



NiNe Training Limited

Anti-Bullying and Anti-Harassment Policy 2025

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Purpose:

The purpose of this policy is to set out NiNe's commitment to fulfilling its duty in providing a safe environment for learners, staff and others.

NiNe Training Limited is committed to providing a safe, respectful and inclusive environment for all learners, staff and subcontracted staff. Bullying, harassment and victimisation will not be tolerated and will be addressed promptly and fairly.

Scope:

This policy applies to behaviour occurring in training venues, employer premises, school settings, online learning environments and any activity connected to NINE provision. This policy applies to employees, learners, employers, visitors and sub-contractors. This policy cannot be viewed in isolation and must be read in conjunction with the following policies:

- NiNe Equality, Diversity & Inclusion policy
- NiNe Safeguarding policy
- NiNe Complaints policy
- NiNe Grievance policy
- NiNe Whistleblowing Policy

Bullying and harassment of any kind is a serious issue which can affect people's health, work performance, promotion, job prospects, learning and achievement. NiNe are committed to eliminating all forms of intimidation, bullying or harassment, wherever they are identified.

This applies to bullying and harassment relating to the nine protected characteristics of:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation



Policy Aims

To raise awareness of the impact of bullying and harassment in its various forms by:

Ensuring that all staff are fully aware of their responsibilities and policies and procedures in place

Providing information to learners through the Learner Handbook

To ensure vigilance in the identification of bullying and harassment in its various forms through:

Observations of teaching, learning and assessment.

Providing channels for learners, employees and others to raise concerns in a safe and supportive manner

To provide a clear commitment to learners through:

Consistent application of this policy and reporting procedures

Ensuring that all instances/ allegations of bullying or harassment, receive either informally or formally, are dealt with promptly, sensitively, fairly, objectively, confidentially and seriously, through the established procedure

Ensuring that the policy is made available at all delivery venues and that, when required, the contents are explained to learners and other users

Supporting learners to report any instances of bullying and harassment

Where bullying or harassment involves a learner under 18, or gives rise to safeguarding concerns, the matter will be escalated in line with the Safeguarding Policy.

Impact on the Learner:

The implementation of this policy will ensure that all learners are able to complete their learning programmes in a safe environment free from bullying and harassment.

Definitions:

Bullying is the intimidation or belittling of someone through the misuse of power or position that leaves the targeted individual feeling hurt, upset, vulnerable, fearful, isolated or helpless. Bullying may take place in person, online, via social media, messaging platforms or other digital communication.



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

Sexual harassment is defined as "any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, undertaken with the intention of effecting or violating the dignity of a person". This is particularly prevalent when done with the purpose of "creating an intimidating, hostile, degrading, humiliating or offensive environment."

Racial harassment is any unwelcome or hostile act or series of acts carried out by a person wholly or partly because of the racial origin of the targeted individual or group, which is perceived by the recipients to be racially offensive.

Disability harassment is unwanted conduct based on or around a perception of an individual's disability that affects the dignity, confidence levels or opportunities in or around their place of study.

Harassment or bullying may include:

Physical – actual assault, threatening gesture or other aggressive or offensive behaviour

Verbal – spoken, textual or pictorial words or images which are threatening, defamatory, humiliating, abusive, sexually suggestive or racially offensive, including malicious gossip, comment, jokes or banter

Non-verbal – isolation, exclusion or segregation; abuse of power, removal of responsibility, behaviour which undermines confidence or unfair sanctions

Harassment may be an isolated or repeated occurrence against one or more individuals. It may equally be part of a pre-meditated campaign of some of the behaviour described above.

It is not the intention of the perpetrator of the bullying or harassment that is of primary concern, but rather the conduct itself and its impact on the recipients which constitute bullying or harassment.

Equality is about creating a fairer society where everyone can participate and has the same opportunity to fulfil their potential. Equality is backed by legislation designed to address unfair discrimination based on membership of a particular group.



Legal and Regulatory Framework:

NiNe is fully aware of its obligations within the following legal framework and is committed to meeting its legal requirements.

- Children's Act 1989
- Welsh Language Act 1993
- Human Rights Act 1998
- Equal Pay Act (EPA) 1970 (Amendment) Regulations 2003
- The Equality Act 2010
- Well-being of Future Generations (Wales) Act 2015

NiNe will ensure compliance with the requirements of any future legislation.

Responsibilities:

The following outlines the requirements of NiNe, however they may be adapted to suit individual organisational structures without diluting the overarching responsibility.

The Directors have responsibility for:

- Ensuring NiNe fully meets its legal requirements
- Ensuring the policy meets the requirements of relevant legislation
- Ensuring effective implementation and monitoring of the policy
- Ensuring the policy is reviewed and that all employees receive appropriate training

The Directors and Head of Operations have responsibility for:

- Providing a consistently high-profile lead on all issues contained within the policy
- Ensuring all aims and objectives of the policy are effectively implemented
- Ensuring all employees are fully aware of their individual and collective responsibilities
- Providing appropriate training and development activities to ensure employees have the skills and knowledge to support this policy
- Ensuring that appropriate action is taken against anyone found to be in breach of the content of this policy
- Proactively communicating commitment to this policy to learners, employers, employees and external stakeholders
- Ensuring their team members are made aware of their responsibilities and are provided with appropriate training and support
- Acting against any identified bullying and harassment following the appropriate procedures



All employees have responsibility for:

- Remaining vigilant to potential bullying and harassment
- Effectively identifying and challenging bullying behaviour
- Ensuring own conduct cannot be perceived as bullying or harassment
- Challenging and reporting any bullying or harassment identified following the appropriate procedures
- Speaking out if they witness or are aware of discrimination, bullying, unfair treatment or harassment
- Supporting learners to address any bullying and harassment they may experience as appropriate

All learners have responsibility for:

- Taking equal responsibility in ensuring that we create a learning environment where people are valued and respected
- Effectively challenging any form of bullying or harassment
- Speaking out if they witness or are aware of discrimination, bullying, unfair treatment or harassment

Communication:

This policy and any updates will be disseminated to all NiNe employees through team meetings and will be made available on the company SharePoint. All new employees will be advised of this policy as part of initial induction.

Employers and learners will be provided with access to this policy in an appropriate format.

This policy will be made available bilingually and in large print upon request.

Learner reporting procedure:

The company's zero tolerance stance means that incidents should be dealt with as quickly as possible. Every effort will be made to ensure the safety of the victim whilst on a training programme.

Any learner wishing to report an incident that takes place whilst on site or during a session facilitated by NiNe staff about another learner should, in the first instance, speak to their trainer coach.

Assessors can also register a learner's concern on a Cause for Concern and forward these to the safeguarding officer to be addressed in line with safeguarding procedures.



Where a learner wishes to raise an issue regarding bullying in the workplace, they should follow their companies relevant anti-bullying/whistleblowing policy and procedure.

Where a learner wishes to raise an issue regarding a member of staff the complaints policy and procedure will be followed.

Employee reporting procedure:

Where an employee wishes to lodge a complaint, they should refer to the 'Complaints Procedure' which specifically addresses the process and appropriate personnel.

Where concerns relate to serious misconduct, safeguarding failures or management wrongdoing, staff may raise concerns under the Whistleblowing Policy.

Complaints:

NiNe will not tolerate abuse, prejudice, harassment or bullying. Investigations will be conducted promptly, impartially and proportionately. All parties will have the opportunity to present their account, in accordance with the NiNe Complaints Policy and Procedure.

Outcomes may include mediation, behavioural agreements, disciplinary action or safeguarding referral, depending on the severity of the concern.

Monitoring and Review processes:

This policy will be reviewed annually in July or earlier where legislative or safeguarding guidance changes.