procedures and resources
- Interpersonal

2.10 Confidentiality and information sharing

The government guidance document on "Information Sharing Advice for Safeguarding Practitioners" outlines seven golden rules:

1. Remember that the General Data Protection Regulation (GDPR) and Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family or carer where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead (this would be the WO or BSAC WO), if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and wellbeing: base your information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Section 3

3.1 Introduction

3.2 Policy into practice

3.3 Discrimination

3.4 What to do if you have a concern or someone raises a concern with you

3.5 How to respond to concerns

3.6 Handling the media

3.1 Introduction

This section provides practical advice as to what action to take should concerns regarding equality, diversity and inclusion be raised. The steps are as clear and concise as possible to cover every eventuality and all persons dealing with concerns are to follow these steps.

3.2 Policy into practice

As an employer, we will:

- Treat all employees and volunteers fairly and with respect, whether part-time, full-time or temporary.
- Ensure that all our HR policies are fair, inclusive and accessible.
- Provide managers with the necessary training to implement our policies.
- Select for employment and promotion on the basis of ability and aptitude.
- Encourage all employees to develop to their full potential.
- Create a supportive environment where individual differences and contributions of all staff are recognised and valued.
- Be flexible in the way that we work.
- Address any breaches of this equality policy as misconduct.

As a training provider, we will:

- Design services that are accessible and tailored to meet the needs



of everyone.

- Offer instructors training for teaching people living with disabilities through our Diving for All courses.
- Make reasonable adjustments to courses to encourage participation by people with disabilities.
- Ensure our public information is accessible and reflects the diversity of the diving and snorkelling communities.
- Ensure all our partners and suppliers share our values and commitment.

As a Club, we will:

- Educate on fairness and equality through our activities.
- Create safe and supportive environments.
- Inspire and motivate all divers and snorkellers to fully reach their potential.

As a national governing body, we will:

- Encourage the adoption of equality and diversity policies by other agencies engaged in underwater activities.
- Understand that the Equality Act 2010 requires a proactive approach with the challenge of demonstrating it in practice. These policies need the support of all BSAC directors, employees, Branch Officers and members.

All members and employees are encouraged to:

- Be aware of discriminatory practices (described below) and avoid them.
- Ensure that everyone is treated positively and fairly.
- Challenge others if they feel that they are behaving in a discriminatory manner, where it is safe to do so.
- Inform a Branch Officer or a manager at HQ if they think they are being discriminated against or if they think that discriminatory practices are in place.

3.3 Discrimination

When people are not treated equally it is termed 'discrimination'. This might not always be obvious and BSAC members and employees should be aware of the following terms.

- **Direct discrimination** means treating a person less favourably



than others are or would be treated in the same circumstances. For example, men being paid more than women for the same job.

- **Indirect discrimination** means applying a requirement or condition which, whether intentionally or not, has an adverse effect on any person. For example, requiring a university degree for a post that does not need one would discriminate against any group less likely to have had a university education.
- **Associative discrimination** is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic, e.g. gender or sexuality.
- **Perceptive discrimination** is where an individual is directly discriminated against or harassed based on a perception that they have a particular characteristic when in fact they do not. For example, a person might feel they are discriminated against because other people think they are LGBTQ+ when they are not.

3.4 What to do if you have a concern or someone raises a concern with you

- It is not your responsibility to decide whether or not someone has been discriminated against. It is however everyone's responsibility to respond to and report concerns.
- If you are concerned someone is in immediate danger, contact the police on 999 straight away. Where you suspect that a crime is being committed, you must involve the police.
- If you have concerns and/or you are told about possible or alleged abuse, poor practice or wider issues, you should report this to the WO in the first instance. However, if the WO is implicated, then report it directly to the BSAC WO (concern@bsac.com).
- Should the BSAC WO be implicated then report it directly to the BSAC Chair (chair@bsac.com).
- When concerns have been raised with the WO, it is good practice for them to seek the member's view on what they would like to happen next and to inform that member that they will be passing on their concern.
- It is important when considering any concerns raised that the member is kept informed about any decisions and action taken, wherever possible, and that any action always consider their needs and wishes.

3.5 How to respond to concerns

- Make a note of the concerns.
- Initially discuss the concerns separately with the people involved; both the person who was allegedly discriminated against and the person allegedly discriminating.
- Determine the facts as to whether discrimination took place or not.
- Should discrimination have taken place, discuss with the discriminator their language; they may be unaware the use of such language is inappropriate.
- If the discriminator is aware their language is not appropriate but does not see this as an issue, then the situation should be discussed with the Branch Officers, and where possible further remedial training put in place, e.g. taking or retaking the BSAC online training module on equality, diversity and inclusion.
- The discriminator should be left in no doubt of the seriousness of such discrimination, intentional or not, the need to comply with both BSAC EDI policy and procedures and the Equality Act 2010, as well as the possible consequences if it continues.
- Should the discriminator's behaviour continue despite input from the WO and the Branch Officers, then refer to the BSAC WO, contactable via **concern@bsac.com** or 0151 350 6210. This interaction should cover:
 - A description of the circumstances in which the situation came about, taking care to distinguish between fact, observation, allegation and opinion.
 - It is important that the information you provide is accurate.

The BSAC WO will acknowledge the concern before following the disciplinary procedures as described in the BSAC Whistleblowing Policy and BSAC Articles of Association. This can be found at **bsac.com/articles**.

3.6 Handling the media

If there is an incident which attracts media interest and you are contacted by the media, do not give any response until you have had an opportunity to check the facts and seek advice. You should contact BSAC HQ on **+44 (0)151 350 6200** for professional advice on handling the media.