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## Equality, Diversity and Inclusion and Anti-Bullying and Harassment Policy

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<b>Version Control:</b> 2.0
<b>Effective From Date:</b> February 2026
<b>Responsible Officer:</b> Head of Quality & Safeguarding
<b>Approved by:</b> Governors/ CEO/ Senior Leadership Team
<b>Review Due:</b> 16/02/2027

## Summary of Changes

<b>Version</b>	<b>Review date</b>	<b>Comments</b>
2.0	16/02/26	Combined the Equal Opportunities Policy and the Learner Anti-Bullying Policy. This policy includes Diversity and Inclusion, all learners, apprentices, staff and other stakeholders of Runway Training. Updates to legislation. Removed the need to complete a bullying and harassment form, the safeguarding concern and disclosure form will be completed.

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## 1. Purpose

To create an inclusive community with a sense of belonging that challenges and inspires through inspirational teaching, support, and care.

Runway Training values the rich diversity not only of its local community but also of the wider area from which people are recruited to its learning programmes. It is committed to equality, diversity, and inclusion for all who learn, work, or use our services, and aims to provide high-quality services fairly and equitably to the entire community. The contribution of our staff is crucial to achieving this, and Runway Training recognises the importance of having a diverse and representative workforce capable of meeting the needs of all communities.

We are committed to:

- Eliminate discrimination, harassment, and victimisation.
- Promote equal opportunities for individuals with and without a protected characteristic.
- Promote positive relationships between individuals who share a protected characteristic and those who do not.
- Recognising everyone's strengths, talents, and needs, nurturing potential, maximising opportunities, and actively promoting tolerance and respect for all.
- Recognise that everyone has a right to equal opportunities regardless of race, disability, gender, gender reassignment, age, nationality, sexual orientation, religion or belief (or absence of), marital or civil partnership status, pregnancy or maternity status, or socioeconomic status, background or class.
- We will publish information demonstrating our commitment to and compliance with the specific equality duties across our functions, as well as addressing the needs of our communities.

This policy sets out Runway Training's vision, core values, and commitment to equality, diversity, and inclusion, affirming everyone's right to live free from bullying, harassment, victimisation, and discrimination. It reflects our responsibilities under the Equality Act 2010 and subsequent amendments.

## 2. Scope

This policy applies to all members of Runway Training, including staff, learners, apprentices, governors, and visitors. It also covers individuals who use our services or are employed through agencies, contractors, or subcontractors.

- Staff, learners, and apprentices working or studying on premises not owned by Runway Training will still be subject to the policy.
- This policy may also cover behaviour outside working hours and premises. For instance, we are responsible for acting when discriminatory behaviour or harassment by staff members outside working hours is brought to our attention, or when learners' or apprentices' inappropriate behaviours under this policy are noticed outside the learning environment and affect a member of staff, learner or apprentice, either directly or indirectly.
- Breaches of this policy will be taken seriously and may lead to disciplinary action.

## 3. Policy Statement

As part of its overall commitment to equality, diversity and inclusion, Runway Training is fully committed to promoting a positive and harmonious work and learning environment where every colleague, learner and apprentice is treated with respect and dignity and in which no one feels threatened or intimidated because of his their age, sex, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief and sexual orientation.

Harassment and bullying in any form are unacceptable behaviours and will not be tolerated or condoned. Harassment may constitute a civil or criminal offence and may breach health and safety legislation.

Bullying and harassment are not only morally wrong, but they can also harm a productive work and learning environment, impacting the health, confidence, morale, and performance of those affected, including anyone who witnesses or is aware of unwanted behaviour.

Runway Training is not directly responsible for bullying or harassment occurring outside the work or learning environment but will take appropriate action if such activities affect the safety of a colleague, learner, or apprentice within that environment.

To raise awareness of the impacts of bullying and harassment and to support and sustain good relationships, all staff, learners, and apprentices will enhance their knowledge and understanding of equality, diversity, inclusion, and British Values. This includes treating individuals honestly and respectfully, being tolerant, and accepting differences as part of their work and learning journey, starting at induction and monitored throughout their time at Runway Training.

Runway Training aims to:

- Ensure equal access, fair treatment, and suitable provision for the entire community, regardless of race, gender, disability, age, religion/belief, nationality, social background, or sexual orientation, and any other reason not linked to entitlement and availability.
- Celebrate equality and diversity with displays, activities, enrichment, and celebratory events.
- Incorporate equality and diversity into curriculum planning, teaching, and learning.
- Ensure marketing, publicity and recruitment procedures are inclusive and present positive images of all sections of the community.
- Identify the needs of disadvantaged groups and work towards removing any real or perceived barriers to participation and success.
- Provide high-quality services tailored to meet a broad range of community needs and regularly review them by gathering feedback from existing and prospective learners and apprentices to ensure that we do not disadvantage learners or apprentices now or in the future.
- Runway Training will address any complaints. Engage with and actively listen to people using our services by regularly seeking feedback through various methods, including meetings with members of different communities.
- Ensure that, where possible, all services and buildings are accessible.

#### 4. Definitions

“Protected Characteristic”. The Equality Act 2010 introduced the term to describe aspects of a person’s identity that are explicitly protected from unlawful discrimination. Nine are identified: - Race; Disability; Gender; Age; Sexual Orientation; Religion and Belief; Gender Reassignment; Pregnancy/Maternity; and Marriage/Civil Partnership. Socio-economic status, class, or background is not a “protected characteristic” under the Equality Act. Nevertheless, we consider it essential to the experiences of groups of people whose life chances may be affected by their social identity, especially those from disadvantaged socio-economic backgrounds.

Public Sector Equality Duty (PSED) “Advance” equality of opportunity involved having due regard to the need to:

- Remove/minimise disadvantages experienced by persons who share a relevant protected characteristic that are connected to that characteristic.
- Take steps to meet the needs of people who share a relevant characteristic that are different from the needs of people who don’t need it.

Encourage people with a relevant protected characteristic to participate in public life or in any other activities where their participation is disproportionately low. “Foster” good relations means taking due regard of addressing prejudice and promoting understanding.

**Equality** is not about treating everyone the same. It focuses on treating people fairly and recognising that some groups and individuals have specific needs that must be met to ensure equal access to employment and education. At Runway Training, we recognise that some people who work and study with us may require reasonable adjustments and additional support to ensure equality of opportunity, especially if they face long-standing disadvantages.

**Diversity** involves recognising that individual and professional differences are a natural part of society and can often present opportunities for those who recognise them. Valuing diversity means acknowledging the benefits and intrinsic worth these differences bring and viewing them as strengths. At Runway Training, we aim to celebrate and value these differences. We seek to promote greater mutual understanding between groups and individuals who reflect these differences, and to maximise the talents and experiences they contribute to Runway Training. We actively encourage discussion and understanding of British Values in our apprenticeship training to further emphasise the importance of diversity within the building services engineering sector.

**Inclusion** means fully accepting and integrating learners, apprentices, and staff from all backgrounds to foster a culture of belonging, engagement, and participation across Runway Training. It is Runway Training’s fundamental belief that our working and learning environments should be open, inclusive, and respectful for everyone.

### **Bullying and Harassment**

A person who behaves in a way that bullies or harasses another is equally acting in a manner that does not align with Runway Training’s company values of Respect, as well as the British Values Runway Training supports, as outlined in this Policy.

All allegations of unacceptable behaviour or working practices will be thoroughly investigated and dealt with appropriately.

### **Bullying**

- Bullying is unwanted behaviour by an individual or group that is offensive, intimidating, malicious or insulting, or an abuse or misuse of power that undermines, humiliates or causes physical or emotional harm.

Bullying may be:

- a one-off incident or part of a repeated pattern.
- carried out face-to-face, in writing, over the phone, or online via social media or other digital platforms.
- visible to others or subtle and challenging to detect.
- deliberate or unintentional—what matters is the impact on the individual.

Bullying can take place between staff, between learners or apprentices, or between staff and learners/apprentices. It may occur in the workplace or in any Runway Training-related environment.

Examples of bullying behaviour may include, but are not limited to:

- offensive jokes, comments, songs or gestures.
- repeated criticism, public humiliation, or exclusion from meetings or social events.

- spreading malicious rumours, gossip or false information.
- undermining someone's work, taking credit for their achievements, or unfairly overloading them.
- unwanted physical contact or non-consensual touching.
- online harassment such as harmful or abusive messages, posts or images.
- deliberately isolating, marginalising or ignoring someone.

Bullying may also amount to harassment, which is unlawful under the Equality Act 2010, where it relates to a protected characteristic such as age, disability, gender reassignment, race, religion or belief, sex or sexual orientation.

Even where bullying does not meet the legal definition of harassment, it is still unacceptable and will be treated seriously.

Bullying differs from reasonable actions taken by managers, teachers, or employability advisers, such as setting performance expectations, giving feedback, or distributing work fairly. These actions should always be conducted in a respectful and professional manner.

### Peer on Peer/Child on Child Abuse

Runway Training recognises the importance of remaining vigilant to the fact that children and young people can misuse or abuse their peers. This can manifest as inappropriate behaviour that, to the perpetrator, may seem like "harmless fun", such as banter or jokes, but it can escalate to more serious issues, including bullying, sexual or physical abuse, and both consensual and non-consensual photography. Staff should challenge all inappropriate behaviour among peers and not overlook or minimise genuinely abusive actions. If other stakeholders have concerns, these must be reported to the DSLs.

It can take place in person, online or via a mobile phone or other technology. Runway Training takes child-on-child and peer-on-peer abuse seriously. It should not be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. This type of abuse may be investigated under Runway Training's Safeguarding Policy and Procedures.

### Harassment

Harassment can take many forms and is defined as unwanted conduct related to age, disability, gender identity, sex, sexual orientation, race, religion or belief, marital or civil status, pregnancy or maternity, or any other personal characteristic that aims or results in violating a learner's or staff member's dignity or creating an intimidating, hostile, degrading, or offensive environment for employment, study, or social life.

The defining feature is that the behaviour is unwanted by the recipient, unwarranted by the working or study/social relationship, and would be regarded as such by any reasonable person. Unwanted behaviour can be physical, verbal, or non-verbal, such as ignoring someone. It may be repetitive, sporadic, or an isolated incident directed at a person or group. The behaviour could be considered harassment even if the person engaging in it did not intend to offend, regardless of whether the person it was aimed at witnesses it.

Differences in attitude, culture, or misinterpretation of social signals can mean that what one person perceives as harassment may not seem so to another.

Harassment may not always be intentional, but it is always unacceptable. It may be directed at an individual or a group.

Disabilities may be visible or hidden, and include physical disabilities, learning disabilities and mental illness.

Harassment on grounds of disability may include:

- unwelcome discussion of the effects of a disability on an individual's personal life.
- refusal to work/study alongside a person with a disability.
- communicating with a person with a disability via a third party.
- excluding a person with a disability from social events or meetings.
- uninvited, patronising or unnecessary assistance with work/study.
- prejudging an individual's capabilities without reference to him/her.
- mischievous interference with personal aids or equipment. Gender harassment is any behaviour, deliberate or otherwise, pertaining to gender and/or a person's gender identity, which is unwanted by the recipient and creates an intimidating, hostile, degrading or offensive environment for employment, study or social life. It may be directed at an individual or group.

### Rights of Disabled People

Runway Training values people with disabilities and prioritises their needs. As an employer, Runway Training welcomes and supports the Disability Confident scheme and makes every effort to ensure that people with disabilities who apply for jobs receive full and proper consideration, and that reasonable adjustments are implemented to enable them to perform their roles.

Under the terms of this policy, Runway Training will:

- Make reasonable adjustments to support an employee who becomes disabled, such as providing training or special equipment.
- Give full and proper consideration to disabled people applying for jobs, taking into account making reasonable adjustments for their aptitudes and abilities to enable them to perform the role.
- Ensure that Runway Training learners, apprentices, and staff with an identified disability or additional learning needs receive reasonable adjustments and appropriate support from Runway Training and its partners throughout their programme of learning or employment with Runway Training.

**Gender harassment** may include abusive comments or jokes about an individual's gender, gender identity and/or gender reassignment, being a trans or gender-neutral person, 'dead-naming' a trans person, and making comments or jokes about a person's capabilities based on assumptions about gender.

**Sexual harassment** is any unwanted conduct of a sexual nature, that violates a person's dignity, and/or makes them feel intimidated, degraded or humiliated, and/or creates a hostile, offensive or sexualised environment. Sexual harassment may occur between members of the same sex or of the opposite sex. It may be directed at an individual or a group.

Sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing and appearance, calling someone sexualised names, making sexual 'jokes', or taunting.

Complaints regarding the behaviour of men and women, whether directed towards members of the same or a different sex, will be treated equally seriously. Runway Training's Transgender Support Policy and Procedures for staff, learners, and apprentices provide guidance, information, and resources to help staff, learners, and apprentices understand gender identity and gender reassignment.

**Racial harassment** is any behaviour, deliberate or otherwise, relating to race, colour, ethnic or national origin, that is unwanted by the recipient and creates an intimidating, hostile, degrading or offensive environment in employment, study or social life. It may be directed at an individual or a group.

Racial harassment may include:

- abusive comments about racial origins and skin colour.
- racist insults, jokes, and comments about capability.
- racist graffiti or offensive material.
- Exclusion or ignoring someone based on racial assumptions.

**Harassment based on religion, belief, or non-belief** includes any behaviour, whether deliberate or not, relating to a person's religion or similar belief or non-belief that is unwanted by the recipient and creates an intimidating, hostile, degrading, or offensive environment in employment, study, or social life.

Grounds may include:

- refusal to work/study alongside a person because of their religion/belief or non-belief.
- excluding a person from social events or meetings on the grounds of their religion/belief or non-belief.
- prejudging an individual's capability on assumptions relating to their religion/belief or non-belief.
- making offensive comments or jokes about a person's religion/belief or non-belief.

**Direct discrimination** occurs when someone is treated less favourably than another because of a protected characteristic.

**Indirect discrimination** happens when an organisation's policies, practices, or procedures indirectly disadvantage individuals with certain characteristics. It can be justified if employers demonstrate they acted reasonably in managing their business.

**Associative discrimination** occurs when an individual is directly discriminated against or harassed because of their association with another individual who has a protected characteristic. Victimization occurs when an employee is treated less favourably because they have made or supported a complaint under the Act, or are suspected of doing so.

**Perceptive discrimination** is a form of direct discrimination and occurs when a person is treated less favourably because others mistakenly believe they have a protected characteristic and treat them accordingly.

**Dual discrimination** occurs when someone faces direct discrimination on two grounds. A person might be discriminated against because of disability and gender, or because of race and disability. Multiple discrimination occurs when a person faces direct discrimination across multiple aspects of their identity. For example, a black lesbian may experience racism, homophobia, and gender prejudice.

**Victimisation** occurs when a staff member, learner, apprentice, or other stakeholder is treated unfairly because they have made, supported, or are suspected of making or supporting a complaint or grievance under the Equality Act. They are not protected from victimisation if they have maliciously made or supported a false complaint. There is no longer a requirement to compare the treatment of a complainant with that of someone who has not made or supported a complaint under the Act.

**Reasonable adjustments** failure to make reasonable adjustments occurs when a physical feature, provision, criterion, or practice places a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic, and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

**Allyship** involves a person from a non-marginalised group partnering with a marginalised group and using their position to advocate for and advance the interests of the marginalised group.

### Hate Crime

Runway Training will not tolerate sexist, racist, disablist, homophobic, bi-phobic or transphobic hate incidents. This includes racial or religious hatred, encouraging racial hatred, and any form of violence or encouraging violence. If you are a victim or witness of a hate crime, we encourage you to report the incident, wherever it occurred, to a person you trust, such as your Teacher, Employability Adviser or Runway Training's Head of Quality and Safeguarding. Runway Training will provide help, advice, and support. You can report hate crime incidents by calling the safeguarding phone number, emailing the safeguarding inbox, or in person.

### Language

Runway Training recognises that prejudice and discrimination may arise or be reinforced by a person's use of language, which may not be neutral or free from personal bias. This includes writing, speech, published materials, emails, and social media. Rather than dictate what language people can and can't use, we ask all employees, subcontractors, learners, apprentices, and employers to conduct themselves professionally, exercise good judgement, and be aware of standard inappropriate or offensive references in relation to the protected characteristics outlined in this policy, and of the significant effect that using them can have on people.

Individuals should also refer to Runway Training's Communications Policy for detailed guidance on the procedures and sanctions related to viewing, sharing or attempting to distribute discriminatory, offensive or illegal electronic materials.

Runway Training is committed to equality, diversity and inclusion. We will ensure that the language and images used across all publications and electronic media are inclusive and non-discriminatory.

## 5. Roles and Responsibilities

It is the responsibility of all members of the Runway Training community to uphold the ED&I and Anti-Bullying and Harassment policy. Runway Training provides guidance and support to ensure all community members are equipped with the knowledge and skills to actively support and contribute to the delivery of the ED&I action plan and the achievement of the Equality Objectives.

### Governors are responsible for:

- Supporting Runway Training to fulfil its statutory duties
- Supporting Runway Training to create an inclusive and diverse environment
- Ensuring Runway Training's strategic plan commits to equality, diversity and inclusion
- Engaging with and representing the local community
- Ensuring we meet all our legislative duties, including the general and the specific duties of the Equality Act 2010 and all subsequent legislation
- Striving to ensure that the membership of the body of governors reflects the diversity of the learner/apprentice communities at Runway Training
- Monitoring equality and diversity reporting through the Governors' structure in this area

### The CEO and Senior Leadership Team are responsible for:

- Leading the promotion of an inclusive working and learning culture of awareness, understanding and respect. Implementing the Equality Act 2010, including the general and specific duties and all subsequent legislation, and this Policy, and to agree equality targets
- Evaluating ED&I data linked to learners, apprentices and colleagues in relation to engagement, recruitment, participation, achievement, and satisfaction
- Ensuring that sufficient resources are available to facilitate the effective implementation and maintenance of this policy
- Producing and publishing the annual Equality, Diversity & Inclusion report
- Ensuring the staff, learners and apprentices understand their responsibilities and are given appropriate support and training to enable them to carry out their duties
- Ensure equality, diversity and inclusion data is embedded within our self-assessment reports
- Challenge existing cultures and negative stereotypes
- Engage with the community
- Incorporating the promotion of equality, diversity and inclusion into Runway Training's business planning
- Establishing Runway Training's Equality and Diversity objectives. The Senior Leadership Team is responsible for implementing this policy and action plan throughout the business
- Ensuring all Runway Training's processes and practices (including recruitment, development and other personnel practices) promote fair and equal treatment
- Providing advice and support on equality and diversity issues to their managers and staff
- Undertaking monitoring activities to ensure the effective implementation of the policy
- Ensure all staff, learners and apprentices receive appropriate training of equality, diversity and inclusion and anti-bullying and harassment issues
- Setting and monitoring the ED&I objectives, targets, and action plan
- Commissioning and prioritising relevant ED&I training and development
- Ensuring they effectively lead by example in treating all colleagues and learners with dignity and respect and by being fair and reasonable in their attitudes and behaviours. The Head of Quality and Safeguarding has responsibility for leading the implementation of this ED&I and Anti-Bullying and Harassment Policy and action plan
- Providing advice, guidance, and support on the application of this policy to stakeholders
- Linking with appropriate equality bodies

### Managers are responsible for:

- Ensuring EDI is promoted through all activities, ensuring curriculum content/resources, promotional materials and similar reflect diversity and challenge stereotypes
- Supporting Runway Training to create an inclusive and diverse environment
- Supporting the implementation of the ED&I and Anti-Bullying and Harassment policy and action plan
- Ensuring colleagues have a clear understanding of Runway Training's approach to ED&I and supporting colleague development, as necessary
- Ensuring they effectively lead by example in treating all colleagues, learners and apprentices with dignity and respect and by being fair and reasonable in their attitudes and behaviours

### All staff are responsible for:

- Promoting an inclusive culture of awareness, understanding and respect
- Challenging inappropriate or discriminatory behaviour
- Contributing to self-assessment reporting on how equality, diversity & inclusion are promoted in their areas

- Reporting incidents of discrimination, bullying and harassment
- Attending and completing relevant training to understand the policy and the implications for their role and responsibilities
- Familiarising themselves with any related procedures and codes of practice
- Adopting appropriate behaviour towards learners, apprentices, members of the public and other employees in a manner that promotes good practice in equal opportunities
- Reflecting policy requirements in their written communication and publications both within and outside the organisation

#### Teaching staff and Employment Advisers are responsible for:

- Developing schemes of work, lesson content and resources which recognise and promote inclusion and diversity
- Fully integrating and embedding equality and diversity within curriculum planning and teaching, learning and assessment
- Regularly reviewing the promotion of equality and diversity in individual subject areas and improving the opportunities identified in the scheme of work

#### Learners and apprentices are expected to:

- Promote an inclusive learning culture of awareness, understanding and respect
- Behave in a way which does not discriminate against, bully, or harass any individual or group
- Report incidents of discrimination, bullying and harassment

#### All stakeholders are expected to:

- Understand and implement the ED&I policy
- Treat everyone with respect, courtesy, and dignity
- Promote an inclusive and collaborative ethos
- Behave in a way which does not discriminate against, bully, or harass any individual or group
- Challenge behaviour that is not in accordance with this policy
- Value and celebrate the uniqueness of others
- Participate in training and development, and put the knowledge and skills gained into practice

#### As an Employer, Equality in the workplace means:

- Having trained staff who understand equality issues (and proactively promote these)
- Have appropriate policies in place and ensure that they are communicated to all their stakeholders, including Runway Training's learners and apprentices
- Provide training and guidance for all their staff to ensure the policy is adhered to
- Having staff who support Runway Training's vision and values, including our core value of Respect
- Having a community of staff that reflects the diversity of modern British society
- Having staff that will provide services fairly and effectively
- Has clear procedures regarding recruitment, development, and management of staff, which underpin our approach to equality, diversity and inclusion for our employees
- Review their policy regularly

All staff and delivery partners are responsible for upholding the commitments in this policy.

All staff are responsible for adhering to this policy in all their dealings with learners, apprentices, their employers, partners, external organisations, local communities, and with one another.

Staff, learners and apprentices who do not comply with this policy may be subject to Runway Training's Disciplinary/Behaviour Policies and Procedures.

Runway Training will:

- Operate a fair and open safer recruitment policy
- Make decisions about recruitment, selection, training, development, and career progression of our employees in a fair and unbiased way, solely based on objective criteria, individual merit, and ability
- Monitor, where practicable, the protected characteristics of job applicants and employees in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and use this information to assess the effectiveness of our policies
- Take proportionate positive action to promote participation of underrepresented groups in our workplace and learning programmes
- Take proactive steps to attract underrepresented groups through focused marketing efforts
- Make reasonable adjustments to accommodate the needs of disabled, non-disabled and neurodivergent job applicants and employees
- Interview all disabled applicants who meet the minimum criteria for a job vacancy and assess them based on their abilities
- Discuss with disabled employees regularly what we can do to make sure they develop and use their abilities
- Make every effort to ensure that employees who become disabled remain in employment
- Facilitate special training or support to enable employees to progress within the company
- Provide flexible working arrangements for staff
- Monitor provision of training and development opportunities for staff to ensure equal access
- Rigorously address concerns about bullying, harassment or victimisation through our policies
- Ensure that terms and conditions of employment, procedures for redundancy and dismissal are free from all forms of direct or indirect discrimination

As a Training Provider, Runway Training delivers training to a wide range of learners, apprentices, and their employers from diverse backgrounds and communities across England.

To ensure equality of opportunity, we will:

- Ensure information about our programmes is accessible and written in 'plain English', and provide information in different formats where required
- Ensure our application and assessment procedures are clearly explained and fair, including for learners and apprentices with learning difficulties or disabilities, so that we do not create unnecessary barriers to participation
- Create a secure and inviting environment in our training centres and office locations
- Assess learners and apprentices' individual needs to identify any support requirements for extra learning needs and make reasonable adjustments
- Integrate equality, diversity, and inclusion issues into Runway Training's teaching and learning curriculum to raise awareness and promote good citizenship and British Values
- Challenge discrimination and negative behaviour, and empower everyone to do the same
- Gather, process, and analyse equality data across our training provision; make required regulatory returns to the DfE; and take positive action to address gaps in achievement between different groups to ensure parity of outcomes for all
- Celebrate success to foster equality, diversity, and inclusion, and to motivate others to succeed
- Collaborate with colleagues across the organisation to promote and support equality, diversity, and inclusion, including through staff-led community groups to drive ongoing improvement
- Consult with external partners and representative groups to ensure Runway Training aligns with the broader industry and collaborate to advance progress towards greater inclusio

- Ensure that Runway Training has an up-to-date equality, diversity, inclusion, anti-bullying, and harassment policy in place that includes suitable channels and procedures for individuals who may need to raise concerns, make a disclosure, complaint or grievance
- Implement regular feedback processes with learners, apprentices, and staff to explore and reinforce understanding of equality, diversity, and inclusion, offering opportunities for discussion, reflection, and support where needed.

## 6. Complaints

If an individual believes they have experienced any form of discrimination, harassment, or victimisation by a Runway Training employee, subcontractor, or another learner or apprentice, we take this very seriously.

We have the following procedures in place to deal with complaints:

- Learners, apprentices and employers can raise a complaint formally through Runway Training's Comments, Compliments and Complaints Procedure
- Employees can raise complaints formally through Runway Training's Discipline and Grievance procedure
- Partners and service users should send their complaints to our Head of Quality and Safeguarding
- Runway Training will investigate all complaints thoroughly and address them appropriately

Runway Training will monitor incidents and complaints related to equality and diversity, and all staff will take responsibility for challenging, recording and reporting discriminatory behaviour, harassment, and victimisation concerning protected equality characteristics.

Runway Training's Policies will enable those who believe they have been victims of discrimination and harassment to raise concerns and obtain redress without undue delay or difficulty.

Any stakeholder who becomes aware of discriminatory behaviour, harassment or victimisation has a duty to report this in accordance with this policy and other relevant policies.

- Staff should make informal complaints through their line manager (or other appropriate manager when the complaint is in relation to the employee's line manager)
- Formal complaints should be directed through the grievance procedure in consultation with Human Resources, who will offer guidance and support.
- Learners should direct complaints through their Apprenticeship Teachers/Assessor, Tutor or any member of staff they feel comfortable approaching

Runway will provide a supportive environment for those who make claims of discrimination, bullying or harassment.

All concerns, complaints, disclosures and grievances will be thoroughly investigated, and appropriate solutions sought. We will implement company-wide solutions where applicable.

## 7. Procedures

If the organisation suspects that a colleague may have been bullying or harassing another colleague, regardless of whether a formal complaint has been made, it will begin an investigation into the alleged bullying or harassment. All colleagues have the absolute right to complain if they believe another colleague's behaviour constitutes bullying or harassment. When appropriate, the colleague may choose to speak directly to the individual responsible and request that they stop. This may result in an informal resolution.

The colleague who is the subject of the allegations should be given the opportunity to respond as part of the investigation. If there is uncertainty about how to escalate a concern, complaint, disclosure, or grievance, the HR team is available to provide confidential support and advice. All reports will be escalated to the Head of Quality and Safeguarding to ensure that any safeguarding needs are identified and addressed.

If it has not been possible, or it is not appropriate to resolve the matter informally, the colleague should refer to the staff grievance and disciplinary policy and formal process. The Company's 'Grievance and Disciplinary Policy' is available on SharePoint for further information.

At this stage, the colleague should seek advice from their line manager, who will consult with the Head of HR or the Head of Quality and Safeguarding, or the colleague can discuss the matter directly with the Head of HR or the Head of Quality and Safeguarding, as necessary. The Head of HR or Head of Quality and Safeguarding must initiate a suitable confidential investigation to resolve the issue as swiftly as possible. Temporary relocation or authorised paid leave may be considered to facilitate a thorough and fair investigation. Bullying, harassment, or victimisation may amount to gross misconduct and must be fully investigated in every case under the grievance and disciplinary policy.

As soon as possible after the investigation concludes, the organisation will inform the colleague suspected of bullying or harassment of the outcome. The organisation will then decide whether it is appropriate to proceed with disciplinary action against that colleague. Any disciplinary proceedings, where possible, will be conducted by a manager other than the one who carried out the investigation.

If the bullying, harassment or victimisation relates to the colleague's manager and the colleague does not feel able to raise this in the first instance with him/her, the colleague should inform their manager's manager or the Head of HR, who will arrange for the matter to be investigated, any investigation will include a suitable member of senior management and or a Governor;

- Any colleague found in breach of this policy may be subject to disciplinary action up to and including dismissal
- In cases of discrimination-related harassment, the consequences for employers and individuals can be serious
- The organisation reserves the right to suspend or temporarily redeploy either the colleague suspected of bullying or harassment, or the colleague raising a concern, complaint, disclosure, or grievance of bullying or harassment, during the investigation, if it is considered in the best interests of the individual(s) or the organisation to do so. Suspension in these circumstances does not constitute disciplinary action and will be on full pay. The Company will fully support any colleague who raises a concern, complaint, disclosure, or grievance of bullying, harassment, or victimisation, but if that concern, complaint, disclosure, or grievance is found to be untrue and has been made irresponsibly, they may be subject to disciplinary action.

### Staff procedure

If a learner, apprentice, or another colleague confides in a member of staff that they are being harassed or bullied, they will be taken seriously and treated sensitively.

The individual will be informed of the formal procedure and how to proceed. If the decision is to formalise the incident, the individual must complete a safeguarding concern/disclosure form or be supported to do so.

The incident will be fully investigated by the relevant DSL or Head of HR, unless it requires the involvement of another member of the SLT and/or a Governor. The individual will be kept informed of any action taken to investigate the allegation through discussion and written communication.

If a member of staff witnesses bullying or harassment, they will do the following:

- Obtain the name of the individual(s) concerned and report the incident to the DSL as soon as possible.
- For serious incidents, the DSL must inform the Head of Quality and Safeguarding and Head of HR if it involves a member of staff, who may request the suspension of the individual(s) if necessary.
- During and after any investigation, the situation will be monitored to ensure that bullying does not recur. Any investigation should include recommendations for a named member of staff, such as a teacher or an employability adviser, to monitor the situation.

### Learner/Apprentice Procedure

If you feel that you are being or have been bullied or harassed, you should talk to your teacher, employability adviser, or another member of staff that you can trust about what has happened. If you feel unable to do so, please contact the Safeguarding Team directly via the safeguarding telephone number or the safeguarding Inbox.

We will take your concerns seriously and listen to what you have to say, and explain actions that can be taken, including:

- **Either)** Formally report the incident by completing a safeguarding concern and disclosure form. This means that Runway Training will investigate the incident, and you will be kept up to date on any actions taken.
- **Or)** Not taking any further action now. You can choose to report the incident at a later date or if it happens again, and we will investigate.

### Responding to Cyber Bullying

If you are told of a learner, apprentice or colleague who is being bullied/cyberbullied:

- Provide appropriate support for the person being bullied – making sure they are not at risk of immediate harm. Involve them in decision-making as appropriate
- Record the incident, including the action taken using the safeguarding concern and disclosure form, and inform the relevant DSL, who will record it in the Central Safeguarding Register. If it is deemed to be a Safeguarding concern/disclosure, the DSL will ensure you support the individual appropriately
- If the incident does not constitute a criminal offence, work with those involved to ensure upsetting material is removed from devices and services as quickly as possible – seeking support from Runway's Head of Quality and Safeguarding
- If the incident does constitute a criminal offence, it should be reported according to Safeguarding and Child Protection Policy protocols. The DSL should be informed, and evidence should be secured appropriately
- Inform other staff members, parents and carers, where appropriate, but **do not** breach the Data and Information Sharing legal requirements; if in doubt, ask the DSL or the Head of Quality and Safeguarding. You can also refer to the Information Sharing Flowchart in the Safeguarding and Child Protection Policy.
- Work with the person bullying to restore relationships and make sure all persons involved feel safe inside and outside the learning environment. Where there is evidence of bullying behaviour, appropriate sanctions should be applied
- Individuals who have been bullied should feel safe and confident that there will not be a repeat incident, and that there have been learnings from the incident.

## 8. Training:

Runway Training's employees should be informed of this policy during their induction. All employees must complete equality and diversity training as part of their initial training package. Runway Training will regularly organise additional mandatory ED&I training as needed, including LGBTQ+ training. We will seek to collaborate with and involve employees, service users, and other interested parties on ED&I issues and initiatives, and to raise awareness of the importance of ED&I within the communities we serve.

## 9. Monitoring

Runway Training regularly monitors and reviews data to assess and support the effectiveness of this policy. Data is processed in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

- Runway Training routinely collects and analyses information on employees, applicants, learners and apprentices by age, gender, marital status, and ethnic origin. Information regarding the number of staff, learners and apprentices who declare themselves as disabled is also maintained
- Runway Training will monitor employee data on an annual basis in relation to recruitment, selection, learning and development and equal pay to assess the equality of opportunity afforded to staff, and the diversity balance achieved in our workforce
- Data on learner recruitment, retention and achievement will be analysed and evaluated regularly by demographic breakdown to assess parity of starts, outcomes and retention across different groups
- Staff, learners and apprentices are consulted to gain their input and feedback in relation to equality, diversity and inclusion.
- Partner policies in relation to equality and diversity are verified annually as part of annual contract due diligence reviews
- The SLT and Governors review progress against Runway Training's agreed Equality objectives quarterly, as well as progress against action plans related to the maintenance and development of Runway Training's equality, diversity and inclusion-related accreditations and memberships

Runway Training will plan, monitor and evaluate the success of its efforts to promote diversity and equality in employment and service delivery.

Monitoring employment data:

- Staff development
- Retention/Turnover
- Sickness/Absence
- Disciplinary
- Grievances

Monitoring information within the curriculum areas on:

- Recruitment, retention, achievement, and success of learners and apprentices in relation to age, ethnicity, disability and gender or any other relevant criteria
- Enrichment
- Progression
- Learner/Apprentice satisfaction
- Comments, Compliments and Complaints
- Disciplinary records

### Measuring Impact:

- Runway Training is committed to the collection and analysis of data to assess performance, identify emerging issues, areas of success and measure the impact of corrective actions.
- Equality, Diversity and Inclusion reports, the Quality Improvement Plan and any subsequent update will detail how the ED&I and Anti-Bullying and Harassment Policy will be implemented
- Specific targets for improvement will be set, regularly monitored via SLT and Governors meetings, and an annual report on progress, success and key issues will be presented to the Governors.

Runway Training will, where appropriate and agreed, and for a specific period of time, consider positive action measures to alleviate disadvantage experienced by people who share a protected characteristic, reduce their underrepresentation in relation to activities, or meet their specific needs. We will ensure that any positive action complies with the law.

Runway Training is committed to providing equal opportunities and celebrating diversity in all aspects of its work, and to avoiding unlawful discrimination, harassment and victimisation of staff, learners, apprentices and customers. We are committed to advancing equality of opportunity across different groups.

An annual report will be produced detailing ED&I progress against the ED&I strategy and action plan.

### ED&I Objectives (Impact measures)

- To establish an inclusive culture, creating an environment that is free from discrimination and in which difference is respected, valued and celebrated
- To establish and maintain a diverse workforce that is reflective of modern Britain and in which colleagues feel they are treated fairly and valued
- To recognise the needs of different members of the Runway Training community and, wherever possible, make reasonable adjustments
- To increase engagement, participation, progress, and achievement of those currently underrepresented in Runway Training
- To support individuals to gain a greater understanding of ED&I and further promote inclusive practice.

## 10. Linked Policies

This policy is supported by several other policies and associated procedures with which it should be cross-referenced, including, but not limited to:

- Comments, Compliments and Complaints Policy and Procedure
- Health & Safety Policy
- Safeguarding and Child Protection Policy
- Online Safety and Social Media Policy
- Neurodiversity Policy
- Staff Handbook
- Staff Discipline and Grievance Policy
- Runway Training Learner/Apprentice Handbook
- SEND Policy
- Communications Policy
- Whistleblowing Policy
- Safer Recruitment Policy and Procedures
- Quality Policy
- Staff Code of Conduct

- Learner and Apprentice Behaviour Policy
- Data and Information Security Policy

## 11. Legislation and Guidance

Runway Training welcomes and fully accepts its responsibilities and will adhere to all relevant UK equality legislation, including, but not limited to:

- Equality Act 2010 updated in 2025. The Worker Protection (Amendment to Equality Act 2010) Act 2024 - Introduced a legal duty for employers to take reasonable steps to prevent sexual harassment. Under these pieces of legislation, a member of staff may be held individually liable for an act of bullying or harassment, as well as their employer being held vicariously liable for the staff member's actions.
- The Rehabilitation of Offenders Act 1974, updated October 2023
- Protection from Harassment Act 1997
- Human Rights Act 1998
- Sex Discrimination (Gender Reassignment) Regulations 1999
- Racial and Religious Hatred Act 2006
- Protection from Harassment Act 1997
- Online Safety Bill 2023, fully implemented in July 2025
- Health and Safety at Work Act 1974.
- Keeping Children Safe in Education 2025
- Prevent Duty Guidance (2023) and any subsequent amendments or updates
- Working Together To Safeguard Children (2025)
- Equality and Human Rights Commission: Sexual harassment and the law (2017)
- General Data Protection Regulation (GDPR UK) 2018 - Data Protection Act 2018, the UK's Data Use and Access Act June 2025, brings targeted amendments to the UK GDPR regime
- The Employment Rights Act (1996)
- Information sharing: advice for practitioners providing safeguarding services (April 2024)
- Counter-Terrorism and Security Act 2015 was further strengthened with the Counterterrorism Sentencing Act 2021. CONTEST last updated 2023
- Domestic Abuse Act 2021, which includes the Domestic Violence Disclosure Scheme, known as **Claire's Law** 2014. Last amended in 2025
- Sexual Offences Act 2003
- Advisory, Conciliation and Arbitration Service (ACAS) Guidance

## 12. Review

This policy will be reviewed annually. Where necessary, the review will be more frequent to ensure compliance with current legislation.