



Equality and Diversity Policy

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EDI Policy Statement

Game-On Coaching are highly committed to equality and diversity both within, and outside the workplace.

The policy and procedures are a guidance for all staff, apprentices, partners and anyone associated with Game-On Coaching and are there to help everyone understand their responsibilities in supporting the commitment to equality, diversity and inclusion. The policy outlines what is meant by this, the relevant laws and associated codes of practice, Game-On Coaching expects all staff, apprentices and any other associates to abide by.

Our aim is to develop and maintain a positive working environment for our employees, clients and apprentices, that is free from any forms of unlawful and unfair discrimination. Apprentices, clients and employees will receive equal and fair treatment, alongside the promotion of opportunity, irrespective of their personal criteria (including the following):

- Race
- Skin colour
- Nationality
- Religious belief or affiliation
- Gender
- Sexual orientation
- Transgender
- Material or family status
- Age
- Current or previous disability
- Ethnic or national origin
- Pregnancy

Regarding the above characteristics (but not limited to):

- Game-On Coaching value others for their contributions and irrespective of personal differences and strive to provide a supportive and inclusive working environment where everyone feels that they are valued and can work to achieve their potential.
- Game-On Coaching aim to avoid all forms of unlawful discrimination and are committed to promoting an environment that is free of any forms of bullying or harassment, victimisation or unlawful discrimination. The company aims to promote dignity and respect for all, with differences being recognised and valued.
- No applicant, apprentice, customer, client or member of staff will receive less favourable treatment, nor will any other condition or requirement that cannot be justified disadvantage them.
- Through the policy, Game-On Coaching aim to support all associates and will continually reappraise methods to support Equality, Diversity and Inclusion (EDI).
- EDI will be a key focal point when it comes to recruitment and selection, job descriptions, the interview process and any selection procedures. It's also applicable to training and education, including apprenticeship delivery.

Game-On Coaching will do the following:

- Implement fully the Equality Act 2010 and any legislation that will eliminate discrimination or harassment.
- Oppose any forms of discrimination and unfair discriminatory practices and harness the diversity of our staff, apprentices, partners and any other associates with Game-On Coaching.
- Expect anyone associated with us to embrace the core value of respect and create an environment that ensures all individuals are treated with fairness and respect.
- Tackle any prejudice and promote understanding between different groups of people to create a respectful workplace.
- Take proportionate positive action to encourage under represented groups participation in our workplace and apprenticeship programmes.
- The policy applies to our employment practices (including recruitment), training provisions and any activity undertaken by the company.
- The overall responsibility to implement, promote and provide equality and diversity rests with *all* staff, partner organisations, suppliers, apprentices and their employers are required to conduct themselves in ways that respects and supports the equality and diversity act at all times.
- The management team, including directors, will establish objectives and impact measures on an annual basis and regularly review these to continually support and improve our performance.

Scope/Objectives

This policy is applicable to all associated with Game-On Coaching Coaching and all contracts agreed with regards to Government Funded Apprenticeships.

This policy makes clear Game-On Coaching's stance on Equality and Diversity and establishes the key principles, structures and monitoring arrangements that are used:

All above are associated with the promotion and advancement of this policy. Any behaviours, actions or words that transgress this policy will not be tolerated and will be dealt with in accordance with the relevant policy or procedure.

Definitions

Equality refers to treating people fairly and recognises that some people have needs that must be met to enjoy equal access during employment and education. Game-On Coaching recognises that some individuals may need reasonable adjustments and support to ensure equality of opportunity if they come from a position of long-standing disadvantage.

Diversity refers to understanding that individual and professional differences are natural within society and when recognised and can create opportunity. Valuing diversity acknowledges the intrinsic worth of benefits derived from the differences and seeing them as a strength. Game-On Coaching will celebrate the values and differences. Game-On Coaching aim to promote a mutual understanding of the differences and use them as a strength. Game-On coaching will encourage the discussion and understanding of these differences to reinforce diversity within the industry.

Inclusion refers to accepting and integrating apprentices and staff regardless of their backgrounds. Game-On Coaching want to create a culture of belonging and participation. The working environment must be open, respectful and inclusive.

Hate crime:

As per the Metropolitan Police, a hate crime is defined as below

A hate crime is defined as '*Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice based on a person's race or perceived race; religion or perceived religion; sexual orientation or perceived sexual orientation; disability or perceived disability and any crime motivated by hostility or prejudice against a person who is transgender or perceived to be transgender*'.

Apprenticeship Diversity Champions Network (ADCN)

Game-On Coaching strongly supports and recognises the ADCN and appreciates the work that is being done that allows and encourages a fair opportunity is given to all when it comes to providing apprenticeships. Game-On Coaching will actively encourage people from a diverse background to consider taking part in apprenticeships. Game-On Coaching will look to benchmark themselves against the companies that are successful in promoting positive equality and diversity and can look at following strategies implemented by some of the active members of the ADCN.

An annual report is provided by the ADCN which will help provide guidance, strong practice and positive actions to help apprenticeship providers achieve their aims in supporting diversity. One of the aims of Game-On Coaching is to respond to the 'call to action' and actively look to support and increase the diversity among apprentices. Game-On Coaching will follow closely the ADCN and look to promote positive actions and look to try new initiatives and improve current practice when it comes to equality and diversity.

The messages received from the annual report written by the ADCN will be actively included in all training materials and used as positive discussion points amongst all associated with Game-On Coaching. See below a link to the ADCN reports
[Apprenticeship Diversity Champions Network - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/organisations/apprenticeship-diversity-champions-network)

Promoting the EDI Policy

Game-On Coaching recognises there are various channels that they can utilise in order to communicate and give regular updates around EDI. They are as below:

- Available on website under 'policies', for any stakeholder to access at any time.
- Posters in classrooms, to raise awareness of the signs of and EDI issues, who the EDI lead is, and their contact details, and how to refer.
- EDI Policy in apprentice handbook, this will include all the details as above.
- EDI awareness training in apprentice induction.
- EDI discussions in progress reviews with apprentice and line manager.
- EDI feedback in monthly 1-1 sessions.
- EDI training for all staff (as a minimum annual)
- Monthly EDI newsletter to apprentices and apprentices with updates.
- Virtual backgrounds containing the contact number of the EDI lead.
- LMS to have banners on the homepage which have the contact numbers of the EDI lead and any other relevant authority.
- EDI learning material to be given to employers, posters for staff rooms etc.
- Welfare curriculum embedded into any standard delivered.

How Stakeholders Will Engage with the Policy

Game-On Coaching aim for all to engage with the EDI policy and will do so by ensuring the following:

- Ensuring the policy is promoted to all associated with Game-On Coaching
- Understand that managing EDI is not a one-off initiative and requires constant review and monitoring
- Keeping up to date with law and reviewing policies, ensuring any updates are communicated effectively to all
- Employees will receive relevant training to help engage all associated with Game-On Coaching and be able to promote a positive, inclusive, and diverse working environment.

Within the workplace:

- Employees will be trained to understand and engage with EDI in their daily job roles
- All must show respect, dignity and equality to everyone.
- All are required to promote positive behaviour daily and be able to describe what this looks like

- The positive promotion of EDI will be implemented into the culture at Game-On Coaching

Communication:

- An open culture will be promoted based on active listening and open dialogue surrounding EDI
- All will have appropriate channels of ways in which to share their opinions, including all feedback to be reviewed by the senior management team
- Different methods of promotion will be used to help all engage with the policy (see promotion above)
- Feedback will be actively sought after and action will be taken if necessary

Associated Policies and Procedures

Bullying and harassment

Please refer to the Anti-Bullying Policy (Appendix 1)

Hate crime

Game-On Coaching will not tolerate any racist, disabled, sexist, homophobic, bi-phobic or transphobic hate of any kind. Game-On Coaching will not tolerate any racial or religious hatred or encourage any racial hatred or any form of physical and verbal violence or abuse.

If you are the victim or witness of the above, we encourage you to report the incident to someone you trust such as your tutor. Game-On Coaching will provide advice or support and individuals affected will receive reports via email, phone or in person

Language

Game-On Coaching understands that discrimination and prejudice may arise from a person's use of language. This includes when writing, speaking, social media, emails and published materials. Game-On Coaching ask all employees, apprentices, subcontractors, partners and employers to conduct themselves in a professional manner and to use good judgement and be aware of inappropriate references in relation to protected characteristics.

Individuals should refer to the communications policy for detailed guidance and procedures in relation to viewing, sharing or using discriminatory, offensive and illegal electronic materials.

Advertising and Information

Game-On Coaching will ensure that any publications and electronic media do not portray any language or images that discriminate.

Please refer to the Game-On Coaching Communications Policy and IT policy for further detail

Training

Game-On Coaching EDI training

Training raises awareness by addressing everyday workplace issues surrounding equality, diversity, and inclusion. Many people may not be aware of the unfair treatment or discrimination that their colleagues are facing, or perhaps someone is suffering in silence and doesn't know how to address the issue. The common issues that many people face at work are highlighted during the training and apprentices are advised on how to address these issues. High-quality training helps all employees to see the true value of an inclusive workplace and how to create one.

Employees

Game-On Coaching aim to make sure all staff are up-to-date with their EDI training by:

- Having the EDI Lead deliver EDI training sessions to all staff when appropriate
- Building awareness raising programmes into the required CPD programmes (continuous professional development)
- Ensure EDI training, such as any online training from the 'Education and Training Foundation' is completed as part of any staff induction.
- Having all staff complete EDI training annually, this will include group EDI refresher training from the EDI lead.
- Being trained on how to provide feedback and report any EDI concerns.
- All staff will be provided access to the latest EDI newsletters (such as the ADCN annual update) and relevant educational content.

Apprentices

All apprentices will complete an EDI training session as part of their induction process with Game-On Coaching. They will also be provided with newsletters and education content throughout their apprenticeship to ensure they remain up to date. Any incidents that go against the EDI policy will be dealt with accordingly.

Employers

Game-On Coaching will only associate with employers who adhere to the EDI policy (see responsibilities below)

Responsibilities

Game-On Coaching EDI's Responsibilities

Directors are responsible (but not limited to) the following:

- Ensure enough resources are available to implement the policy effectively and maintain the policy.
- Ensure equality is implemented into the ongoing business plan
- Ensure impact measures (EDIMs) are established and achieved annually

Senior management:

- Ensure that all practices and processes promote fair and equal treatment (including recruitment, development and personal practices)
- Deliver the equality objectives outlined.
- Provide ongoing support regarding equality and diversity to their staff
- Undertake monitoring activities, such as reviewing data from benchmarking competitors, and also reviewing our own data around EDI, to ensure the effectiveness of this policy.

Employee EDI Responsibilities

During the induction process, all employees will be guided through mandatory training to ensure they are aware of their responsibility and role when it comes to promoting equality, valuing diversity and avoiding discrimination

All employees will do the following:

- Undertake training regarding equality and diversity at induction, this will be in group training and also online module training.
- Complete annual training regarding equality and diversity, which will include a review of the current policies and an update on any changes that have been implemented.
- Undertake further training as and when required
- All staff are responsible to promote equality and foster strong relations between different groups.
- All staff must eliminate any discrimination amongst the protected characteristics
- All staff must challenge any inappropriate behaviour by either other staff members, employers or apprentices.

Recruitment Staff

- All staff involved in the recruitment processes are to attend recruitment and selection courses.

Apprentice & Employer EDI Responsibilities

Apprentices and their employers will also be advised of their EDI responsibilities as part of their induction and sign up process. They will also be able to access this policy on the company website. Apprentices will be provided with the EDI policy upon induction and must adhere to it at all times.

Any partner organisation and sub-contractors will have to reflect this policy within their own working practice and Game-On Coaching will not contract with anyone that doesn't meet these standards.

As part of the due diligence process, the policy and practices will be reviewed prior to entering any commercial relationships and reviewed annually during contracted reviews. Any policy breaches could lead to disciplinary action, up to and including dismissal or cessation of services.

Statutory responsibilities

Game-On Coaching accepts its responsibilities and will fully adhere to the UK Equality Legislation relevant to the organisation and its operations in England and Wales.

Key to these is the Equality Act 2010 and associated codes of practice for further education applicable to training providers. The Equality Act 2010 which forms the basis of this policy, uses the term 'protected characteristics' to refer to aspects of a person's identity that are explicitly protected from unlawful discrimination

Game-On Coaching is also required to comply with government funding regulations that define the age limits for advanced apprenticeship eligibility, as well as health and safety regulations in relation to disability.

Game-On Coaching as an Employer

Equality in the workplace is classed as the following:

- Ensuring staff are trained to understand equality issues and proactively promote equality and diversity,
- Having staff who support Game-On Coaching's vision and values, including our core value of respect (and pro-actively promote them)
- Having staff that will provide services fairly and effectively (and pro-actively promote them).
- Game-On Coaching has a clear procedure in relation to development, management of staff, and recruitment which underpins our approach to equality, diversity and inclusion for our employees.

Game-On Coaching will:

- Have a recruitment policy that is both open and fair.
- Make sure any decisions regarding recruitment are fair and unbiased.
- Take positive action in relation to encouraging participation of under represented groups both within our workplace and within the apprentice programme.
- Use our targeted marketing activity to take positive action when attracting underrepresented groups.
- Meet the requirements and make adjustments to aid disabled and non-disabled job applicants and employees.
- Discuss regularly with disabled employees about what they can do to help develop and use their abilities.
- If an employee becomes disabled, Game-On Coaching will make every effort to ensure they stay in employment.
- Game-On Coaching will facilitate training and support to ensure employees can progress within the company.
- Provide working arrangements that are flexible for staff.
- Monitor the training and development opportunities for staff to ensure they all receive equal access.
- Address seriously all concerns about bullying, harassment and victimisation through our policies.
- Ensure that the terms and conditions of employment, redundancy or dismissal are free from any form of direct or indirect discrimination.

Game-On Coaching as a Training Provider

Game-On Coaching will deliver training to a wide variety of apprentices and a range of employers within the digital marketing sector from a range of differing backgrounds and communities. To ensure equality of opportunity for all Game-On Coaching will do the following:

- When recruiting apprentices, Game-On Coaching will actively look to promote EDI throughout the process.
- Ensure that information about our programmes is accessible in different formats where required.
- Ensure that our assessment and application processes are clearly communicated. This will also include for apprentices with learning difficulties, to prevent any barriers to learning.
- Provide a welcoming and safe environment in our office locations and any training centres.
- Assess any needs and in turn support any requirements for any additional learning needs whilst remaining compliant to aid apprentices to participate and achieve their goals.
- Challenge any negative behaviour and empower apprentices to follow suit

- Analyse and collect equality data across our training provision and make the required regulatory returns to the ESFA and take positive actions to achieve parity outcomes for all.
- Consult with stakeholders associated with Game-On Coaching regularly about equality and diversity to inform continuous improvement.
- Include an appropriate channel and procedure in place for anyone wishing to raise a grievance in relation to equality and diversity. If the person raising the concern, doesn't feel that the case has been dealt with properly, and the EDI issue being reported is now a safeguarding issue, please refer to the whistleblowing procedure, as stated in the Safeguarding Policy.
- Celebrate success and encourage others to achieve success when promoting equality and diversity.
- Actively encourage those from diverse backgrounds to consider completing an apprenticeship.
- Game-On Coaching reserves the right to withdraw any training services from any apprentice or employer that behave out of line with our procedures. Any discriminatory disruptive or abusive behaviour will not be tolerated to any of our staff, partner staff, apprentices or any other person.

EDI Lead

The main contact is the EDI lead (details below). But all SMT will be trained on any EDI issues and will be able to act accordingly. The EDI lead must be notified of all cases for concern

Name: Luke Wilson

Position: Game-On Coaching Director

Phone: 07964 788099

Email:

- EDI@gameoncoaching.co.uk
- Luke@gameoncoaching.co.uk

Rights of Disabled People

Game-On Coaching values people with disabilities and understands that not all disabilities can be seen.

Game-On Coaching supports the Disability Confident scheme. Game-On Coaching will ensure that full and proper consideration is given to people with disabilities who apply for jobs and that adjustments are made to assist them do the job. Game-On Coaching will comply with any health and safety regulations within the digital marketing section. Game-On Coaching will offer support in relation to health and safety regulations to anyone who has a disability defined by the Equality Act 2010. This will be applicable to both apprentices and staff.

Under this policy Game-On Coaching will:

- Adjust for any employee who becomes disabled through training or providing any relevant equipment
- Give proper consideration to disabled people who apply for jobs and make reasonable adjustments for their abilities to aid them to do the job.
- Ensure that any apprentices involved with the Game-On Coaching, who have identified as having a disability received any additional reasonable adjustments and receive support from ourselves and our partners
- Game-On Coaching will ensure appropriate adaptations and support is in place for any apprentices that are using the Game-On Coaching premises.
- Game-On Coaching will provide help and support to any apprentice with a disability.
- Game-On Coaching will work closely with any employers who employ a disabled apprentice to ensure they have a safe and comfortable working environment whilst not being limited to being disadvantaged.

Complaints

Please refer to Game-On Coaching's Complaints Policy

Commitment to the Policy:

All Staff, contractors, apprentices and associates must adhere to the EDI policy to ensure the working environment remains equal and diverse for all. Game-On Coaching will consult staff, apprentices and key stakeholders when making amendments to the policy, along with contributions. Game-On Coaching values the thoughts of all parties and wants to ensure the EDI Policy works in protecting all parties, without creating any friction in the EDI processes.

All of the above must:

- Know who to contact if they have any EDI concerns.
- Know what to do in case of incidents.
- Complete all relevant training in regards to EDI.

Everyone associated with Game-On Coaching must make sure EDI is a top priority and adhere to all EDI policies and procedures.

Game-On Coaching will always adhere to the following:

- Listen, respect and value all.
- Appointing a EDI lead within the company
- Ensuring *all* staff are familiar with the policy and procedures.
- Ensuring that inductions and mandatory online training is completed by apprentices and employers within the agreed timescales.
- Confirming staff are recruited with equal opportunities for all to apply and receive fair treatment
- Making sure all staff complete EDI training when starting within the organisation.
- Making sure all staff and apprentices have access to Game-On Coaching's updates around EDI
- Ensuring procedures are used to manage any allegations against employers or staff.
- Providing training, support, supervision and quality assurance for all staff through effective management.
- Sharing Game-On Coaching EDI procedures and information with authorised parties who need to know. Including agencies involved with apprentices and any parents or carers appropriately.
- Ensuring regular reviews of the policy, procedures and recording forms take place in order to keep the policy robust.

Annual Review of the Policy

Monitoring and Review

The Game-On Coaching Board of Directors is responsible for implementing and monitoring the EDI Policy. The number of EDI cases will be reviewed on a regular basis. Game On Coaching will liaise with any relevant governing bodies, employers and apprentices to ensure the EDI policy is robust and competent. The policy will be reviewed on an annual basis to ensure that all updates to legislation are reflected and best practice is adapted.

Game-On Coaching will adhere to the following review process:

The process comprises policy monitoring, review, planning, implementation, and periodic evaluation.

Reports from monitoring and review activities regarding EDI will be reviewed by SMT and presented on a monthly basis. An annual report will also be compiled for stakeholders to see the impact of the policy.

This policy and the associated guidance and procedures document will be reviewed annually by the Board within four weeks of a review of any serious EDI incident.

This policy and the associated guidance and procedures document is to be made available to all staff and apprentices in various formats appropriate to Game-On Coaching audiences, e.g. in Apprentice Handbooks, on website etc.

Game-On Coaching will record all EDI incidents and keep them on file. On a monthly basis the EDI lead will look at the data collected to identify any themes or trends and look to improve the policy in order to mitigate the risks. (see below)

Possible Actions:

- Training could be required for all staff members in order to combat a new risk.
- Policies are updated/new policies created.

Senior Management Team Meetings

As part of all SMT meetings, EDI will always be a point on the agenda to discuss any concerns. Any immediate concerns will be dealt with initially without requiring an SMT meeting to take place.

On Going Review

Game-On Coaching will continually review and monitor a variety of information and resources to ensure the effectiveness of the policy outlined below. Data will be processed in accordance with the Data Protection Act 2018.

- Data will be collected from employees, applicants and apprentices based on age, gender, marital status and ethnic origin. Anyone who declares themselves as disabled will also be recorded.
- Employee data will be monitored on an annual basis in relation to recruitment, selection, learning, development and equal pay. This will help assess the opportunity afforded to ensure the diversity balance is achieved.
- Data will be collected on apprentice recruitment, achievement and retention and will be analysed and evaluated by demographic breakdown on a regular basis to consider the parity of starts, outcomes and retention between groups.
- Staff and apprentices will complete surveys to gain feedback regarding equality, diversity and inclusion. The feedback of this will be reviewed.
- Policies of our partners in relation to equality and diversity will be verified annually as part of our reviews.
- Network with other organisations to regularly be updated and informed of any positive practices.
- The board will be reviewed progress on a quarterly basis and action plans will be set

Advice and Guidance Provided by the Government

Equality and diversity is a subject that is constantly evolving and improving as new strategies are created within apprenticeships that aim to improve the quality and have an overall better impact.

Game-On Coaching will utilise guidance (as highlighted in the link) when it comes to dealing with equality and diversity issues. It will also utilise this guidance to help ensure practices are monitored and constantly improved to create a positive and diverse range of apprentices.

[Advice and guidance | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com)

Relevant Legislation and Codes of Practice

Game-On Coaching accepts its responsibility to all UK equality legislation including, but not limited to:

- Equality Act 2010.
- Human Rights Act 1998.
- Rehabilitation of Offenders Act 1974.
- Racial and Religious Hatred Act 2006.
- Protection from Harassment Act 1997.
- Sex Discrimination (Gender Reassignment) Regulations 1999.
- Relevant Codes of Practice issued by the Equality & Human Rights Commission.
- Data Protection Act 2018 (including the General Data Protection Regulations).
- Any amendments to the above legislation.

Key points and codes of practice that are mentioned in the above policies will be discussed and reviewed during training courses completed by staff at Game-On Coaching.

The Charity Governance Code 2017

The board at Game-On Coaching follows the charity governance code 2017. This code of practice defines 7 principles of good governance and has equality, diversity and inclusion led into them.

British Values in Education

Ofsted define British Values in education as:

- The rule of law.
- Democracy.
- Mutual respect for and tolerance of those with different faiths and beliefs and for those without faith.
- Individual liberty.

For more information please refer to the Prevent Policy

Types of discrimination under The Equality Act 2010

Discrimination can be direct or indirect. The Equality Act 2010 recognises the following types of discrimination:

- indirect discrimination.
- direct discrimination, including perception and associative discrimination.
- discrimination arising from a disability.
- victimisation.
- harassment.
- failure to make reasonable adjustments.

Direct discrimination:

This is classed when an individual is treated less favourably than others because they are a protected characteristic (see list).

Discrimination by association (Associative):

This is classed as discrimination against someone because of their association with an individual who has a protected characteristic.

Discrimination by perception:

This is discrimination against someone because it is believed they have a protected characteristic. It still applies even if the person does not have the characteristic.

Indirect discrimination:

This applies when a condition or practice puts someone with a protected characteristic at an advantage. This can only be justified in exceptional circumstances and it can be shown the action was reasonable. It must be shown as a proportionate means of achieving a legitimate aim.

Discrimination arising from disability/failure to make reasonable adjustments:

Discrimination is classed as when an employer/organisation fails to:

- Take reasonable steps to avoid a practice that puts disabled people at a disadvantage compared to people who are not disabled. This includes formal/informal rules, practices, arrangements or one-off decisions and actions.
- Remove or amend a physical feature that puts a disabled person at a disadvantage compared to those who are not disabled.
- Provide an accessible format of information
- Provide auxiliary aids or services where this is the only thing that puts disabled people at a disadvantage.

Harassment:

This is classed as unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual'.

INDIVIDUALS CAN COMPLAIN ABOUT OFFENSIVE BEHAVIOUR EVEN IF THEY DON'T HAVE THE RELEVANT CHARACTERISTIC OR IT IS NOT DIRECTED TOWARDS THEM.

Victimisation

This is where a person treats another with less favour because they have asserted their legal rights in line with the equality act or associated with someone else who has done. This includes making a complaint, providing evidence related to proceedings or claiming discrimination has taken place, or taking legal action.

For example, if someone claims they have encountered racism and as a result they are then ignored. An individual is not protected if they have made a false complaint.

Genuine occupational requirements

In line with current regulation, any job may be restricted to a particular characteristic if there is a 'genuine occupational requirement (GOR). For example, a religious organisation could request applicants for a practising member of their faith.

Positive action

If members of protected groups are underrepresented then action can be taken to encourage people belonging to that group to take advantage of opportunities (such as training, work experience or encourage them to apply for a job).

Monitoring and Version Control

Author	Ashleigh Gorton
Owner	Luke Wilson
Last update	30/03/2023
Next Review	29/03/2024
Signatories	 Ashleigh  Luke

Appendix

Anti-Bullying Policy

Game-On Coaching – Anti-bullying and Harassment Policy

Game-On Coaching aims to promote the Anti-Bullying Policy across multiple avenues to ensure that the information and practices are clear and available for all to see. Please see below further information regarding Anti-Bullying as part of the EDI policy at Game-On Coaching.

Statement

A working and learning environment must aim to provide all staff and apprentices a suitable environment that encourages them to fulfil their potential, whilst the dignity of everyone is respected. Game-On Coaching aim to provide such an environment to all staff, apprentices and any associates. The working environment should promote equal opportunities for all and be free from any form of bullying or harassment. Harassment can have a detrimental effect on working, studying and social conditions and can have negative implications on staff, apprentices and anyone associated with the company. Any incident of harassment will be taken very seriously and can result in disciplinary action.

INDIVIDUALS CAN COMPLAIN ABOUT OFFENSIVE BEHAVIOUR EVEN IF THEY DON'T HAVE THE RELEVANT CHARACTERISTIC OR IT IS NOT DIRECTED TOWARDS THEM.

Harassment: What is classed as harassment?

A source of great stress to an individual can be classed as harassment. In some cases, it can be so serious that it forces the person being harassed to feel it is necessary to change jobs, or not complete their learning. Anyone associated with the company is responsible for making sure that individuals don't suffer any form of harassment. All individuals associated are also encouraged to support any legitimate complaints.

Definitions of Harassment:

Harassment can be defined as any sexual, bullying, racial or other forms of personal harassment that arise from age, sexual orientation, disability, religion, gender or any other personal characteristics.

Harassment can occur in any setting or situation. It may occur when the harasser is in a position of authority. For example, a supervisor or coach that can affect another person's job or career. It is hard to determine harassment, but the defining feature is that the behaviour is unwanted by the receiver and would be regarded as harassment by any reasonable person.

Sexual Harassment

Sexual Harassment involves any unwanted attention in a sexual nature. It can include attention that highlights sexual status over an individual.

It can include, but is not limited to, the following:

- Physical touching
- Suggestive looks
- Indecent assault
- Rape
- Verbal remarks (including suggestive or belittling language)
- Unwanted demands for sex
- Compromising invitations
- Aggressively foul language
- Sharing and displaying sexually suggestive images (including both hard copies and digital copies)

Sexual Harassment is prevalent when any behaviour creates a hostile, offensive or intimidating environment in the employment, study or social setting. Behaviour that makes the recipient feel like they are viewed as a sexual object is more than likely to cause offence. This includes if no offence is intended.

Religious and Racial Harassment

This can be defined as any offensive act, hostility or negative expression by one individual to another against a person of racial, ethnic origin or religious belief.

This can include, but is not limited to:

- Insults
- Racist jokes/graffiti
- Verbal abuse
- Threats
- Physical acts (from gestures to physical attacks)
- Derogatory name calling
- Ridiculing of cultural differences or religious beliefs

Racial and Religious Harassment is prevalent when any behaviour creates a hostile, offensive or intimidating environment in the employment, study or social settings. Varying cultures or attitudes can misinterpret social signals. E.g where one person may perceive action as racial/religious harassment, and another may not.

Bullying

Bullying can be for example both open aggression and insulting remarks but can also be subtle. Bullying can also occur when individuals are singled out or devalued in a work setting. Bullying can have serious impacts on both physical and mental health.

Bullying can include, but is not limited to the following:

- Unfounded criticism of performance
- Criticising people in front of others
- Shouting at people to get things sorted

- Belittling others
- Physical abuse
- Cyber Bullying (See IT Policy)

Cyberbullying is a form of bullying that takes place using digital devices or online platforms such as social media, email, and messaging apps.

Personal Harassment

Other examples of harassment can include, but are not limited to, the following:

- Pranks about age, culture, race, religion, disability or any other characteristic
- Hostility based on cultural denomination
- Insults based on appearance, sexual orientation, gender or disability
- Demoralising anyone based on their ill known health or disability and depowering them.

Reporting and Investigation

Any apprentice who experiences or witnesses bullying or cyberbullying should report it to their trainer, the Designated Safeguarding Officer, or the apprenticeship manager as soon as possible. All reports will be taken seriously and treated confidentially. Game-On Coaching will investigate all reported incidents promptly and fairly, and take appropriate action to address the behaviour and support those affected.

Disciplinary Action

Bullying and Cyberbullying are serious offences and may result in disciplinary action, up to and including termination of the apprenticeship. Depending on the severity and frequency of the behaviour, Game-On Coaching may take any of the following actions:

- Inform the apprentice's employer and/or parents/guardians of the behaviour
- Provide support and counselling to the victim
- Provide counselling and support to the perpetrator
- Issue a formal warning to the perpetrator

What Action to take if you are harassed:

Any behaviour that can be construed as harassment should be reported and reporting is encouraged.

No one should deter from making a complaint in fear of embarrassment or public intimidation. Any complaints regarding harassment will be confidential and individuals are encouraged to speak out as they should not tolerate any forms of harassment.

1. If applicable, an individual should make it very clear to the offending individual that their behaviour is unacceptable. In some cases, this may cause them to stop. If an individual does

not feel confident enough to do this in person, they can put it in writing to the perpetrator and they are encouraged to keep a copy.

2. Keep a record of any incidents. In the future, you may need to reflect on what has happened. It is encouraged that individuals make a note of the time, date and details of the incident (this may include anyone that may have been a witness).
3. Seek advice. Game-On Coaching encourages you to seek advice from a friend, college or staff representative. You may also seek a meeting with a member of the senior management team, including the DSO (Designated Safeguarding Officer). You may be accompanied to these meetings by a trusted friend or colleague. Any additional action will not take place without the claimants permission and the offender will not be provided with any names or details unless permission is granted. The main purpose of the meeting is to discuss the harassment and try to find a solution. A record of the meeting will be kept (anonymously)
4. Medical attention. If the harassment is causing any stress, injuries or is making you feel ill you must go and speak to your doctor.
5. Informal action. In most cases, the main objective is to stop the harassment. It may be applicable that if harassment is occurring between two individuals, the matter could be resolved internally (providing the harassment isn't too severe). Where this may be too embarrassing for an individual to do, a different approach would be to gain support from a senior member of management. This could include being accompanied by a senior member of management when addressing the harasser. An individual can explain that certain behaviour is offensive and if it doesn't stop, that a formal complaint may be raised. It is advised that a record of the discussion is recorded. This type of approach could be used if the offender does not realise their behaviour is deemed unacceptable.
6. Formal action. An individual can make a formal complaint. If it is too embarrassing to discuss in person, the individual can write a formal letter to HR . It will be addressed based on one of two ways

If the Harasser is a Member of Staff

The formal complaint will be passed to a managing director who will personally investigate the harassment issue. At this stage, the alleged offender must be made aware of the complaint and given full details. They are then provided with the opportunity to respond. Strict confidentiality will be upheld throughout the proceedings. Once the investigation has been completed, Human Resources will then decide further action. This may include, but is not limited to, the following: Writing a letter giving guidance to both parties, instigating further conversations or deciding if a disciplinary hearing should be held or no further action is taken (reasons must be provided). If disciplinary action is taken, then the disciplinary procedures will be applied.

If the Harasser is an Apprentice

If the harasser is an apprentice, then the formal complaint will be passed to the coach responsible for that apprentice. They may investigate themselves but can seek assistance from a senior management member at Game-On Coaching. The apprentice's employer will also be notified. The harasser in question will also be made aware that a formal complaint is being raised against them and full details will be provided. They will be given the chance to respond. Appropriate action will be decided once an initial investigation has been made. This may include, but is not limited, to the following: instigating further conversation, writing a letter providing guidance to both parties or completely removing the harasser from their programme. No action may also be taken (with reasons provided to both parties). If a disciplinary hearing is to take place, then all information will be provided to the harasser's employer whom will then take appropriate action.

Victimisation

Any individual who brings forward an incident of harassment will not be subject to retaliation and allegations will be dealt with under appropriate disciplinary procedures.

Disciplinary and Grievance Procedures

Any individual who breaches the policy will be subject to disciplinary action. Cases will be referred to Human Resources and appropriate action will be taken in accordance with existing procedures. If the action taken is not deemed satisfactory then further action can be taken (under the formal grievance procedure).

Harassment Involving Violence

Individuals can exercise their legal rights at any time:

1. If an individual has been attacked (or feel threatened in any way) then it is advised that you seek help immediately by reporting the attack to the police. Anyone at Game-On Coaching will provide advice and support. Advice will be provided, but it is the individual's choice in what they want to do. Support will be provided if you seek police help
2. If an individual has been sexually assaulted or raped, then medical attention is required immediately. It is strongly advised that the police are notified. Game-On Coaching are there to support and provide applicable advice.

Overall, Game-On Coaching wants to provide a learning and working environment that provides all individuals the chance to learn and work whilst being free from any form of bullying or harassment and will endeavour to uphold this. Any appropriate action will be taken to ensure this environment remains free from bullying and harassment.

Prevention and Education

Game-On Coaching will take a proactive approach to prevent bullying and cyberbullying by providing education and training to all apprentices, trainers, and staff. Game-On Coaching will incorporate this policy into the induction and training programs to ensure that all individuals (both staff and apprentices) understand what constitutes bullying and



cyberbullying, the potential impacts of such behaviour, and their responsibilities in preventing it.

Apprentices are encouraged to use technology responsibly and to treat others online with kindness and respect.

If an apprentice witnesses someone being bullied online, they should not engage with the bully and instead report the incident to a member of Game-On Coaching's staff.

Apprentices should also be mindful of the information they share online and be cautious of giving out personal information to strangers.

Responsibilities

Everybody associated with Game-On Coaching are required to adhere to the Anti-Bullying Policy and must ensure that bullying does not take place.

The overall responsibility for action required if bullying occurs lies with the directors of Game-On Coaching and the Human Resources department to determine the best course of action that will need to take place.